

## East Devon Local Plan Issues and Options Consultation (Regulation 18)

### **1. Further comments on behalf of Vistry Homes**

- 1.1** In general a review of the Adopted Local Plan is welcomed. The NPPF advises that ‘*policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years,...*’ (paragraph 33). If the local plan is adopted in 2023 as suggested, the policies in the current plan would be considerably out of date by then.
- 1.2** The development industry was generally supportive of the GESP as a mechanism for guiding new development and providing certainty. Moving forward it is critical that the new local plan is progressed at pace. Without this, speculative development in less sustainable locations could occur and delays in the delivery of jobs and houses will continue to affect affordability and prosperity.
- 1.3** It would also be helpful to understand how any evidence base documents have informed the new local plan. Presumably, evidence which was prepared to support the GESP could be made available by the Council to set out the current baseline position and key issues in East Devon. Regrettably a Strategic Housing Market Assessment is not available as this would have allowed a more rounded understanding of the issues facing East Devon.
- 1.4** Guidance within the PPG makes it clear that:
- ‘The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively..... The process should be started early in the plan-making process and key stakeholders should be consulted in identifying the issues and any relevant data that the assessment must cover.’ (Paragraph: 038 Reference ID: 61-038-20190315)*
- 1.5** Chapter 2 of the Initial Consultation document contains a number of suggested objectives. With such a wide range of stated issues there will inevitably be conflict. Therefore, the Council will need to very clearly communicate how the identification of issues has led to the stated plan objectives. It is not clear whether the objectives are intended to have equal importance or are listed in priority order. If it is the latter, then this would suggest that health, wellbeing and the climate emergency have been prioritised over future housing and business needs. Ultimately, economic conditions will be a key factor in achieving future prosperity in the area which in turn will assist the Council in meeting its other objectives.
- 1.6** In accordance with the NPPF the presumption in favour of sustainable development should be a fundamental aspect of the plans focus. This will ensure that new development is located in the most sustainable places, in close proximity to complementary uses (i.e houses close to jobs, shops and transport routes) with the least environmental impact. Whilst climate change and other environmental concerns are significant issues to consider the plan should identify and provide for objectively assessed needs (NPPG Paragraph: 036 Reference ID: 61-036-20190723).

**1.7** It is inevitable that development on greenfield land will be required as part of the emerging local plan. Once the objectively assessed need for the area and any unmet need is confirmed development should be located in sustainable locations where key services and facilities are easily accessed by walking and cycling or public transport. Areas at the highest risk of flooding should be avoided along with environmental assets of most importance such as the AONB.

**2. Addlepool Farm**

**2.1** Vistry Homes control approximately 37 hectares of land on land to the north and south of the Woodbury Road, Clyst St George. The site lies within flood zone 1, is not within an important valued landscape such as AONB, is outside the currently defined green wedge and is generally unconstrained by other environmental or heritage designations.

**2.2** An initial assessment of the site has been undertaken and a masterplan prepared to demonstrate the site's development potential (see attached). The masterplan illustrates how a development of around 700 dwellings, a local centre including education site and substantial areas of green infrastructure could be delivered. New vehicular and pedestrian junctions are provided on to the B3179 and A376 which would allow good access to the wider transport network and onward links to Exeter and the wider area. The site is approximately 1 mile from Topsham railway station.

**2.3** Whilst maintaining physical separation from Clyst St George, development in this location would help to support and maintain existing local services and meet local and district housing needs.

**2.4** Overall, the site could provide a sustainable location for development complementing a wider spatial strategy for development in East Devon.

