

INTRODUCTION

Waddeton Park Ltd is a very well-established and successful local housing land promoter and investor with considerable interest across the district. Waddeton Park Ltd has helped to facilitate new homes, affordable housing and other uses in the area. Specifically, Waddeton Park Ltd has interests in land at London Road, adjacent to the Cranbrook built-up area boundary, which they consider has potential for residential development. We attach a plan that shows this land (please refer to the Framework Plan produced by Clifton Emery Design)

Given the nature of their long-standing interests across the district, Waddeton Park Ltd is an important local stakeholder and is interested in the proposals in the East Devon Local Plan for future development in the district.

Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations.

CHAPTER 4. DEVELOPMENT AT THE WEST END

Waddeton Park Ltd OBJECTS to the strategy for development at the West End. This part of the Local Plan is not considered to be sound as the approach that has been taken to allocating sites for housing development to meet local needs is unjustified – there are more appropriate strategies that East Devon District Council (EDDC) could have chosen. Ultimately, the strategy for development at the West End is flawed because:

- 1. Sensible options for housing delivery around Cranbrook (but outside of the Cranbrook Plan DPD area) have not been considered.**

It is noted that there is a separate Cranbrook Development Plan Development Plan Document (DPD), adopted 2022, which will sit alongside the Local Plan. However, Cranbrook is now a substantial town in the West End of the district with all of the attributes of a main town (two primary schools, a secondary school, town centre, railway station etc). Cranbrook will, ultimately, become one of the largest settlements in East Devon. It is unreasonable and illogical to miss opportunities for the expansion of Cranbrook and discount opportunities for growth in one of the more sustainable locations in East Devon simply because the area is subject to a separate DPD. It would be inherently sensible to look for modest additional growth opportunities around Cranbrook, which could make a

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meaningful contribution to housing delivery early in the Local Plan period. Some additional, incremental growth is entirely suitable in Cranbrook in locations that fall outside of the Cranbrook Plan area but are very much part of Cranbrook in practical terms. Sites right on the edge of this sustainable settlement should be identified for growth.

Waddeton Park Ltd is promoting for housing development an area of land to the south of London Road, immediately adjacent to the Cranbrook Plan area and the built-up area boundary of Cranbrook. We attach a plan that shows the sustainability credentials of this land, which highlights how accessible this land within the West End is – please refer to the Sustainability Plan, produced by Clifton Emery Design. This land is available now and capable of early delivery.

The land to the south of London Road has already been subject to initial design work to consider potential constraints and opportunities, informed by technical advice on matters such as highways/access, visual impact, drainage, noise and heritage impact, and a framework masterplan for the land has been drafted – a copy of which is included with these representations. This confirms that the land is capable of delivering housing and a mixture of other benefits for the district, including on-site affordable housing, public open space/SANGS and biodiversity net gain. As a result of the feasibility work that has been undertaken so far, there is already considerable certainty that a housing development on the land is credible, deliverable and able to be brought forward in a way which is entirely compatible with the character and constraints of the area in which it would be located. Furthermore, because of the extent of Waddeton Park Ltd's land interests, there is the potential for any development to the south of London Road to help address any unmet need for SANGS resulting from other housing developments in the West End, which would be a significant public benefit.

However, under the current approach, this area of the West End has not been considered for housing development – sites that has been put forward in this part of the district have not been assessed as part of the Local Plan allocation process because EDDC has taken the view that this area falls outside of the remit of the East Devon Local Plan. Given the Plan's overall objective of maximising growth opportunities in the West End, a blanket refusal to consider possible growth around Cranbrook is arbitrary and inevitably pushes development pressures to other less sustainable locations. It is unsound to ignore the opportunity to bring forward growth on our client's land (or other possible locations) in the immediate vicinity of Cranbrook, which can be delivered without harming the strategic objectives of the Local Plan, just because there is a separate DPD.

It is notable that as part of the preparation of the Cranbrook Plan DPD the Council has itself previously seriously considered the merits of allocating land to the south of London Road, in the area of our client's land, for housing development. For example, as far back as 2016, the Issues and Options draft of the Cranbrook Plan DPD indicated that such growth could be possible in two of four options presented, and noted that there were a number of advantages to this approach. Furthermore, as part of the decision making on planning applications for a larger scheme on the land to the south of London Road (15/0371/MOUT and 15/1825/MOUT) EDDC's own landscape officer consultant concluded in his assessment that *"a more limited road frontage development, as indicated on figure 1, could be acceptable, as it will have a more limited impact on the character of the local landscape and would be visually much better contained. It would be more in keeping with the development form seen along this part of the London Road."* The Figure 1 referred to is included with these representations.

The previous consideration that has been given to development in this area must reflect the merits of this approach.

2. The strategy for housing delivery is too heavily reliant on the timely delivery of a new settlement.

The strategy for development at the West End is too heavily reliant on the proposed new settlement for housing delivery early in the Local Plan period. There is real uncertainty on the delivery of this settlement and on the timing of delivery – there is still a lot of work that needs to be done to understand whether it is feasible for the new settlement to deliver 8,000 new homes on the land that has been earmarked and it is recognised widely that there will be significant challenges due to the number of different land ownerships, the topography of the land, highways constraints etc.

Whilst it is sensible to bring forward a second new community in the location proposed, we would suggest that there is a lot of merit in making provision for bringing forward some additional land adjacent to Cranbrook, which is capable of early delivery. It is noted that in addition to the 8,000 homes proposed for the new community, Strategic Policy WS01: *Development of a Second New Community East of Exeter* sets out that at least an additional 2,000 new homes will need to be accommodated here after 2042 – the policy acknowledges that how this might be delivered will need to be determined through further work. Whilst it makes sense to maximise opportunities at the new community, if there is a need for an additional 2,000 homes to be provided that is not being met in the 2020 to 2042 Local Plan then the Council should be looking at other sites now.

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A far more sensible, and safer, strategy would be to plan to bring forward more housing in the West End of the District, to the south of London Road, next to Cranbrook, early in the plan period. Adopting this strategy would help to boost housing supply and relieve early pressures on the new settlement when there is still a lot of uncertainty over its deliverability.

In light of the significant concerns outlined about, the approach to allocating sites for development in the West End of the district requires further detailed consideration and, as drafted currently, this part of the Local Plan is not sound. Land to the South of London Road should be included in the Local Plan as an allocated for housing development in the West End.