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12 January 2023

Dear Sir,

CONSULTATION DRAFT LOCAL PLAN, PREFERRED OPTIONS REGULATION 18, AUTUMN 2022

I should like to offer the following comments and observations on the Consultation Draft version of the East Devon Local Plan on behalf of my client, Core Strategic Land Limited (CSL), of both a general nature and with specific reference to their land interest at Sidmouth Road in Clyst St Mary (Sowt_03).

This correspondence provides general comments on the Local Plan Consultation Draft and specific support for the site which is being proposed for development at Sidmouth Road in Clyst St Mary (Sowt_03).

The headings and sections found in the draft Plan will be followed below for ease of reference.

Spatial Strategy – Strategic Policy 1

It is agreed that the focus for new development should be on the western side of the District and towards the most sustainable locations such as Clyst St Mary.

Additionally, it is important to allow some development to meet the housing needs of the District over the Plan period at Service Villages such as Clyst St Mary. I am in broad support of Strategic Policy 1.

Housing Distribution – Strategic Policy 2

The Table sets out 116 dwellings in total for Clyst St Mary over the Plan period, 2020-2040, including 102 on allocations in the Plan – we agree with this broad level of housing for Clyst St Mary but this could possibly be a higher given the sustainable nature of Clyst St Mary and proximity to Exeter/ Winslade Park in the western side of the District.

Levels of Future Housing Development – Strategic Policy 3

I have not assessed housing provision numbers in any detail but 18,920 over the Plan period or 946 dwellings per year net looks about right.

Significant numbers can be delivered via a new settlement which it is clear will be required as well as at large urban extensions at the Principal Towns such as Axminster and Honiton where allocations are being proposed. However, key to delivering housing numbers consistently and evenly over the Plan period from the outset is the allocation of smaller sites such as Sidmouth Road in Clyst St Mary which can be delivered in the short term.

A strategy of smaller sites in the shorter term and larger strategic sites including a new settlement in the longer term is the key to the delivery of housing numbers, including affordable housing. These smaller sites will add to the choice and variety of housing options too.

Mixed Use Development – Strategic Policy 5

I strongly object to Strategic Policy 5 because small employment sites contained within the smaller housing sites will not work. Small housing sites need to be situated in sustainable locations, well linked and connected to employment opportunities.

Mixed use development is a good idea but on larger sites where the employment land measures a few acres at least in order to provide practical and appropriate employment land which is attractive to the end users. For me, it is better to allocate larger employment sites situated in appropriate, sustainable locations in the District.

Additionally, there are large and significant employment sites located in close proximity to this site at Clyst St Mary including Winslade Park, Crealy Theme Park, The Show Site and business parks on the fringes of Exeter itself. These employment sites offer a wide variety of employment opportunities and can all be accessed from this site at Clyst St Mary by non-car based means of transport such as cycling and walking.

Development at Service Villages – Strategic Policy 26

Clyst St Mary has a range of local facilities and amenities and is particularly well catered for as regards jobs with the recent successful development at Winslade Park, as noted in the draft Plan. There are other employment opportunities elsewhere, close to Clyst St Mary, including Crealy Theme Park, The Show Site and business parks at Exeter.

Within Clyst St Mary, there is a Londis convenience store, a public house (The Half Moon Inn), a village hall, Primary School, football/ cricket pitches, garage and garden centre. The village and this site at Sidmouth Road in particular are well served by public transport with a regular bus service which connects Clyst St Mary to Exeter and other locations in East Devon.

There is a bus stop situated immediately in front of this site at Sowt_03. Additionally, there is a public footpath and cycle path located immediately adjacent to Sowt_03 too which connects into a wider network. This site at Sowt_03 and Clyst St Mary more generally are all very sustainable with such a range of services and facilities and the excellent transport links.

In conclusion, Clyst St Mary is a suitable Service Village which has scope for development including housing in the Local Plan and there should be a few Local Plan allocations for housing in such locations as is being proposed in the Plan.

Affordable Housing – Strategic Policy 40

New housing developments should provide much needed affordable housing at appropriate levels. Therefore, Policy 40 is, as a principle, supported.

However, this should not be provided at a level of “At least 35%” – I would suggest that this threshold should be at 35% (and the word “least” removed) and this should be subject to financial viability, particularly if The Government has an aspiration for more brownfield land to be developed.

Design & Local Distinctiveness – Strategic Policy 62

I support new development which would be of the highest design quality with a focus on local distinctiveness which is consistent with Chapter 12 of the NPPF.

Housing Density & Efficient Use of Land – Strategic Policy 63

CSL supports this policy fully – residential development which seeks to optimise the density on any given site and makes the most efficient use of land should be supported subject to local considerations and any site constraints.

Walking, Cycling & Public Transport – Strategic Policy 65

Walking and cycling links should be prioritised in all new development and these links should be coherent, direct, safe, comfortable and attractive as suggested in the draft Plan. There is a cycle/ public path to the immediate south of this site at Sowt_03 on Sidmouth Road in Clyst St Mary, immediately abutting the site as noted above – this potential development would be able to link into this.

Additionally, new development should facilitate access to high quality public transport – as noted above, there is a bus stop adjacent to this site at Clyst St Mary which provides a regular service to Exeter and across in East Devon.

Local Plan Map – Clyst St Mary

I fully support the Map extract for Clyst St Mary and in particular the inclusion of the site at Sidmouth Road in Clyst St Mary (Site Sowt_03) as a preferred allocation. As outlined above, this site and the general location is seen as suitable for new housing development.

The impact of developing this site would be minimal as it is already bounded on two sides by existing development, housing to the immediate west and The Show Ground to the immediate east. The existing boundary to the immediate east of the site, namely the Show Ground, prevents unfettered urban sprawl, therefore this is not an issue with development of this site.

This site is very suitable for housing, being a logical extension of the village, surrounded on two sides by existing development to the immediate south and west and up to a clearly defined and defensible boundary in the form of The Show Ground to the east. Therefore, this sensible extension to Clyst St Mary at Site Sowt_03 does not represent ribbon development but sensible rounding off.

Conclusion

In summary, Core Strategic Land support a Local Plan approach which will deliver at least 18.920 dwellings (net) in the plan area over the plan period up to 2040 but this must be underpinned by the delivery of dwellings including affordable homes now and in the short term on smaller sustainable sites such as the land north of Sidmouth Road in Clyst St Mary (Sowt_03) which can be delivered and where there are no impediments to development in the short term.

The Highways Authority have agreed an access in-principle to this site directly off the A3052, offering a safe and convenient access. This is a sustainable location with a footpath/ cycle link adjacent to the site and a bus stop in close proximity. Development of this land would also provide an opportunity to complete a missing section of the adjacent footway link thereby improving the safety of pedestrians in the area, a significant benefit which would result from this development at Sowt_03.

A ecological assessment has been carried out and there are no ecological reasons why this site cannot be developed. Additionally, there are no heritage assets or environmental designations which would preclude this site coming forward for housing development.

In conclusion, there are no technical or legal impediments to this logical site at Sowt_03 coming forward for housing development in the short term to meet the District's housing numbers, including affordable local needs housing. Other larger sites and the new proposed second new town will take time to come forward and this site, with a willing landowner onboard, could be delivered in the shorter term.

For this reason, the Local Plan should and must place an emphasis on the delivery of sites such as Sidmouth Road in Clyst St Mary in the short term, sites which are realistic, can be delivered and have no technical or legal impediments to their delivery to ensure the delivery of housing in the shorter term to meet local and affordable/social housing needs in East Devon.

I should be grateful please if you could please confirm receipt of this correspondence.

Yours faithfully,

A black rectangular redaction box covering the signature of Oliver J Keates.

Oliver J Keates
MRTPI, Dip TP, BSc (Hons)