

## East Devon Draft Local Plan Consultation

Site allocation ref: West\_02

Site address: Field at junction of B3180 Exmouth Road and Bendarroch Road, West Hill, Devon, EX11 1JY

Dear Sir/ Madam,

Please accept the following representations in relation to the draft Local Plan consultation and draft Sustainability Appraisal. These representations relate to the above site (known as “West\_02”) that was put forward for development as part of the Council’s Call for Sites in 2017 and 2021. I can confirm that the site continues to be within my ownership and available within the next five years for housing-led development.

The following representations are made in relation to the land identified as West\_02 and shown on the location plan below. The site is located on the edge of West Hill, at the junction of B3180 and Bendarroch Road and is used for agricultural purposes. The existing site access is taken from Bendarroch Road.



## Housing and Employment Land Availability Assessment (HELAA)

As confirmed by the HELAA, West\_02 was considered acceptable in terms of suitability, availability and achievability. The site is not subject to any environmental, landscape or heritage designations (other than the “Pebblebed Heaths mitigation zone”) and is located in flood zone 1 only. In addition, the site was considered an acceptable distance from a range of services and facilities, being “*within 1,600 metres of 4 or more different local facilities and within 1,600 metres of a train station or bus route with an hourly or better service*”.

I note that Devon County Council raised concerns with the limited capacity of West Hill Primary School and Kings Academy as part of the HELAA process. However, the lack of school capacity affects all the nominated sites in West Hill including West\_01, West\_04 and West\_06, which are the preferred options included in the draft Local Plan. As such, this is a broader issue that would need to be addressed by the Council and considered as part of any housing led development in the village by way of financial contributions.

## Preferred Options Consultation - Draft Sustainability Appraisal, November 2022

West\_02 was again assessed as part of the draft Sustainability Appraisal report and received a similar score for each objective as the preferred options – West\_01, West\_04 and West\_06. However, the site was ultimately discounted for the following two reasons:

*“...rejected due to sensitive landscape with limited context of built form, and route to community facilities lacks pavement and street lighting along most of the route.”*

I have therefore reviewed these in turn and provide the following justification to support the allocation of West\_02 for housing-led development:

### I. Landscape Impact:

Under section 2 entitled “landscape commentary” (page 553), the panel remarked that West\_02 has limited context of existing built form and is mostly surrounded by countryside with forest to the west resulting in a “major negative effect”.

Firstly, the presence of numerous trees across the settlement means that West Hill is well screened from long distance views, including from the AONB to the east and land to the south of the settlement. The existing residential development to the east and woodland (Prickly Pear Blossoms Park and Recreation Ground) to the west also assists, to a certain extent, in limiting long- and mid-range views of the site.

Secondly, the proposed site allocations in the draft Local Plan indicate that housing development is being concentrated to the west of the village and therefore the landscape character will, inevitably, be affected by this level of growth. With this in mind, it is contended that development at West\_02, in combination with West\_01, West\_04 and West\_06 would be viewed within a higher density built context and would not significantly impact the changing landscape character of the area.

In addition, the landscape impacts would be appropriately assessed and mitigated against as part of any formal planning application.

## II. Access to Services:

In response to the second reason for discounting the site, there are a number of discrepancies and conflicting commentary included in the Sustainability Appraisal report which I believe has led to West\_02 being prematurely discounted from the site selection process.

Firstly, the “access to services commentary” (page 557, extract below) and positive scoring would indicate there are no over-riding sustainability issues with the site:

*“West\_02, 03 and 04 are around 500-600m to shop/school “as the crow flies”, but the actual route along Bendarroch Road-School Lane-West Hill Road would be much longer, lacking pavement or street lighting along most of the route. An hourly or better bus route runs close by on Bendarroch Road. On balance a minor positive effect for sites West\_01, 02, 03, 04 and 06.”*

In light of this, it is requested that the sustainability credentials of the site, and in particular the regular bus service, is given full weighting in the sustainability assessment. Indeed, the lack of pavements and streetlighting is also raised as an area of concern for West\_04 however, the panel did not give this as a reason to discount the site in the concluding remarks on page 560. In the interests of consistency, I would respectfully point out that a similar conclusion should be reached for West\_02.

Secondly, the report sets out a number of mitigation measures to address the likely significant adverse effects and maximise beneficial effects of development (page 559). This includes:

*“Create a direct pedestrian link through West\_04 and 06 to the primary school, village hall and shop to maximise beneficial effects of being within walking distance. This would also benefit West\_02 and West\_03.”*

In combination with the proposed allocations at West\_04 and West\_06, the report has identified a way to address the connectivity issues with West\_02 in terms of walking to local services. Accordingly, a pedestrian link through the sites, which would also foster good planning, should be considered a realistic option and given weight in the assessment of West\_02.

For these reasons, it is requested that West\_02 is given further consideration as a suitable site for housing led development. The site represents a sustainable location for development and the direction of growth in West Hill should assist in alleviating any connectivity issues as well as landscape impacts.