

Our Ref DS/SJS/
Date 13th January 2023



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East Devon District Council
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Dear Sir/Madam,

EAST DEVON DRAFT LOCAL PLAN 2020-2040 DRAFT LOCAL PLAN CONSULTATION

Introduction

Thank you for the opportunity to comment on the emerging review of the current Development Plan (DP) – in particular the Regulation 18 Consultation Draft Plan (dated November 2022).

Bearing in mind that the decision to proceed with the plan review was borne out of the ashes of the Greater Exeter Strategic Plan (GESP) we wonder, to what extent, the housing need figure of 18,176 (that this plan review proposes to provide for) considers 'Exeter overspill' i.e. the extent to which Exeter, that is constrained by some key environmental considerations (such as flood plains) is unable to meet its' own housing needs and whether this plan seeks to meet any of that need?

Whilst we support the basic strategic vision of the plan (policy S1), we do have some comments/objection points that relate to the soundness of that strategy that we set out in this letter. For ease of presentation we have grouped the comments into generic comments, and site specific comments.

Generic

Western Side

To understand the policy the 'Western Side' needs to be defined on a map.

What is the difference between 'West End' (a term used in the existing Development Plan [DP]) and Western side'? To adopt the policy without such clarity would be contrary to the important principle of providing certainty in plan making and decision taking. Clearly the view is taken that significant development in the 'Western Side' of the district is sustainable. That rather begs

the question about what is therefore the status of countryside policies in this part of the district (should it be the same as in the rest of the district?), and how important are the site boundaries? We consider that there should be some flexibility in the areas that adjoin, or are well related to existing settlement boundaries on the 'Western Side' of the district (such as adjacent to Cranbrook) to allow for growth that is plainly sustainable.

This is particularly true since, perversely, no provision is made for growth at Cranbrook beyond 2031 (the end date of the recently adopted Cranbrook DPD). We therefore consider that Policy S2 is presented in a confusing manner since it includes development provision at Cranbrook up to, but not beyond, 2031.

It appears that the preference is to commence development upon a second new town. However, experience demonstrates that any new town that is proposed now will not deliver before 2040 (Cranbrook was first allocated in February 1999. It then took circa 20 years to achieve occupations, post allocation). Thus, whilst not objecting to the principle of a second new town, per se, we would suggest that it should be considered little more than a 'direction of travel' only and that the 2,500 units proposed should be revised down to 500 (at most).

A more pragmatic solution is to look closely at sites on the edge of Cranbrook (that therefore fall within this plan area and outside of the Cranbrook DPD area) that are nonetheless sustainably located and, importantly, deliverable without the needs for large, expensive, up-front infrastructure provision.

There is a concern that without a slightly more 'dispersed' strategy in this part of the plan area then the plan will fail to provide a range of deliverable sites, including smaller sites (as required by Government policy) and a high risk of failure and/or delay risking a consequential lack of a deliverable 5 year supply of residential land during the plan period.

These concerns also place emphasis on the importance of bringing forward the North of Topsham allocation as soon as possible (as well as allowing for some further development adjoining Cranbrook).

Principal Settlement

We are pleased to see that the plan review recognises that 'Exmouth is by some way the largest town in East Devon and it contains the greatest number and range of services and facilities.' It is therefore correct, as the plan proposes, to identify the settlement as a principal centre.

Inadequate Level of Growth for Exmouth?

However, bearing that in mind, and the importance of meeting housing needs where they arise (i.e. that it is existing communities that grow, and the larger

the existing community the greater the level of commensurate growth - assuming consistent birth and death rates across settlements and discounting migration).

On that basis the level of proposed development makes little sense – it is too low and it fails to include any significant growth for the extended plan period.

The existing DP covers the period 2013 to 2031 (and was adopted in 2016) and provides for a minimum of 17,100 new homes. Of those, the plan provides for 1,229 new homes at Exmouth (some 7% - and that figure was arguably too low for the settlement). Of those 727 were already built, or under construction And 502 were not yet permitted (so were sites for allocation).

The lack of delivery of new homes at Exmouth has eroded social cohesion with many family groups being splintered and being forced to move to Cranbrook in order to access affordable housing.

We therefore consider that the planned level of provision for Exmouth is too low.

The Council/plan points towards environmental designations as being constraining but stops short of explaining/demonstrating how any of the proposed allocations actually produces a negative effect on those designations. We consider that a number of identified sites produce little/no negative impact on those designations and that there are no real environmental constraints that limit the level of growth at Exmouth to 7%. The plan should be amended to increase the level of provision at Exmouth to circa 10% of plan provision in order that the Town can meet a greater proportion of housing need where it arises and certainly to include both the 1st and 2nd choice sites in order to achieve this.

By contrast, Axminster, which is in an inherently less sustainable location (since it is not linked by effective bus link to the sub regional centre of Exeter or any other major existing centre) is proposed to receive a similar level of growth to Exmouth despite being some 6 times smaller than Exmouth.

Strategic Policy 5 – Mix of uses

The proposed policy is misconceived. There is no good basis upon which it makes any sense to try and set 'hard and fast' thresholds for the provision of employment use on residential led sites.

Employment land provision needs to be location/lack of constraint led i.e. well related to communication networks, able to accommodate buildings of scale in the landscape etc. The vast majority of sites that are proposed in this plan perform well from a residential perspective – that does not mean that they perform well from an employment perspective (and many that will be affected

by this policy do not). Instead of being a way of delivering employment land, it is much more likely that the employment requirement will either:

- prevent the delivery of the site (thereby detrimentally affecting residential delivery) and/or;
- prevent the delivery of any reasonable quantum of affordable housing (due to the cost associated with providing for employment provision in the face of weak demand)

The policy will not work as a 'general rule' and should be deleted from the plan.

If there are specific sites that perform well in terms of both residential and employment use criteria then they should be specifically allocated as mixed use sites (but that is not the vast majority of sites that will be affected by this policy).

We therefore conclude that the plan does not articulate a coherent policy for the delivery of adequate employment land to support the delivery of the district and the sub-region.

Policy 40 - Affordable Housing

The level of affordable housing sought, at 35%, is reasonable if expressed as a target rather than a minimum figure. Dependent upon site circumstances (abnormal costs) there will be reasons that figure cannot be provided in all circumstances – but in the most part it's a reasonable target figure.

The differential % requirements proposed demonstrate the viability problems with delivering the 2nd new town during this plan period. Cranbrook was only deliverable due to the injection of considerable amounts of Government grant (to the gas fired energy centre, and via affordable housing funding and the Help to buy scheme) plus Government funding for upgrade of J29, M5.

Since meeting social needs is a key element of sustainability this demonstrates the ineffectiveness of a new settlement as a way of meeting identified housing needs i.e. large infrastructure costs mean it will deliver a lesser quantum (20%) of affordable housing than if sites were allocated elsewhere (via urban extensions to existing settlements).

It also has the effect of displacing those in housing need and placing a strain on family ties (e.g. meeting housing needs arising in Exmouth at Cranbrook).

We are also concerned that changing the mix of affordable housing to seek more social rent and less affordable rent etc will have a detrimental effect upon viability at the same time as the % target is increased. This emphasises the viability concerns in relation to the realism of the increased target.

Policy 43 – Housing Mix

This policy is flawed. It is based on out of date information. It fails to consider the needs of providing for home working, and it fails to consider that there a plethora of reasons why people may need space in their homes.

It also fails to consider that it's simply not possible to apply a blanket mix. For example some sites will be flatted only – how will those sites deliver 4 bed houses?

Policy 44 – Self Build

Providing self build on medium/large sites is a flawed concept. Those seeking such sites aren't looking for an 'estate' location. Perhaps a better approach is to allocate some small sites for that function?

Policy 87 – Biodiversity Net Gain

There is no justification for pursuing a target figure in excess of the national standard (10%). The national policy will have a significant detrimental impact on delivery, and will produce little in the way of substantive ecological benefits that would not occur anyway. Please don't exacerbate these problems in East Devon.

Site Comments

Policy 17 – North of Topsham

The North of Topsham site is strongly supported. It has been subject to masterplanning (copy attached) that demonstrates that there is additional capacity to that which has been identified at this stage. Bearing in mind the concerns that we have expressed about the ability to commence a new town in this plan period we strongly recommend that the ability to capture this additional capacity should be realised.

Cranbrook Edge

Whilst understanding that this plan proposes no further growth at Cranbrook (hailed as the most sustainable settlement eco-town in the district) than that already allocated via the existing Cranbrook DPD it is striking in that there are further expansion opportunities near/adjoining Cranbrook that lie within this plan area (for example land at London Road 16/1825/MOUT) which are unconstrained by landscape matters (as acknowledged by the Council itself in the Issues and Options Report, June 2016). This site provides the opportunity to deliver growth in a highly sustainable location, with the delivery of parts of

the Clyst Valley Regional Park and ameliorate existing flood risks for Rockbeare without any conflict with the 'green wedge' protection for the separation of that settlement from Cranbrook.

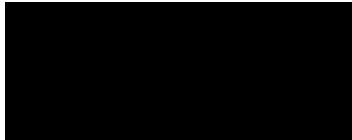
Exmouth

We support the proposed allocation of Land at Courtland's Cross (Lymp_07), subject to the caveat about our comments on the inclusion of employment use. This site is not particularly well suited to provide for employment use on site, but it is well suited to provide for recreational use which could provide a much needed facility for the local community (see attached letter).

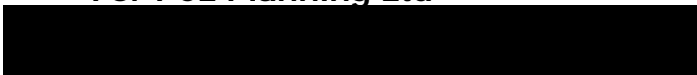
Ottery St Mary Sites

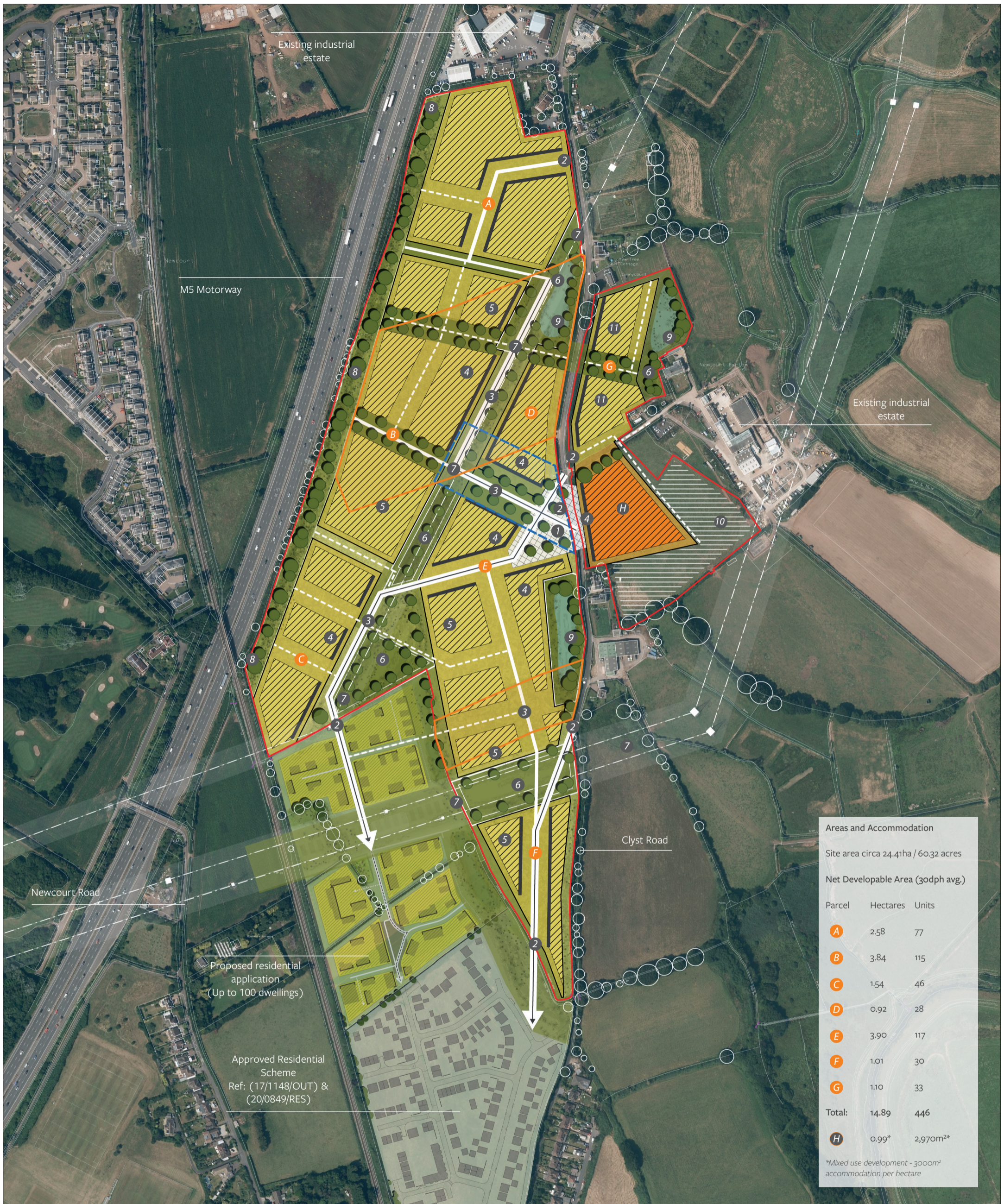
We support the proposed allocation of Land at Gerway Farm (GH/ED/29). We consider that the assessment exercise undertaken by the Council that identified this site as a '2nd' choice site is flawed. The site is unconstrained and available and deliverable. It appears to us that this area has been overlooked in favour of less sustainable, less viable and less deliverable sites elsewhere around the settlement.

Kind regards,



David Seaton, BA (Hons) MRTPI
For PCL Planning Ltd





Areas and Accommodation

Site area circa 24.41ha / 60.32 acres

Net Developable Area (30dph avg.)

Parcel	Hectares	Units
A	2.58	77
B	3.84	115
C	1.54	46
D	0.92	28
E	3.90	117
F	1.01	30
G	1.10	33
Total:	14.89	446
H	0.99*	2,970m ² *

*Mixed use development - 3000m² accommodation per hectare

- Scheme boundary
- Proposed trees
- Existing trees
- Residential development parcels and frontage
- Mixed use development parcel
- ETL (Electrical Transmission Line / 15m offset)
- Location of alternative public realm option
- 1 Public realm intervention at the junction of Clyst Road
- 2 Vehicular access point
- 3 Primary route
- 4 Development fronting the primary route
- 5 Key development fronting the open space
- 6 Public Open Space (POS)
- 7 Green Infrastructure corridor
- 8 Landscape buffer and acoustic barrier to M5
- 9 Overground attenuation
- 10 Land under client ownership
- 11 Development fronting Clyst Road

Newcourt Barton, Clyst Road
Framework Plan

200802 L 02 01 NTS March 2021

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RJ/DH

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YOUTH CHAIRMAN
Adam Fradley
1 Trafalgar Road
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CLUB CHAIRMAN / SECRETARY

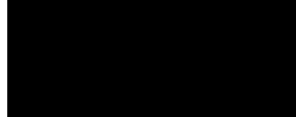
George Webster
1 Ash Grove
Exmouth. EX8 3BN



YOUTH SECRETARY
John Webster
1 Ash Grove
Exmouth. EX8 3BN

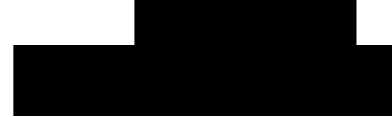


CLUB TREASURER
John Webster
1 Ash Grove
Exmouth. EX8 3BN



**CHARTER STANDARD
DEVELOPMENT CLUB**

Welfare officer
Emma Mountain
21 Underhill Crescent
Lymnstone. EX8 5JF



Dear Chairman

I am writing to you on behalf of my committee and all the members of our club to voice our support for the proposed housing development on Courtland Lane, with the provision of a sports facility (Football & Cricket) for our parish.

The football club itself has been in existence since 1895 and at present consists of 2 adult teams and 15 youth teams. Since our inception, our club has had many 'homes' in the village. We currently play our youth matches on the Cliff Field, Candys Field & St Peters School, while these may seem like idyllic locations, they do present us with many drawbacks mainly the cost of hiring and parking in the parish is a major problem. We also must play our adult matches at The Royal Marines camp due to the lack of changing rooms. This situation is almost unique in the Devon and Exeter football leagues and is rather embarrassing for us, especially as we have seen how so many villages in East Devon have so spectacularly improved their sporting facilities in the last few years.

It's a well-known fact that Parks, playgrounds and playing fields play a vital role in building healthy neighborhoods contributing to the physical, mental and emotional wellbeing of local people. Without access to these spaces the quality of life and wellbeing of residents is reduced. Guidance for Outdoor Sport and Play emphasizes the need for a range of both formal and informal outdoor spaces to meet our recreational needs. This development gives us the opportunity to not only secure our future but by placing the sports facility in a sports community Trust & register with Fields in Trust this will ensure that it will all ways remain so.

We'd be very grateful if you were to support this scheme.

Yours sincerely
George Webster
Club Chairman
Lympstone AFC

KEY

- 1. Site Entrance.
- 2. Village green (arrival space).
- 3. Biodiversity Area.
- 4. Existing woodland planting.
- 5. East Devon Way public footpath.
- 6. Existing Devon bank retained.
- 7. Major landscape fingers consisting of native hedgerow and tree planting.
- 8. Minor landscape fingers knitted within development.
- 9. POS/Landscape buffer to existing properties on Courtlands Lane.
- 10. Landscape buffer to provide diffused natural green edge.
- 11. Reinforced hedgerow boundaries with additional tree planting.
- 12. Village square.
- 13. Cricket pitch (Senior - Club level).
- 14. Football pitch (Senior - Club level).
- 15. Single storey Clubhouse.
- 16. Parking Area / Drop off.
- 17. Secondary access serving pitches.
- 18. Additional tree planting to boundaries.
- 19. Existing attenuation pond.
- 20. Circular footpath through POS/Landscape buffer areas with connection to East Devon Way.
- 21. Greater density, terraced properties fronting onto village greens.
- 22. Small farmyard courtyards serving detached properties.
- 23. Detached, low density properties arranged in farmyard courtyards.
- 24. Hedgerow boundaries providing natural boundaries to gardens.



DETAIL: ILLUSTRATIVE MASTERPLAN
 PROJECT: COURTLANDS CROSS, EXMOUTH
 DWG. NO: 210501 L 010

REV E

STATUS: PRELIMINARY
 DATE: SEPT 2021
 SCALE: 1:1000 @ A2

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