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Dear Sir/Madam,

EAST DEVON COUNCIL LOCAL PLAN CONSULTATION – REGULATION 19

Introduction

Please find herein representations on the Regulation 19 East Devon Emerging Local Plan consultation made on behalf of our clients Andrew and Phillip Cork who have the majority land interest in the site allocated under Policy WS10 (Development next to the M5 and north of Topsham).

We have organised this response in order that it follows the format for the response form provided and allows for comments on the policies etc to be considered individually as you have required. However, we have presented our response as a comprehensive assessment of the emerging plan and the Council's approach and therefore it is important to be considered in its complete form as well.

As the Plan allocates our clients' land interest, we do wish to be generally supportive of the Plan. However, it is also critical that the Plan can progress to adoption quickly without significant issues or risks to Soundness arising that will jeopardise and delay the Plan. Our representations highlight particular areas where we consider this is a current risk and that the Plan as it currently stands requires further work.

Overview of the Plan Approach

Some concerns do still exist regarding the overall strategy of the Plan, particularly in terms of approach to meeting housing needs and an inherent imbalance towards constraint and matters that ultimately constrain growth opportunities and the delivery of sustainable development.

This is despite the Government, through the updated NPPF published in December 2024, making it absolutely clear that there is a need to substantially increase housing delivery in the UK, setting a target of achieving 370,000 new

homes each year. The focus of the updated NPPF is explicitly on overhauling the planning system to address the chronic housing crisis and to support “builders not blockers” and to deliver growth.

The implication of the updated NPPF on East Devon is a significantly increased challenge in the number of homes that are required to be built, significantly above past delivery rates. We recognise the scale of this challenge; however, it also must be recognised that historic and substantial undersupply of housing has contributed to the severe housing affordability issues across the South West, including in East Devon.

In this context it is disappointing that the Council are seeking to benefit from the updated NPPF’s transitional arrangements, particularly as it appears to have been used with the sole purpose of enabling a lower housing requirement to be pursued. Which of course will simply continue to increase the gap between housing need and supply in the longer term. A matter that will be further impacted by the Council seeking what is an unjustified and inappropriate stepped housing delivery approach.

All this is before taking into account the Plan’s over reliance on delivery from a new community that remains largely untested through the Plan process to date; an inconsistent site selection process and a proposed policy basis that seeks unreasonable requirements without any consideration of the viability and deliverability issues they will create.

Importantly until the emerging Plan is adopted, the Council will still be required to demonstrate a 5-year supply of housing land based on the new standard method (1188 dwellings per annum), which as the Council themselves recognise under current claimed supply would be less than 3 years. The need to deliver increased levels of housing must therefore be a priority for the Council both through development management and plan-making processes, requiring a step change in approach towards positively planning for growth rather than focussing on constraint and requirements.

We elaborate further on the above concerns which we consider will risk undermining the soundness of the Plan if not addressed, when discussing the individual policies and sections of the Plan below.

Chapter 3 - Spatial Strategy

Strategic Policy SP01 – Spatial Strategy

We broadly support the spatial strategy outlined in Policy SP01 which recognises the role of the West End of the District in supporting the role of Exeter through strategic growth.

However, we do remain concerned regarding the reliance on the new community in respect of this Plan period. The experience of Cranbrook demonstrates the long lead-in times in respect of delivery, with first occupations at Cranbrook occurring some 20 years post allocation (having been arguably a more defined proposal than the new community at that stage). We provide additional comments on this in relation to Strategic Policy WS01.

Strategic Policy SP02 – Levels of Future Housing Development

Strategic Policy SP02 proposes a provision of 20,909 dwellings across the District. This is based on the transitional arrangement of 80% of the new standard method of 1188 dwellings per annum over the 22-year Plan period, equating to 950.4 dwellings per annum. However, rather than suggest this is delivered at a consistent rate, a stepped approach has been applied. This provides for 850 dwellings per annum across the first 12 years of the Plan period (2020/21 to 2031/32) and 1070 dwellings per annum for the latter 10 years of the Plan period (2032/33 to 2041/42).

This means that for the first 12 years of the plan period housing delivery is proposed at just 71% of the new standard method, significantly below the required 80% set out in the NPPF transitional arrangements. Indeed, on that basis, the Council would only reach 80% of the local housing need figure in 2042, by which time a new Plan is likely to be in place. This must question whether the approach is compliant with the transitional arrangements at all.

Furthermore, the approach would mean a year on year under supply of housing against the (reduced) housing targets for 12 years of 100 dwellings per annum, resulting in a deficit of 1200 homes by 2032/33 to be made up in the remaining 10 years of the Plan. The obvious concern that arises is whether the proposed stepped approach is simply a contrived way of firstly attempting to benefit from the transitional arrangements and secondly, avoiding making the important and difficult decisions required to meet the District's substantial level of housing need.

The approach is not sufficiently justified and relies on there being issues such as 'extensive planning complexities', 'environmental constraints', 'infrastructure issues' but these are matters faced to a large extent by every local planning authority and are not unique to East Devon. These matters in themselves and collectively do not justify a stepped approach, indeed it perhaps emphasises the need to frontload the Plan by maximising delivery from a range of sites rather than metaphorically 'kicking the can down the road' by delaying delivery and then over relying on the latter part of the Plan period. This includes enabling our

clients' site at North Topsham to be released efficiently and effectively at its earliest stage possible.

Modification Required

As we have set out above the Plan's approach in setting a stepped housing target is unjustified, goes against the spirit of the NPPF transitional arrangements and seeks to effectively push the matter of delivering housing to meet local needs into the next local plan cycle. The Government have been clear that in introducing the transitional arrangements they expect the progress of plans to be maintained, whilst maximising proactive planning for the homes communities need. We consider the stepped approach does not support the Government's intentions.

Therefore, currently this approach risks rendering the Plan unsound in our view. To address this the Plan will need to be the subject of fundamental modification. This will include removing all reference to the stepped approach within Policy SP02 and instead including a consistent housing requirement of 950.4 dwellings per annum over the entire Plan period.

Chapter 4 – Development at the West End

Strategic Policy WS01: Development of a second new community east of Exeter

We are concerned that there remains an over reliance on the role of the new community in the Plan period and that this further undermines the Plan's assumptions in respect of housing delivery and providing sufficient sites to meet local needs. The lessons of Cranbrook and the long lead in times in establishing land assembly and infrastructure planning do not appear to have been taken into account.

Whilst not objecting to the principle of the new community we do consider the Council are premature at this stage to rely on an assumption of 3,300 new homes being delivered within the Plan period by 2042. This is because beyond broad technical feasibility and a vision there is still a significant absence of detail as to how the new settlement will come forward and what is actually proposed.

Again, this reliance places additional pressures on the effectiveness of the Plan in the second half of the Plan period if, as expected, the suggested level of housing coming forward on the site is significantly behind the trajectory.

It emphasises the point that the Council must ensure resilience to the Plan by enabling the early release of other site allocations, facilitating phasing where appropriate to support delivery in the earlier stages of the Plan. Whilst it is

correct that the new community will have an important role in the future, it is not there yet in terms of certainty of detail and should not be used to underpin this Plan's strategy. Instead, this Plan's strategy should be based on a range of sites that includes maximising opportunities early in the Plan period and the delivery of sites, (phased appropriately) less burdened by constraints and infrastructure capacity issues.

Strategic Policy WS09: Clyst Valley Regional Park

Strategic Policy WS09 (Clyst Valley Regional Park) identifies, and contains policy for, the Regional Park. As raised previously in response to the Regulation 18 consultation, whilst we recognise the benefits of the Clyst Valley Regional Park (CVRP) in providing connected multi-functional green infrastructure in the eastern edge of Exeter, the rationale for its review and extension of its boundaries is not clearly explained or justified within the consultation material. Nor are the implications of the revised boundaries set out in terms of the overall strategy of the emerging Local Plan, strategic growth or development opportunities.

The policy contains a range of requirements for major development within, or on land adjacent to the Regional Park. Whilst some of these requirements, like providing connections to the CVRP (requirement B), are reasonable and feasible, other requirements appear inappropriate.

We are particularly concerned that requirement F of the policy requires contributions to the CVRP targets, including habitat restoration, tree canopy cover, public open space meeting certain standards, and delivering cycle trails. This policy appears to introduce a requirement that goes beyond typical delivery requirements. The implications on the deliverability and viability of relevant allocations have not been tested or considered further within the evidence base. There is no evidence that the policy will therefore be effective.

There also remains a lack of clarity on the potential impact of the CVRP extensions on existing businesses, including farming enterprises within or adjacent to the revised boundaries and how this might impact upon those existing uses and activities.

Strategic Policy WS10: Development next to the M5 and north of Topsham

The allocation of the urban extension to the north of Topsham for mixed use development is supported. From a sustainability perspective, we would agree that an urban extension to Exeter and Topsham, and the access to the wide

range of services and facilities that the City provides, is one of the most sustainable options for the Local Plan in delivering strategic planned growth.

Whilst we agree master planning will be an important element in ensuring development can come forward in a comprehensive and planned way we do consider the proposed wording of the policy is too negative in respect of release of individual sites. The site has already been the subject of framework master planning and visioning and being identified as a single strategic allocation will provide a further framework for decision-making in respect of key delivery and infrastructure matters.

However, the policy is worded in a way that would appear to require all unknowns and uncertainties to have been fully addressed prior to any part of the site being considered, including relying on the Council and Exeter City Council to have collaborated over a Delivery Framework. This all points to the potential for significant delay and the lack of delivery. It should also be noted that phases 1 and 2 of the Taylor Wimpey scheme at Clyst Road within the Exeter City administrative boundary is either complete or committed and therefore Exeter's interest and the need for collaboration would appear to be very limited.

It is important for overall Plan resilience, that whilst masterplanning will be required, development should be able to proceed in phases where it is demonstrated that it would not prejudice the delivery of the wider site (for example, by ensuring proper connections are made to land ownership boundaries and making appropriate contributions to infrastructure etc).

Indeed, it is often the planning application process that provides the certainty regarding the likely final form of development (including quantity, land uses, and S106 obligations) and therefore assists in establishing the apportionment of costs and infrastructure requirements through collaboration agreements between developers.

Therefore, any masterplanning and delivery framework will need to be undertaken in conjunction with the site promoters and be proportionate. It should aim to provide high level principles to aid a phased approach rather than rule out flexibility that is often key to the delivery of a strategic allocation.

There are clear benefits to this approach in that it enables elements of the allocation to be delivered as early phases to support Plan resilience and early housing delivery. It will begin to establish key principles and a direction of travel for the remainder of the allocation as well building confidence in the Plan strategy.

Modifications required

It is important that the housing delivery rate assumed from the new community (Policy WS01) within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it is seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision from the new community and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

Policy WS09 requires further evidence to demonstrate that the policy objectives of the CVRP are necessary and would not place unreasonable demands on development, leading to deliverability or viability issues. Without this further evidence the policy in its current form is unjustified and would be ineffective. It should be amended to reflect broad objectives to be encouraged rather than required or be deleted from the Plan.

As set out above we are supportive of Policy WS10 but are concerned as currently written it does rule out a more phased and flexible approach and early delivery.

Allowing a phased approach within the parameters of a strategic allocation will not prejudice the delivery of the wider scheme and is likely to be beneficial in the long term, in bringing development forward earlier. Therefore, the allocation should be modified to not rule such a release out in principle as the current wording suggests.

Chapter 6 – Mitigating Climate Change

We have previously raised concerns regarding the emerging plan's focus on ambitious policies seeking Net Zero by 2040 and the impact this has on the viability of development. This challenging ambition needs to be grounded by the imperative to tackle fundamental need for housing across East Devon. We remain concerned that the Regulation 19 plan includes a number of 'Climate Change' policies which, in some instances, may negatively impact the ability to deliver much needed development in the District. It is important that policy approaches carefully consider and evidence their implications on the ability of the Plan to deliver sustainable development to meet local needs.

Strategic Policy CC01: Climate Emergency

This policy refers to development that will generate 'significant emissions' as having to require clear justification including articulating carbon saving approaches to be incorporated in the development. The trigger for this is

incredibly broad, and we have concerns regarding how this could be applied to development in the future. This needs to be further clarified.

Strategic Policy CC02: Net-zero carbon development

This policy requires all new residential development to meet the Future Homes Standard 2025, or if this is not incorporated at the point of Plan adoption, meeting the draft standards (from the 2023 consultation). However, as the policy acknowledges, this is not yet confirmed and it is clear from the evidence base that the policy approach relies on the consultation draft of the Future Homes Standard. Given this will be controlled through Building Regulations in due course, we suggest the policy is in any case unnecessary as it duplicates forthcoming Building Regulation changes.

Strategic Policy CC05: Heat networks

This policy requires all major development within 1km of an existing heat network connection to provide a connection. Furthermore, developments over 1,200 homes will be required to provide their own. Whilst a policy that *supports* making these provisions could be supported, the use of the word *should* indicates limited flexibility (albeit, it is understood it is not a *requirement*). Connections to these networks can introduce an undue financial burden on developers, and introducing such stringent requirements could challenge viability, and cause delivery delays.

Strategic Policy CC06: Embodied Carbon

This policy sets out a blanket approach requiring all major developments to undertake an embodied carbon assessment instead of setting out any considerations as to when this would add value, i.e. when a development raises significant carbon issues or where there are opportunities to utilise existing buildings/materials. It will add unnecessarily to the costs of the application process without adding any value to the majority of projects unless the policy is clearer on the circumstances it should be required.

Modifications required

Policies CC01, CC02 and CC05 should be clarified to ensure that their requirements are clear in terms of triggers and flexibilities and do not duplicate other legislation better suited to implement objectives (i.e. Building Regulations). The Plan needs to be clear how any requirements can be achieved without raising deliverability or viability issues that may make the Plan ineffective.

Policy CC06 needs to be clarified in respect of the circumstances where such a requirement (embodied carbon assessment) would add value rather than setting out an unnecessary blanket approach for all major development. Otherwise, it should be deleted.

Chapter 7 - Adapting to Climate Change

Strategic Policy AR01: Flooding

Requirement B of this policy introduces a requirement *"For areas within 5 metres horizontal distance of Flood Zone 2, where there is no detailed modelling, assessment of this Zone with climate change will need to be undertaken in accordance with the most up-to-date Environment Agency hydrology, hydraulic modelling and flood risk mapping."* This appears to directly contradict national policy given such areas will include areas within Flood Zone 1 where the level of assessment is not required and sites of less than 1ha would not require a Flood Risk Assessment in any case.

Furthermore, this policy states that the flood resilient goal of the policy will be achieved by *"Ensuring that space is provided on all development sites for the inclusion of SuDS..."*. Whilst supporting the delivery of SuDS as the preferred drainage solution is appropriate (and consistent with national policy), requiring them on all sites is unreasonable as this will prevent the delivery of sites where SuDS are not feasible. The policy should instead reference the drainage hierarchy so it is clear that there is some flexibility where it is demonstrated SuDS are not possible.

Strategic Policy AR02: Water Efficiency

The policy identifies that all new dwellings should achieve the Optional Technical Housing Standard of 110 litres per day per person for water efficiency. In doing so it seeks a higher standard than Building Regulations, instead making an optional standard a requirement. The only evidence offered is a reference to the Water Cycle Study which is yet to be published. This is not sufficient evidence to set additional standards and the PPG is clear that such an approach must be justified by clear evidence. Furthermore the Written Ministerial Statement in relation to the optional new national technical standards is clear that they should be relied upon only where there is a clear evidenced need. These tests have not been met by the Plan's evidence base and the policy is unjustified.

Modifications required

Policy AR01 should be modified so that it is in line with national policy in respect of the need for flood risk assessment and the encouragement of SuDS.

Strategic Policy AR02 should be deleted from the Plan as it is unjustified and instead the matter can be appropriately dealt with through Building Regulations.

Chapter 8 - Meeting Housing Needs

Strategic Policy HN02: Affordable housing

This policy identifies the affordable housing requirements and the proposed tenure mix. The policy specifically identifies that at Axminster there will be flexibility in respect of tenure splits taking into account viability. This then implies similar flexibility will not be applied to other areas of the District, when of course the same considerations in respect of viability may be relevant.

Furthermore, it is noted that the requirement is 65% social rent with no indication of further flexibility between this and affordable rent (unlike the adopted Plan). Whilst the new NPPF does strengthen requirements for social rent, it is important to note that if the Plan does benefit from the transitional arrangements it will come forward under the 2023 Framework which included more flexibility between social rent and affordable rent. The policy wording would benefit from outlining the general flexibilities around the approach will depend on the circumstances of the scheme.

Policy HN03: Housing to meet the needs of older people

This policy introduces a requirement for all general housing proposals over 50 dwellings to deliver 10% of units as specialist housing for older people (SHFOP) (subject to commercial viability). This aspect of the policy is challenged for a number of reasons.

Firstly, this policy conflicts with itself. Requirement B states that all older person housing will be located within 400m walking distance of local facilities and shops. However, the Manual for Streets (2007) identifies that walkable neighbourhoods are typically characterised by having a range of facilities *up to about 800m walking distance* (and acknowledges that walking can replace car trips of distances under 2km) (paragraph 4.4.1). Clearly, by requiring SHFOP on all sites over 50 dwellings, there will be circumstances where SHFOP will be delivered beyond the 400m distance to facilities required by the same policy.

Secondly, the Council do not appear to have considered the financial impacts of this policy (and attempted to address this with the subject to commercial viability caveat). SHFOP typically has a depressed market value, which could have a material impact on the viability of site delivery when compounded with other policy requirements (like affordable housing and self-build plots), and

other CIL 122 compliant contributions. Without further evidence to support the viability of this requirement, the 10% requirement should be removed as it is not justified.

Thirdly the SHFOP requirements seem excessive and unnecessary given Policy HNO4 requires 100% of dwellings to meet M4(2) standards, making them accessible and adaptable, as well as the 5% M4(3) requirements for affordable housing. We note that M4(2) provides viability challenges in and of itself, and combining these with the SHFOP must create real concerns regarding the deliverability of housing under this Plan.

Policy HN05: Self build

The policy sets a 5% self-build requirement on all sites of 20 or more dwellings, yet provides no evidence of the needs or demands to support this requirement or ultimately the likelihood of the policy being effective. There is no evidence to support the idea that self-builders will want to build within the context of a general housing estate and it may reduce the ability to be innovative and creative. It also is likely to create logistical issues during the construction process

Requirement A of the policy requires self build plots to be marketed for at least 24 months from the point of being serviced and developable, and only after the lapse of this period can they be made available for development on the open market. We consider this period is too long and should be reduced to one year consistent with other local planning authorities. Otherwise, plots will remain vacant for extended periods of time and housing delivery will be delayed. Marketing for a year is more reasonable.

Requirement C of the Policy requires the size of the self build dwellings to be demand led, even though the provision is not driven by demand, it is driven by a unevidenced proportional approach. Matching local demands will therefore be difficult in many circumstances.

Additionally, this policy requires self-build houses to be completed within 3 years of purchasing a developable plot. There is no indication of the consequences of such a policy on a project that is underway which may have been delayed because of a change of circumstance or issues as part of the build process. This is unreasonable and not justified and should therefore be removed from the policy.

Modifications required

Modifications to the above policies are required. For Policy HN02 there should be greater recognition of the flexibility of approach and the circumstances such as

viability that will be important considerations. Furthermore, the tenure mix should include a degree of flexibility between social and affordable rent.

Policy HN03 is unnecessary and overly onerous and should be deleted from the Plan.

Policy HN05 should be significantly modified to reduce the length of marketing period and to remove the 3-year completion period as these are both unreasonable and unjustified. The basis for requiring a proportion of self-build on all schemes of 20 or more dwellings needs to be re-considered and evidenced by needs and demands, otherwise the policy will be ineffective and unjustified. We would suggest that the policy should be modified to be supportive in general of self-build development and set out the circumstances where applications would be positively received rather than set out specific site specific requirement that reduce the flexibility and innovation intended to be a key part of self-build. As an alternative specific allocation of self-build sites that is evidenced by local need and demand is likely to be far more effective.

Chapter 10 - High Quality Design

Policy DS02: Housing density and efficient use of land.

The policy goes beyond the requirements of national policy in requiring a design code for all major development proposals. Whilst it is recognised this might be appropriate in sensitive locations it is unreasonable to require a design code to be agreed for all major applications. It will simply add delay and costs to planning application submissions without adding any greater benefit to existing requirements such as Design and Access Statements etc. It is also very doubtful whether the Council would be able to sufficiently resource this.

Modification required

Policy DS02 should be amended to reflect circumstances where a design code maybe appropriate rather than a blanket requirement for all major applications.

Chapter 12 - Our Outstanding Landscape

Policy OL04: Areas of strategic visual importance

The policy intends to provide a framework to protect key views and views of local landmarks. Unfortunately, this policy is incredibly broad, and we are concerned that this will be used as a 'catch-all' policy to prevent windfall development that would otherwise be acceptable. Again, it raises concerns regarding the blanket approach to designations and requirements that the Plan relies upon. There are a number of other policy designations within the Plan that provide protection for areas of East Devon, and other heritage policies to protect

the setting of listed buildings. This policy, if it is to be retained, requires greater clarity on its true extent.

Modification required

Policy OL04 needs further refinement to be clear as to its purpose as it currently appears to repeat aspects of other protectionist policies and reads as a list of ways to prevent any development that can be seen from any view, which is clearly unreasonable. The opening sentence of the policy is sufficient and does not need the further criteria to be listed.

Chapter 13 - Our Outstanding Biodiversity and Geodiversity

Strategic Policy PB05: Biodiversity Net Gain

This policy introduces a requirement for major development to deliver at least 20% Biodiversity Net Gain (BNG), which directly contradicts the statutory requirement of 10%. It is also directly contrary to the PPG that advises that Plans do not need to include policies which duplicate the detailed provisions of the statutory framework. The PPG also makes it clear that:

"Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented."

The supporting text for the policy claims the 10% without species management provides negligible gains, and therefore a precautionary principle has been applied to ensure effective gains. The Council also claim that 20% is feasible and necessary. No evidence has been provided in the evidence base to support these positions and experience nationally in relation to achieving 10% BNG since the mandatory requirements have been in place suggest this is challenging enough.

It is also noted that despite being exempt from the mandatory BNG assessment the policy requires a statutory biodiversity metric for self-build development. Again, this is unjustified and unreasonable for development specifically exempted from these requirements by the statutory BNG framework.

The PPG requires evidence regarding why 20% is required, its impact on viability and details of how such a policy would be implemented. None of these tests have been met and policy is clearly unjustified, inconsistent with national planning policy and unnecessary given the statutory Framework now in place.

Policy PB09 - monitoring requirements for new planting schemes

This policy requires a financial bond by a developer prior to commencement of construction for 25% of the planting cost of a scheme. No justification for this policy is contained in the Plan nor the evidence base and this requirement is considered entirely inappropriate and unreasonable. Any condition or planning obligation requiring such a bond would fail to meet the relevant tests. It presumes a failure to deliver a consented scheme when other powers exist to ensure compliance. Again, it is simply adding unnecessary (and unjustified) additional requirements into the planning process that will create delay and increase costs and resources.

Modifications required

Policy PB05 goes above and beyond the statutory framework without justification. As the PPG suggests there is no requirement to duplicate the mandatory BNG requirements and so the policy should be deleted.

Policy PB09 introduces a bond requirement that is unreasonable and would fail the relevant tests for applying conditions and planning obligations. It should be modified to remove reference to a financial bond.

Conclusion

As set out above there are areas of the Plan that our clients are supportive of, and recognise they have a direct land interest in the allocation at North Topsham. This means that we clearly wish the Plan to be ultimately found sound so our comments above highlight areas where we are concerned the Plan does not justify particular approaches or provide sufficient evidence, which could lead to the Plan not being found sound.

To that end we have set out our comments largely to be helpful in flagging areas of the Plan where we believe more work is required and where further opportunities to provide resilience to the Plan can be achieved.

What is clear is the Council are facing significant housing challenges which the Government is clear in its expectation that it will need to be met through the delivery of substantially more housing. This does mean a step change in approach is required to ensure a balanced and comprehensive approach towards identifying sufficient sites to meet identified needs, facilitating early release (including phasing) and ensuring there is an appropriate balance between achieving delivery and over burdening development with unnecessary requirements.

Otherwise, the Plan will fail to demonstrate that it is based on an effective strategy underpinned by clear evidence, does not seek to appropriately meet identified needs and will limit the opportunity to deliver sustainable development.

Given the comments we have raised above we do wish to attend the Examination Hearings relevant to all the points raised in order to provide greater elaboration of the detail of these representations.

I would be very grateful if you could please keep me informed of the outcome of these representations and the progress of the Plan via the email address: planning@pclplanning.co.uk. Should the Council wish to discuss any of these matters. Then please do not hesitate to contact me.

Kind regards,



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