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East Devon District Council  
Planning Policy  
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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).

Whilst we support the basic strategic vision of the plan (policy S1). We do have some comments/objection points that relate to the detail 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 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 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 too, but not beyond, 2031.

Instead, the preference is to commence development upon a second new town. Our experience demonstrates that any new town that is proposed now will take some years to break ground and will not deliver the suggested pre 2040 quantum (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 we do consider that it should be considered a 'direction of travel' and that the 2,500 units proposed should be revised down to 500. Allocation of land on the eastern edge of Exeter, to the north of the A3052, is the ideal candidate for this streamlined new town.

This places emphasis on the importance of bringing forward the North of Topsham allocation as soon as possible, as well as allowing for some development adjoining Cranbrook, along with an adequate level of growth for Exmouth. 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.

#### *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 on residential led sites.

Employment land provision needs to be opportunity/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 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 afflicted by this policy).

## *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 2<sup>nd</sup> 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).

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. 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).

### **Site Comments**

#### *New Town*

We have explained how long the lead in times to delivery are likely to be (particularly bearing in mind the restricted ability for access to Government funding at present that is quite different to the situation when Cranbrook was proposed). However, some parts of the site, that have existing access to road frontage may be able to be released early (for example land at Cat Copse 15/1833/MOUT) and contribute towards reduced allocation numbers during this plan period.

Cat Copse is well placed to make a substantial contribution towards the new town, being able to accommodate up to 200 homes. The site also has the benefit of tying into the Clyst Valley Regional Park with a managed woodland.

Cat Copse is not situated within any landscape designation (such as AONB) and comprises brownfield land having been put to a range of uses over the years. The site is level and is sited within flood zone 1 (the low risk of flooding).

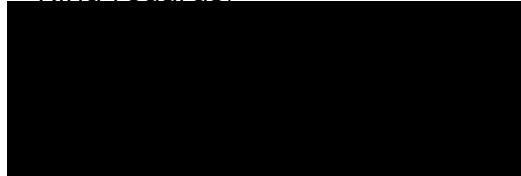
Intrusive ground investigation works were undertaken as part of 15/1833/MOUT. East Devon's Contamination Officer concluded:

*"...I have considered the details submitted regarding land condition, particularly regarding the former animal related uses. I am satisfied that*

*the investigations carried out will enable any contaminated material encountered to be dealt with as appropriate...".*

The development of Cat Copse would enable the provision of affordable housing, housing for the elderly, public open space, woodland enhancement, as well as footpath/ cycle link improvements.

Kind regards,



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

