

ON BEHALF OF LAND VALUE ALLIANCES

**REPRESENTATIONS TO EAST DEVON LOCAL PLAN
2020 – 2040: PREFERRED OPTIONS REGULATION 18
CONSULTATION DRAFT PLAN**

LAND WEST OF WHIMPLE ROAD, BROADCLYST

January 2023

grassroots
PLANNING

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Bristol North Baths
Gloucester Road
Bristol



REPORT CONTROL

Project:	Land west of Whimple Road, Broadclyst
Report Type:	Local Plan Reps
Client:	Land Value Alliances
Our Reference:	710/A3/CC
Date:	11 January 2023
Version:	V2

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1.0 INTRODUCTION

- 1.1 On behalf of Land Value Alliances (LVA), Grass Roots Planning have been instructed to prepare and submit representations to the East Devon Preferred Options Consultation Draft Local Plan (Regulation 18), in respect to land west of Whimble Road, Broadclyst.
- 1.2 Land west of Whimble Road is identified as a 'Preferred Option' for a development of 136 dwellings and 0.54 hectares of employment land (allocation reference Brcl_12). We consider that this site is a suitable location for development in light of the everyday facilities available in Broadclyst itself, as well as the sustainable transport links available to access both Exeter and Cranbrook via cycling and public transport.
- 1.3 LVA have recently secured an agreement with the landowners of this site to promote it for a mixed-use residential and employment development. A technical team has been instructed to ensure that the masterplan is underpinned by detailed evidence – this includes transport, drainage, ecology, landscape, trees, heritage, ground conditions, and urban design.
- 1.4 Having reviewed the constraints and opportunities for the site (Appendix 1), a masterplan has been prepared (Appendix 2) which identifies that 160 dwellings could be delivered within the allocated land parcel (at 30 dwellings per hectare) alongside employment land of 0.6ha, and significant levels of public open space, including community football pitches and allotments if required.
- 1.5 It is anticipated that an outline application, with all matters reserved except for access, will be submitted in Summer 2023. Accordingly, it is hoped that once the Local Plan Examination in Public begins, a pending planning application will be before the Council, which will demonstrate the site's deliverability to the Planning Inspectorate to underpin the allocation of this land.
- 1.6 We have reviewed the draft Local Plan and the technical evidence base associated and have a number of comments to make on various policies throughout the document. We have also set out the benefits of promoting land at Broadclyst for a mixed-use scheme and the work undertaken to date to support the site's development.

2.0 HOUSING NEED

- 2.1 The current East Devon Local Plan proposed 17,100 dwellings over the plan period of 2013-2031 (equating to 950 dwellings per annum). Since the East Devon Local Plan was adopted, the standard method has been implemented in national policy which results in a local housing need of 18,920 dwellings over a 20-year period (946 dwellings per annum) in the East Devon area.
- 2.2 Policy 3 of the draft Local Plan states in strand 1 that ‘at least’ 18,920 dwellings will be delivered, with provision made for a headroom of approximately 10% to provide housing supply flexibility, which equates to provision of 20,800 dwellings. We agree with this approach in principle which complies with the NPPF and is a positive and pragmatic response to housing delivery.
- 2.3 However, Policy 2 – Housing Distribution sets out clearly within the accompanying table to the policy that 18,167 dwellings (908 dwellings) will be delivered over the new plan period – with additional windfalls totalling 2,335 dwellings (117 per annum), giving a total of 20,502 dwellings. Therefore, whilst this exceeds the standard method requirement, it does not meet the 10% headroom to ensure flexibility, choice and competition in the market required by the NPPF and falls short of the Policy 3 figure by 465 dwellings.
- 2.4 Paragraph 3.17 of the draft Local Plan then goes onto state that:
- ‘The policy requirement for provision of at least 18,920 dwellings in the district in the plan period is justified by evidence of local housing need based on the Standard Method, using the latest ONS statistics. To be sufficiently flexible and provide ‘headroom’, forecast supply in East Devon should be 10% above that figure. That equates to about 20,800 dwellings. At this time, **we forecast that there is potential to deliver approximately 20,441 dwellings** in the plan period from the supply categories we count towards meeting the requirement plus headroom. **This includes the potential sites being considered in policies 8, 17, and 19 – 26 in this draft plan.** The forecast potential supply meets the minimum housing requirement of 18,920 dwellings and would provide about 8% ‘head room’.*’
- 2.5 The figures presented in paragraph 3.17 of the emerging plan are based on Table 1 of the supporting evidence paper ‘Housing Need, Requirement and Supply’ – an extract of this table is shown below.

TABLE 1 Forecast housing supply in the plan period by housing supply category

Housing supply category	Dwellings (approximate) Forecast delivery 01/04/2020 to 31/03/2040	Percentage of supply identified
Net completions 01/04/2020 to 31/03/2022*	1,906	9.3
Net commitments at 31/03/2022*	4,389	21.5
Cranbrook DPD Expansion Area allocations	4,170	20.4
New town (delivery by 2040)	2,500	12.2
Urban extension north of Topsham	580	2.8
Tier 1 & 2 - Preferred sites	1,712	8.4
Tier 1 & 2 - 2 nd Choice sites	1,515	7.4
Tier 3 & 4 - Preferred sites	993	4.9
Tier 3 & 4 - 2 nd Choice sites	341	1.7
Forecast Windfalls allowance*	2,335	11.4
DISTRICT TOTAL	20,441	100

Figure 1. Extract of Housing Need, Supply and Requirement Interim Paper

- 2.6 We note paragraph 6.7 of the Housing Need, Supply and Requirement Paper states *‘the reason for the small differences in completions and commitments in Table 1 compared to Table 2 is because Table 1 uses net supply figures (i.e. demolitions and other losses have been taken into account) whereas Table 2 (from the Strategic Policy in the draft plan) uses gross figures’.*
- 2.7 We would suggest in any future iteration of the Local Plan, net figures are used, because gross figures artificially inflate the level of supply that will be achieved and would fail to meet the requirements of paragraph 11b of the NPPF which states that *‘strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses...’* It would also fail to meet paragraph 35 of the NPPF which requires plans to be positively prepared
- 2.8 Based on the evidence in the supporting interim paper on housing need, this suggests that all 2nd choice sites listed in Policy 2 of the Draft Local Plan need to be allocated as well as including an allowance for windfalls. Given that this does not meet the headroom figure of 10%, we suggest that additional land is required to ensure that choice and flexibility in the supply of housing can be made in East Devon. Alternatively, existing preferred options could have their allocated numbers increased where this is realistic – such as land off Whimble Road, which we will go on further to discuss.

Cross-Boundary Working

- 2.9 Although East Devon District Council have withdrawn from the wider Greater Exeter Strategic Plan (GESP), paragraph 2.10 of the East Devon Housing Need & Supply Requirement Interim

Paper states *'nevertheless, there are times when strategic cross-boundary matters are relevant for plan-making. These can include the issues within the Housing Market Area and the Functional Economic Market Area, to which national guidance in PPGs relates. The Greater Exeter HMA is the same area as the Greater Exeter FEMA.'*

- 2.10 We agree with the above statement and are pleased to see EDDC considering adjacent authorities' housing requirements. However, whilst we acknowledge the cross-boundary working taking place, having had a brief review of Exeter City Council's Local Plan, we query the extent of land available to deliver homes in the City, the statements made in the urban capacity assessments, and whether this is realistic. It is our view that EDDC will need to consider an uplift in housing numbers to accommodate some of Exeter's need, or at the very least have a contingency in place to react if that becomes clearer over time – i.e. potentially identify reserve sites to deal with such an outcome.

Economic Growth

- 2.11 Work is still being undertaken on the Economic Development Needs Assessment (EDNA) and at the time of preparing the Housing Need, Supply and Requirement Paper in November 2022, this assessment had still not been provided.
- 2.12 As such, the Council is not yet clear on whether the results of this assessment will necessitate an increase in housing need, due to the number of economically active persons residing in East Devon during the plan period. Paragraph 4.10 goes on specifically to state *'The EDNA results will need to be integrated with the LHNA evidence at a later date. This will assess whether there is evidence relating to economic growth and the ability to house the work force to support the forecast number of jobs that would justify a Local Housing Need figure higher than the scale of housing need identified through the Standard Method.'*
- 2.13 Accordingly, we suggest this work is finalised as soon as possible to feed into the overall assessment of housing need. Without this work and the conclusions it will reach, we struggle to see how the plan can progress any further than this stage given this could have implications for the level of both housing and employment allocations going forwards.

3.0 SPATIAL STRATEGY

- 3.1 We have reviewed the proposed spatial strategy for development and agree with the general principles that it sets out, namely that larger scale development should be directed towards the larger towns first, which have a greater range of facilities. Lower levels of development should then be focused on smaller settlements, as the strategy in the Local Plan sets out:

‘New development will be directed towards the most sustainable locations in East Devon, consistent with spatial strategy to:

- *Focus new development on the western side of the district, including a new town and other major strategic developments close to Exeter*
- *Promote significant development at the Principal Centre of Exmouth and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton and Sidmouth to serve their own needs and that of the wider surrounding areas*
- *Support development at the Local Centres of Broadclyst, Budleigh Salterton, Colyton, Lymptstone, and Woodbury that meets local needs and those in the immediate surroundings*
- *Allow limited development to meet local needs at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.’*

- 3.2 Paragraph 3.4 of the draft Local Plan *‘a key part of the spatial strategy is to outline the settlement hierarchy, grouping settlements together where they share similar characteristics and placing them in different tiers. Settlements with a higher population and a greater range of jobs, community facilities and services serving a wide area are placed at the top of the settlement hierarchy; whilst smaller settlements that have fewer jobs and facilities perform a more local, but still important, role are grouped lower down the hierarchy.’* We agree with this approach.

- 3.3 We have reviewed Topic Paper 1a – Role and Function of Settlements (RFS) in respect to Broadclyst and broadly agree with the evidence that underpins the spatial strategy set out in the draft Local Plan.

- 3.4 Figure 2.1 of the paper provides a list of settlements with their population estimates and age profile – within Broadclyst, it is estimated that 60% of the total population (947 out of 1,583 people) is estimated to be of working age (16 – 64). Paragraph 2.11 states *‘Cranbrook also has one of the highest proportions of working age people aged 16-64 (62%) – other*

settlements with a proportion over 60% are Exton, Broadclyst, Woodbury Salterton, Colaton Raleigh, Clyst Honiton and Brampford Speke. This suggests either a high level of jobs at these settlements, or that they are within an easy commute to jobs elsewhere.’ (our emphasis)

- 3.5 Figure 3.3 of the RFS paper states that of all residents aged 16 – 74 in Broadclyst, 77% are considered to be economically active (791 residents of out 1,026). It also confirms that Broadclyst is a net exporter of employees and employment density is at 0.48 (791 local workers with 381 local jobs available).
- 3.6 Broadclyst lies in close proximity to both Exeter and Cranbrook, as well as the M5. The centre of Exeter is accessible by bus (the number 1 service) which runs every 20 minutes Monday to Friday, with the last bus departing Exeter at 11pm. On the weekends and on Bank Holidays, the bus service is less frequent but still runs every 30 minutes up to 11pm at night to return home. The centre of Exeter is also accessible by bike (approximately a 30-minute cycle), however there are other key employment areas such as the Sowton Industrial Estate which is accessible within a 25 minute cycle, the routes of which are mostly flat and includes the dedicated E2 cycle route.
- 3.7 The centre of Cranbrook and Cranbrook Railway Station is even closer, located circa 15 minutes away by bike (2.9 miles) which provides regular services to Exeter St David’s (a major interchange station) and to London Waterloo.
- 3.8 As such, whilst Broadclyst is a net exporter of workers, the settlement lies in close proximity to key employment areas which are accessible by bike and public transport. There will always be a percentage of people that will choose to travel by car, however in this case longer journeys would be replaced by shorter ones due to the proximity of these larger settlements and the extensive employment offer they provide.
- 3.9 Therefore, we consider that Broadclyst is suitable to accommodate growth and we agree there should be a mixture of housing and employment land to promote self-containment of the area. In our view, this is compliant with the NPPF’s requirement to *‘actively manage patterns of growth’* and focusing on *‘locations which are or can be made sustainable’*.
- 3.10 EDDC have also considered the range of other services and facilities that are available within each settlement – figure 4.1 of the RFS notes the difference between strategic and local facilities and the different roles that these corresponding settlements play. We are in agreement with this premise as it recognises the difference between urban and rural areas, which is compliant with paragraph 105 of the NPPF.

- 3.11 Having reviewed the facilities available in Broadclyst, we agree with those identified by the authority – namely the excellent bus service (which actually runs more frequently than an hourly service), leisure centre, primary school, convenience store, post office, GP, community hall, library, pub, allotments, sports pitches and children’s play area, all of which play a role in supporting the settlement’s self-containment. There is also an employment area within Broadclyst. Land to the west of Whimple Road lies within a suitable walking distance to all of these facilities, as we will go onto discuss.
- 3.12 This leads to the authority stating in paragraph 4.7 of the RSF paper that *‘Budleigh Salterton, Colyton, **Broadclyst**, and Lympstone all have two or three strategic facilities, along with at least 10 of the 11 local facilities, so play a wider than local role’*. We agree with this statement.
- 3.13 Broadclyst was originally identified as a Tier 4 settlement, however we agree with EDDC that following the evidence gathered regarding the availability of facilities within the settlement which are significant given its scale, it should be moved up to a Tier 3 settlement suitable for growth.
- 3.14 Overall, therefore, we are in agreement with EDDC’s assessment of the suitability of Broadclyst for growth and its overall role in the settlement hierarchy.

4.0 DISTRICT-WIDE POLICIES

- 4.1 We have reviewed a number of policies set out within the draft Local Plan and have some comments on their suitability and wording in respect to the draft plan.

Net-Zero Carbon Development

- 4.2 We note policy 28 of the draft Local Plan states the following:

‘All new residential and commercial development will deliver net-zero carbon emissions. Developers will be required to submit a ‘carbon statement’ to demonstrate how this will be achieved, in accordance with the energy hierarchy.... Finally, there will be a requirement for major development to calculate the whole life-cycle carbon emissions, through a nationally recognised Whole Life Cycle Carbon Assessment’.

- 4.3 Whilst the above policy is laudable, recent building regulation changes coming into effect in 2023 means that all new dwellings will have significantly improved fabric efficiency, EV charging points, solar panels and/or Air Source Heat Pumps (the latter of which is due by 2025). The changes to these building regulations means that new build properties will be capable of being net zero in terms of their ongoing emissions and therefore we question the necessity of this policy which in turn will simply lead to further work being required to support a planning application to cover an issue that is more appropriately controlled via building regulations.
- 4.4 With respect to the requirement for a ‘Whole Life Cycle Carbon Assessment’ on major developments, the policy wording is unclear as to whether it is expected for this assessment to reflect net-zero carbon emissions in terms of the build. We would suggest that if this is the case, there needs to be clearer wording in the policy to reflect this and a transition period set out for all new-build development to adhere to. This allows time for developers to consider new technologies and building methods to order to achieve net zero build emissions, which will be a significant step, whilst also ensuring that homes are delivered to meet housing need in the interim.
- 4.5 Finally, we note that no viability testing has been undertaken to support this policy which gives cause for concern as to whether its application will lead to sites being unviable. As such, we suggest this work is urgently undertaken to support the Local Plan to ensure that sites are deliverable and the policy is justified, in accordance with NPPF paragraph 35.

Affordable Housing

- 4.6 We note that under Policy 40, it is anticipated that 35% affordable housing will be required across all sites outside of the 'new town' allocation. Whilst we do not object to the level of AH provision required, we urge the Council to undertake viability testing as soon as possible to ensure that this will not adversely impact upon the deliverability of sites.

Accessible & Adaptable Housing

- 4.7 Policy 42 sets out that 100% of all new dwellings should meet building regulation M4(2) requirements. Whilst we agree that a proportion of new builds should meet this requirement, we have concerns in respect to the size of properties that this would produce and delivering a mix of homes on site, how this will affect density requirements, and the impact on viability. It may not be possible, for example, to achieve 100% M4(2) due to the topography of a site and engineering levels and this needs to be considered in more detail from a design and build perspective. In the very minimum, flexibility needs to be built into the policy that allows developers to demonstrate in some cases why this level of M4(2) may not be achievable.
- 4.8 Consideration also needs to be given to viability and how this will impact the deliverability of sites across EDDC.

Market Housing Mix

- 4.9 We are concerned that there is insufficient flexibility set out in Policy 43 in respect to open market mix. Whilst the LHNA is up-to-date currently, the plan could be in effect for 20 years and market conditions could change significantly during this period. Whilst we note strand 5 of the policy sets out that evidence can be provided to justify a different open market mix, the wording of the policy states that this will only be accepted in 'exceptional' circumstances. We consider that this does not provide sufficient flexibility as required by the NPPF.

Self-Build and Custom Build Housing

- 4.10 Policy 44 sets out the requirement for self-build and custom housebuilding on major development sites. However, the policy wording needs clarity as currently it is not clear whether the 5% requirement relates to the overall numbers on site or just the market housing element of the scheme. We would suggest that the policy is worded to make clear that this reflects 5% of market housing only.
- 4.11 We also have significant concerns with part i) of Policy 44 which requires self or custom builders to have completed their development plot within 3 years. We do not see how this

can be reasonably enforced or conditioned, and in light of unforeseen market circumstances (such as COVID-19), we do not consider that this is reasonable. Given that self-builders are unlikely to be experienced in housebuilding, a 3 year limit is a short timeframe for completion and greater consideration should be given to the wording of this policy.

Biodiversity Net Gain

- 4.12 Policy 87 of the draft Local Plan states that a 20% Biodiversity Net Gain (BNG) will be achieved on development proposals. Whilst again the Council's aspirations are laudable, Central Government has set the national policy to 10% based on significant evidence and rounds of consultation undertaken with various stakeholders. Achieving 10% BNG is already a significant challenge faced by developers and without a s106 mechanism in place (which is not available in EDDC), this could seriously affect the viability of sites across the District, and/or lead to housing targets not being met due to land-take required for mitigation for net gain. As such, we suggest that the Council reverts their BNG policy to 10%.

5.0 LAND WEST OF WHIMPLE ROAD, BROADCLYST

- 5.1 To date, no specific representations have been submitted to the authority to promote the site for allocation, however the site was submitted as part of the HELAA process in 2021. We can confirm that the land is available for development, and, as set out in the introduction, LVA have an agreement with the landowners to promote land west of Whimple Road for a mix of residential and employment development. As such, we anticipate submitting a planning application later this year which will be supported by technical evidence that will underpin the site's allocation.
- 5.2 A technical team has been instructed to prepare evidence to underpin the site's masterplan and deliverability, including highways, ecology, drainage, landscape, trees, heritage, ground conditions and urban design. This continues to inform the masterplan, however, a constraints and opportunities plan, and emerging masterplan, is provided in Appendices 1 and 2 respectively.
- 5.3 A brief outline of the site, alongside technical issues, is provided below.

The Site

- 5.4 The site lies to the east of Broadclyst and comprises an array of agricultural fields which are bound and intersected by hedgerows. Access is provided from Whimple Road, however there is also a Public Right of Way (PRoW) present (footpath 31) which provides a link from the site out to the west, into the centre of Broadclyst, as shown below on figure 2. This provides access to key facilities includes the GP surgery, post office/shop, playing fields and primary school, all of which lie within less than 10 minute walk from the site.
- 5.5 The site is relatively flat and there are some short and medium range views out to the north. Electricity pylons cross the land and there is a small collection of farm buildings within the site, none of which are listed. Both Broadclyst Conservation Area and a number of listed buildings lie to the west of the site on Town End road – these are predominantly Grade II with the exception of a single Grade II* listed building (Marker's Cottage) which lies to the north-west.



Figure 2. Site Aerial (site shown in red, footpath shown in yellow)

Emerging Masterplan

- 5.6 As can be seen in Appendix 2, a site masterplan has been prepared based on the constraints and opportunities of the site. This shows the following level of development:
- 160 dwellings (including affordable housing and self-build plots)
 - Courtyard of residential compatible employment (Use Class E – start up workshops, offices, etc.) providing a total of 0.6ha of land
 - Vehicular access from Whimple Road
 - Pedestrian and cycle links to existing footpath network
 - Structural planning to strengthen existing site boundary features
 - Attenuation basins
 - Playing pitch and allotments, if required
- 5.7 Given the scale of the site (circa 12 hectares), and in order to achieve sufficient density on the land for housing (30dph), we suggest that draft policy 25 should be amended to increase the number of homes from 136 dwellings to 160 dwellings, which is considered to be a more appropriate level of development. LVA are also flexible in terms of the mix of housing to be provided on site, including (for example) bungalows, if the authority so desires it – as well as self-build and smaller units.
- 5.8 As set out above the development of the site could also bring new community benefits, such as a new playing pitch and allotments, if required. A farmyard style barn complex of employment uses is also shown on the site which would lend itself well to SME businesses and promote self-containment of Broadclyst.

5.9 Given we have identified that the allocations proposed do not meet the overall housing requirement and a 10% headroom, there is option in this location to further increase the level of housing on this site and we would welcome discussions with the LPA as to whether this would be acceptable or not.

Highways

5.10 Access from Whimble Road can be achieved with good visibility, subject to the removal of a small section of hedgerow. Our highways consultant has considered the overall level of movements from a development of 160 – 180 dwellings in this location which would result in 1-2 car movements per minute during the peak hours; however, as set out, there are good options for both cycling and public transport to reach Exeter and Cranbrook and the site is accessible to everyday local facilities and services.

Flood Risk & Drainage

5.11 The majority of the site lies within Flood Zone 1, as an extract of the Government’s Flood Maps for Planning show below. A small section of the site lies within Flood Zone 2 (the north-east of the site) and as such development has not been proposed in this location, which will instead form part of Public Open Space.

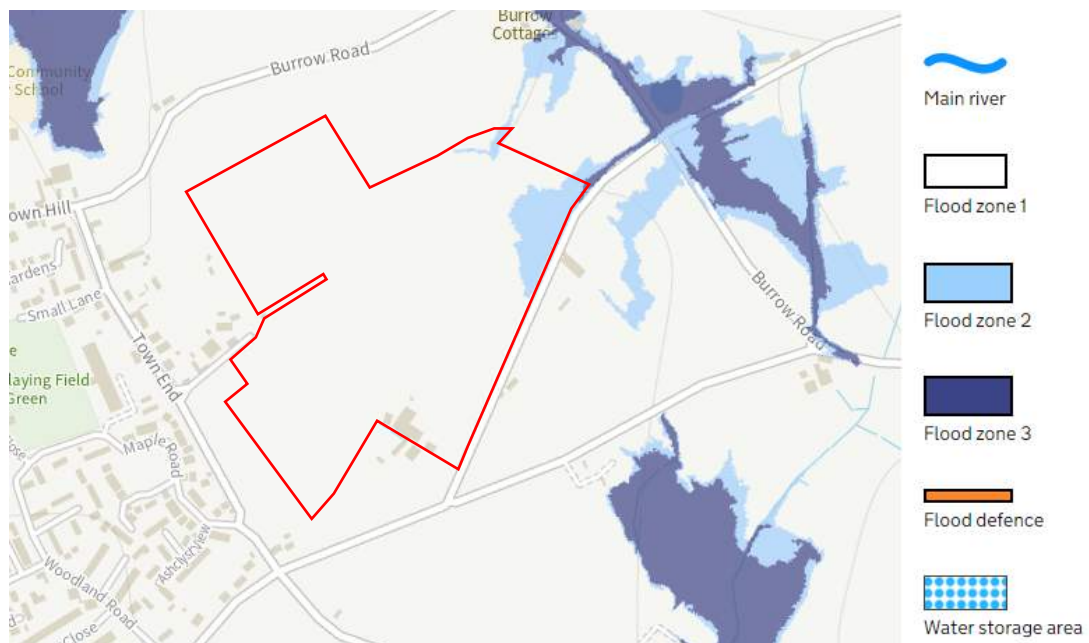


Figure 3. Flood Maps for Planning (site shown in red)

5.12 Surface water will be dealt with via SuDS and infiltration testing will be undertaken shortly to determine whether this is a suitable method of draining the site. However, as shown on the

masterplan, attenuation basins have been incorporated within the masterplan on the lower parts of the site to show how this would be delivered.

- 5.13 As such, there are currently no barriers to development in flood risk terms.

Landscape

- 5.14 Although some short-range views will be affected (such as the experience from the PRoW), the site is visually self-contained and buffer planting can easily be incorporated to screen the development from view. As shown on the masterplan the hedgerow network is also shown as retained to reflect the historic field pattern.
- 5.15 Our landscape consultant has visited the site and has confirmed that there are no significant viewpoints or designations which would result in significant landscape impacts which would preclude the site's development.

Heritage

- 5.16 Both the Broadclyst Conservation Area and a number of listed buildings lie to the west of the site, the latter of which are predominantly Grade II listed, with the exception of one property which is Grade II* listed. These have already been considered within the emerging masterplan which seeks to pull back development from these buildings. A sensitive design approach can be adopted for dwellings nearest to these listed buildings to ensure that materials used are appropriate.

Noise

- 5.17 Given the proximity of Exeter Airport, a noise assessment will be undertaken to ensure that no residents of future dwellings will be adversely affected by noise.

Ecology

- 5.18 Survey work undertaken to date on the site has not identified any significant constraints to development and it is anticipated that Biodiversity Net Gain, significantly in excess of the 10% requirement, could be achieved on this site. Additional ecological surveys for dormice, bats, reptiles, badgers and Great Crested Newts are being undertaken over the summer of this year and will further inform the masterplan as time goes on.
- 5.19 Finally, the site does not lie within the River Axe Catchment and as such, does not need to consider phosphates or nutrient neutrality as part of its scheme design.

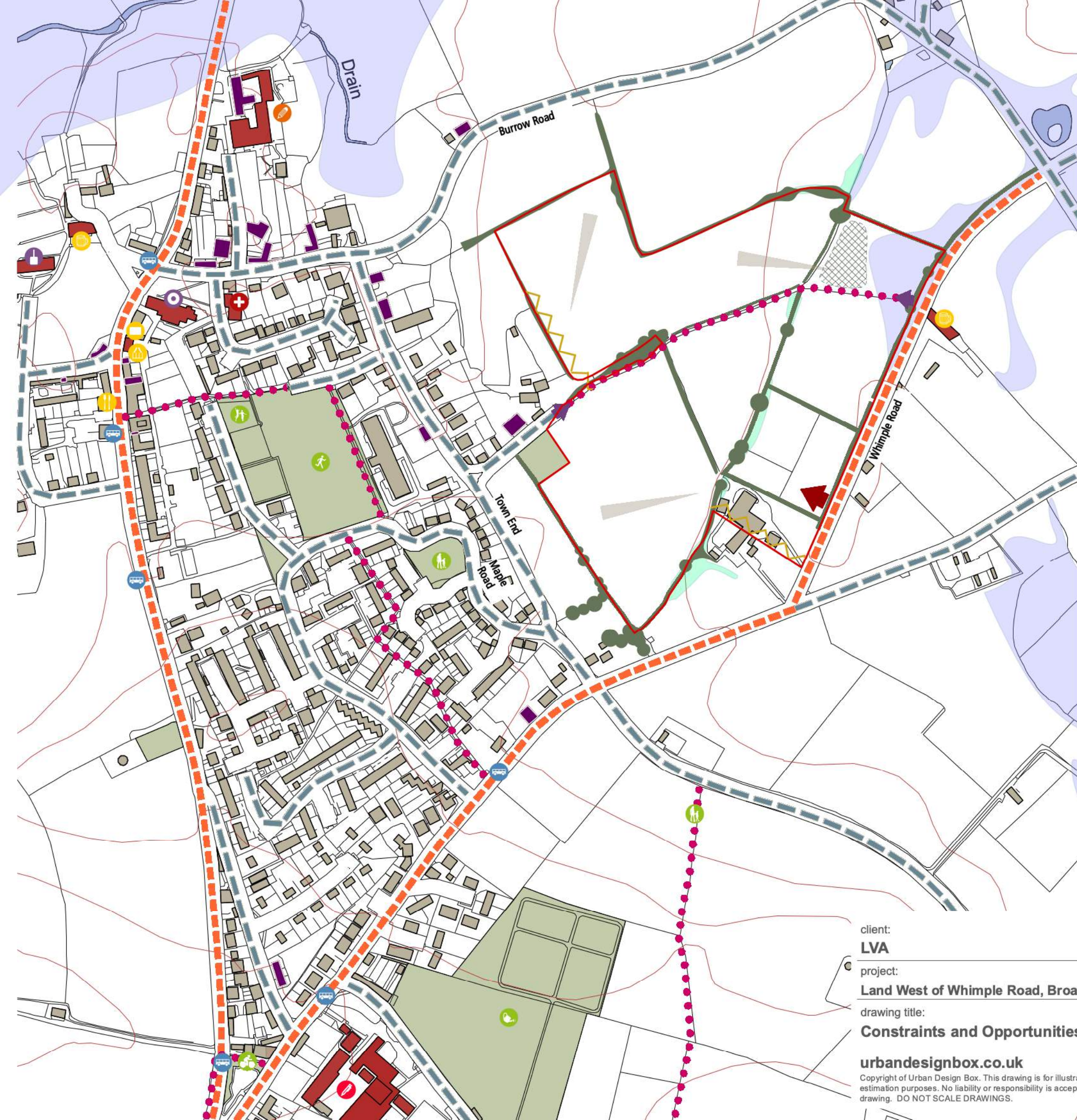
Conclusion

- 5.20 Overall, the site has limited constraints for development and the technical work undertaken to date has not identified any significant issues which would preclude the site from development. Accordingly, the technical team are preparing evidence to further underpin the site's deliverability and masterplan, to demonstrate that the delivery of 160 dwellings, employment space and community POS is achievable – this will result in the submission of a planning application, likely in Summer 2023.

6.0 CONCLUSIONS

- 6.1 In conclusion, we consider that the Local Plan is making good progress and the evidence base produced to date underpins a suitable strategy for development.
- 6.2 The key issues that we respectfully request the authority to consider are the following:
- Whether the outcome of the Economic Needs Growth Assessment will necessitate an increase to housing numbers;
 - That the authority ensures that a 10% headroom is achieved through the allocation of sites or an increase in numbers and/or density on currently proposed allocations;
 - How proposed policies will affect the viability of schemes going forward – in particular prescribed open market mix, M4(2), affordable housing and net-zero carbon requirements; and
 - Clarity on self-build provision and the % required on schemes.
- 6.3 For the reasons set out, we agree that Broadclyst is a sustainable option for moderate growth, given its good links via cycling and public transport to both Cranbrook and Exeter. Broadclyst also has a good range of local facilities and services which can be strengthened through increased footfall from the provision of additional housing; and as such, we consider that this strategy aligns with the NPPF in promoting growth in areas where there are suitable transport links.
- 6.4 Lastly, we consider that land east of Broadclyst is a suitable option for growth given its limited constraints. Having prepared initial constraints and opportunities for the land it is considered that the site could deliver up to 160 dwellings (including affordable and self-build), 0.6 hectares of employment land, as well as significant public open space including community pitches and allotments, if required. The site would also deliver in excess of 10% BNG which is a significant benefit of the scheme.
- 6.5 As such, we look forward to further discussions with the Council about the allocation of this land and the technical work underpinning its deliverability.

Appendix 1 – Constraints & Opportunities Plan



legend

- Site boundary
- Potential future residential phase
- Potential all modes access
- Potential pedestrian access
- Existing pedestrian rights of way
- Nearby bus route / stop
- Adjacent road network
- EA Flood map Zone 2/3
- Isolated areas of surface water flood risk
- Potential SUDS locations
- Existing planting / hedges
- Existing trees
- Direction of downwards slope
- Boundary to neighbouring properties - amenity distances to consider
- Boundary to open land to consider
- Adjacent buildings
- Broadclyst Conservation Area (outside site)
- Community use
- listed buildings

local facilities

- food shops
- public house
- restaurants / take away
- sports facilities / open space
- play facilities
- allotments
- recreational walking
- cycle route to Pinhoe
- medical centre
- secondary education
- primary education
- place of worship
- community centre
- bus stop

DRAFT

client:
LVA

project:
Land West of Whimple Road, Broadclyst

drawing title:
Constraints and Opportunities

job number:
LVA104

scale:
1:4000 @ A3

date:
September 2022

drawing number:
2001

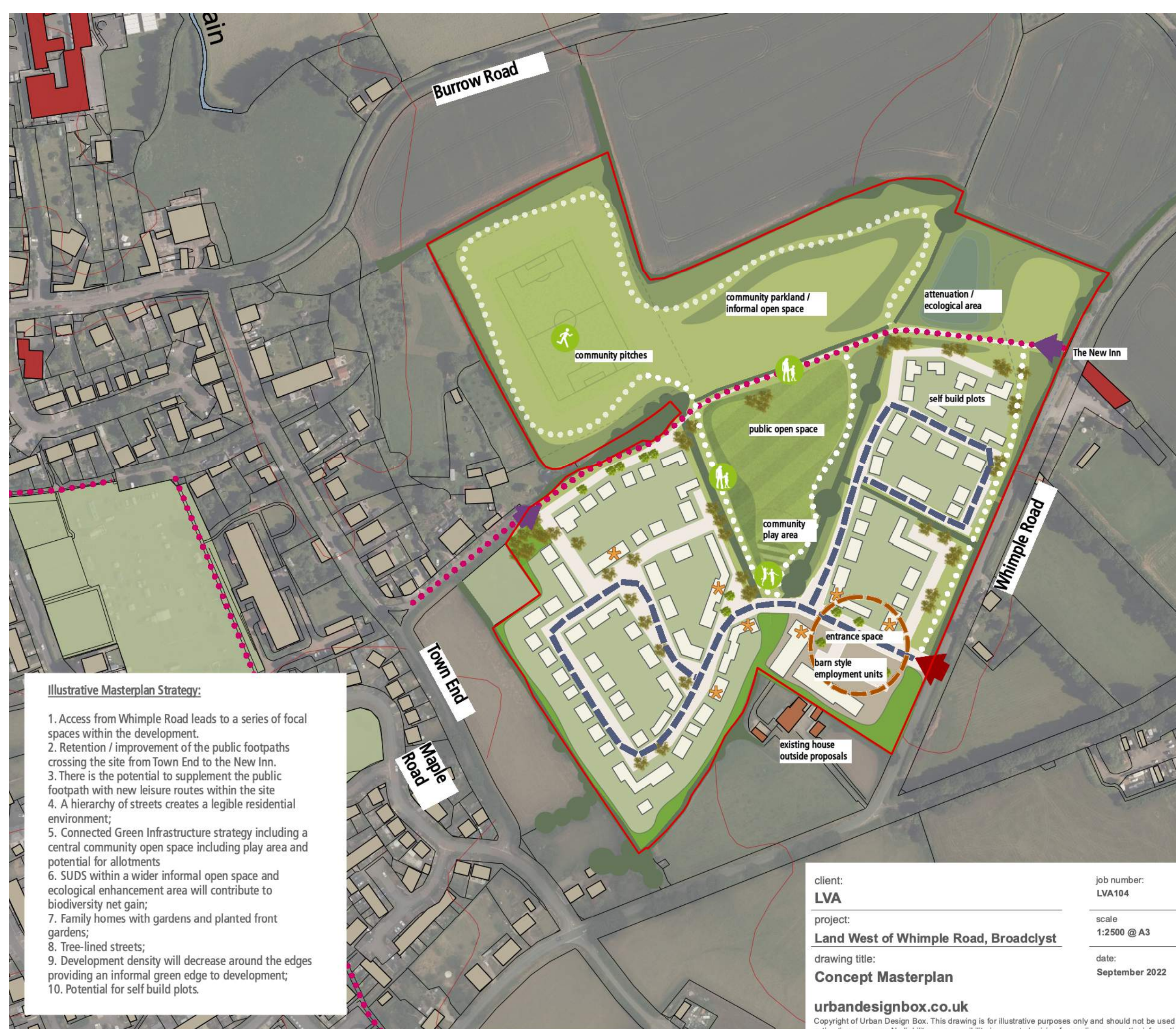
drawn:
jvs

status:
Preliminary

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Appendix 2 – Emerging Masterplan



- Legend**
- Site boundary
 - Potential all modes access
 - Potential pedestrian access
 - Existing public right of way / proposed pedestrian route
 - Proposed principle route within development
 - Potential focal buildings
 - Potential Development Focus
 - Residential Development
 - Employment Development
 - Public Open Space including SUDS and Strategic Landscape areas
 - Potential SUDS
 - Potential strategic green neighbourhood corridors connecting to open spaces
 - Existing hedges / trees / planting
 - Proposed trees / planting areas
 - Outdoor recreation
 - Walking routes
 - Play areas

Schedule of Masterplan Areas:

Gross Site Area: (red line)	12.03ha
Net Residential Development: (160 homes@30/ha)	5.3ha
Employment Development:	0.6ha

Illustrative Masterplan Strategy:

1. Access from Whimble Road leads to a series of focal spaces within the development.
2. Retention / improvement of the public footpaths crossing the site from Town End to the New Inn.
3. There is the potential to supplement the public footpath with new leisure routes within the site
4. A hierarchy of streets creates a legible residential environment;
5. Connected Green Infrastructure strategy including a central community open space including play area and potential for allotments
6. SUDS within a wider informal open space and ecological enhancement area will contribute to biodiversity net gain;
7. Family homes with gardens and planted front gardens;
8. Tree-lined streets;
9. Development density will decrease around the edges providing an informal green edge to development;
10. Potential for self build plots.

DRAFT

client:
LVA

project:
Land West of Whimble Road, Broadclyst

drawing title:
Concept Masterplan

urbandesignbox.co.uk

job number:
LVA104

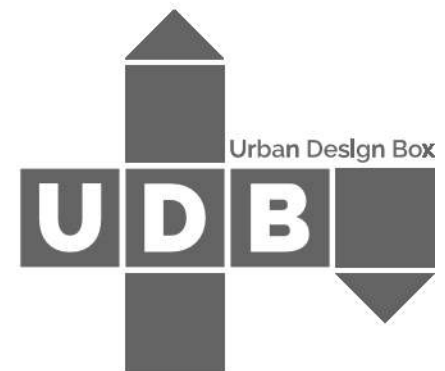
scale:
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date:
September 2022

drawing number:
3001

drawn:
jvs

status:
Preliminary



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