

Your Ref
Our Ref DS/SJS/
Date 13th January 2023



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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.

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).

Perhaps a better way to try to address the issue is via the encouragement of home working (i.e. the inclusion of a study/hobby room/area(s). This would mean a greater likelihood of the workers and the residents being one in the same.

Policy 40 - Affordable Housing

Whether the level of affordable housing sought, at 35%, is reasonable needs to be justified and, to date, no viability evidence has been produced to support this position. Accordingly, it should be 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.

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).

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).

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

Lympstone Sites

We support the plan making allocations in tier 3 settlements, especially where those settlements are well located in relation to larger settlements (such as Exeter and Exmouth), and particularly where there are sustainable transport linkages. Lympstone is well served by a rail station and bus services. The villages have been under provided for in past Local Plans and therefore appropriately sized allocations such as GH/ED/73 are needed to deliver local housing needs and to support the vibrancy of villages and their services.

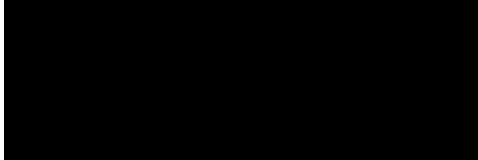
GH/ED/73

Therefore, we support the proposed allocation of GH/ED/73. This site represents sensible 'rounding off' of the settlement. This site is also well contained by roads and the settlement boundary.

However, the site is not particularly suitable for the inclusion of an element of employment use (which would be incongruous in this village setting). It is questionable as to why an employment provision at the site is considered to be necessary or beneficial, because residents of the proposed housing would have easy access to employment via train in Exmouth (4 minute train journey) and Exeter (25 minute train journey). Furthermore, the site is located 1.5 miles away from the Woodbury Business Park, which is an easy cycle ride away.

The site is available for early delivery by 3 West (a locally based SME developer with offices in Woodbury) who intend to deliver the site using their local trade partners, thereby securing local jobs.

Kind regards,



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

