

**Your Ref**  
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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 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.

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 do consider 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.

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.

### *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).

Bearing in mind 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 1<sup>st</sup> and 2<sup>nd</sup> choice sites in order to achieve this.

By contrast, Axminster, which is in an inherently less sustainable location (since it is not linked by rail or 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 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).

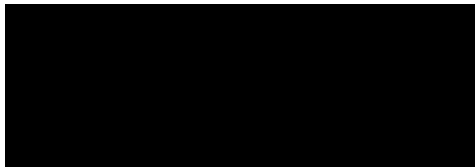
It also has the effect of displacing those in housing need and placing a strain on family ties (e.g. meeting housing needs arising in Exmouth at Cranbrook).

### **Site Comments**

#### *Lympstone Sites*

We support the proposed allocation of GH/ED/75. This site represents a sensible 'rounding off' of the settlement.

Kind regards,



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

