



Broadclyst Parish Council
GROWING OUR COMMUNITY

Broadclyst Parish Council



24.03.2025

EDDC Local Plan 2020-2042 Regulation 19 consultation

Broadclyst Parish Council Letter of Representation

Contents

1. Chapter 1: Housing allocations	2
2. Chapter 2: Affordable housing needs.....	4
3. Chapter 3: Sustainability principles.....	6
4. Chapter 4: Infrastructure Capacity and Sustainability	8
5. Chapter 5: Gypsy and Traveller provision	11
6. Chapter 6: Clyst Valley Country Park	14
7. Conclusion	15

Introduction

Broadclyst Parish Council welcomes the opportunity to respond to the East Devon District Council (EDDC) Local Plan 2020-2042 Regulation 19 consultation. This representation reflects our commitment to sustainable development that meets local housing needs while safeguarding the parish's distinct rural character, heritage, and environmental assets. We have framed our response within the principles of the National Planning Policy Framework (NPPF, 2023), aligning with its emphasis on sustainability, infrastructure-led development, and community engagement.

At the time of submitting this representation, Broadclyst Parish Council is awaiting a response to a formal letter sent to EDDC (dated 28 February 2025), requesting meaningful engagement on housing allocations, particularly concerning the Winter Gardens (Brcly_12) site. This letter outlines concerns about infrastructure capacity, the need for proportional growth, and the importance of community involvement in shaping development. We stress that effective dialogue between EDDC and the Parish Council is essential to ensure that any proposed growth aligns with the principles of sustainable development and respects the unique characteristics of Broadclyst Parish.

1. Chapter 1: Housing allocations

Introduction Broadclyst Parish Council welcomes the opportunity to respond to the housing allocation policies set out in the East Devon Local Plan 2020-2042 (Regulation 19). We recognise the need for well-planned, sustainable housing development that meets local needs while protecting the parish's distinctive rural character, heritage, and natural environment. Our response is framed within the principles of sustainable development as set out in the National Planning Policy Framework (NPPF, 2023), particularly paragraphs 7-14, which outline the presumption in favour of sustainable development.

1.1. Strategic Policy SP02: Levels of Future Housing Development The housing target outlined in SP02 must reflect genuine local housing need rather than be driven purely by national housing targets. While the plan acknowledges the government's housing requirements, it should ensure that development is proportional, environmentally sustainable, and supported by appropriate infrastructure, in line with NPPF paragraph 11, which states that housing policies should be positively prepared and justified by local evidence.

We note that significant growth is focused on the West End, including Broadclyst Parish. While we support planned growth, there must be guarantees that infrastructure—including roads, public transport, education, healthcare, and green spaces—keeps pace with housing delivery. NPPF paragraph 20 emphasizes the need for strategic policies to provide an integrated approach to housing and infrastructure planning, ensuring that developments are viable and deliverable.

1.2. Strategic Policy SD07: Development Allocations at Broadclyst. Broadclyst has been identified for further development under SD07, and we have several concerns regarding the scale and impact of new housing allocations:

1.2.1. Infrastructure Deficiencies: The Broadclyst Neighbourhood Plan (NP) identifies current shortfalls in road capacity, public transport, and community facilities. Development should not proceed without clear commitments to deliver these improvements, in line with NPPF paragraph 72, which requires new developments to be supported by necessary infrastructure. Furthermore, Devon County Council is in the process of producing its Local Cycling and Walking Infrastructure Plan (LCWIP), which should be integrated into development proposals to ensure active travel options are fully embedded.

1.2.2. Affordable Housing: A high proportion of genuinely affordable housing is needed to support local families and key workers. NPPF paragraph 62 highlights the importance of ensuring affordable housing meets local needs. The Local Plan should ensure that affordable homes are delivered on-site rather than via commuted sums.

1.2.3. Heritage and Landscape Sensitivity: The village has a rich historical and ecological character. Development must be sensitively planned to protect heritage assets, green spaces, and biodiversity corridors, as outlined in Broadclyst NP policies and supported by NPPF paragraphs 174-177, which emphasize the protection and enhancement of the natural and historic environment.

1.3. Strategic Policy HN02: Affordable Housing We support the requirement for a minimum affordable housing provision. However, this should be strengthened to ensure:

- 1.3.1. A mix of tenures, including social rent, shared ownership, and low-cost homeownership, in line with NPPF paragraph 65
- 1.3.2. Affordability criteria linked to local income levels rather than national averages, ensuring genuine accessibility for local residents.
- 1.3.3. A requirement that affordable homes remain available for local people in perpetuity, supported by NPPF paragraph 78, which encourages rural housing policies to meet local needs.

1.4. Strategic Policy HN10: Rural Housing Exception Sites We welcome policies that facilitate small-scale rural exception sites to meet local housing needs. However, these sites must be carefully planned to avoid speculative development under the guise of affordability. NPPF paragraph 80 provides guidance on rural housing, stating that development should reflect local needs and contribute positively to rural communities.

1.5. New Community Proposal (WS01) The proposed new community between the A30 and A3052 requires further scrutiny. Lessons must be learned from the development of Cranbrook to ensure that:

- 1.5.1. Infrastructure is in place before or alongside housing, as required by NPPF paragraph 73, which states that large-scale developments should be well-planned and phased appropriately.
- 1.5.2. The community is designed with sustainable transport links, aligning with NPPF paragraphs 104-106, which promote active travel and public transport integration. The Devon LCWIP should be referenced as a key guiding document for ensuring safe and effective walking and cycling routes.
- 1.5.3. There is genuine local engagement in shaping its development, as per NPPF paragraph 16, which emphasizes the importance of community involvement in plan-making.

1.6. Chapter One Conclusion Broadclyst Parish Council supports sustainable housing growth that meets local needs while safeguarding our environment and heritage. We urge East Devon District Council to ensure that development is infrastructure-led, community-focused, and aligned with the principles set out in the Broadclyst Neighbourhood Plan.

Furthermore, policies should fully integrate NPPF guidance to ensure sustainable, well-balanced growth.

Additionally, we recommend that the Devon County Council LCWIP be fully considered in all new housing allocations to ensure sustainable travel options are embedded from the outset.

2. Chapter 2: Affordable housing needs

Introduction

Affordable housing is a cornerstone of Broadclyst Parish’s long-term vision for a thriving and inclusive community. With rising house prices and increasing demand, many local residents—particularly young families, key workers, and those on lower incomes—struggle to find suitable and secure housing within the parish. Ensuring access to affordable homes is therefore essential to maintaining Broadclyst’s strong community identity, supporting local businesses, and preventing the displacement of long-standing residents.

The Broadclyst Neighbourhood Plan (NP) recognises the urgent need for affordable housing and sets out locally specific policies to ensure that new developments meet this demand. These policies go beyond the district-wide approach, requiring a higher proportion of affordable homes, prioritising local occupancy, and promoting a mix of tenures, including social rent, shared ownership, and self-build opportunities. The Broadclyst NP also advocates for well-designed, sustainable homes that are integrated within the wider community, ensuring that new developments enhance the parish’s character rather than compromise it.

By setting clear expectations for affordability, quality, and sustainability, this chapter of the Local Plan, in alignment with the Broadclyst NP, aims to deliver housing that supports Broadclyst Parish’s social and economic resilience. Through a combination of strategic site allocations, rural exception sites, and innovative housing solutions, Broadclyst Parish Council is committed to shaping a future where everyone, regardless of income, can find a place to call home.

2.1. Affordable Housing Targets

- 2.1.1. Strategic Policy HN02 (Affordable Housing) – Requires a minimum of 35% affordable housing on most major developments, with 25% in Axminster. Exceptions apply where viability evidence demonstrates this is unachievable.
- 2.1.2. Broadclyst NP Policy H4 (Social and Affordable Housing) – States that at least 50% of homes on allocated sites in Broadclyst Parish should be affordable, split equally between social rent and affordable ownership.

2.2. Affordable Housing Design & Integration

- 2.2.1. Policy HN02 – Requires that affordable housing should be indistinguishable from market housing and integrated within developments.
- 2.2.2. Broadclyst NP Policy H4 – Emphasizes that affordable homes must be high quality, well-designed, and mixed throughout developments, avoiding clustering.

2.3. Ensuring Affordability & Local Occupancy

- 2.3.1. Policy HN10 (Rural Housing Exception Sites) – Requires that 66% of homes on rural exception sites must be affordable and retained in perpetuity.
- 2.3.2. Broadclyst NP Policy H4 – Introduces local connection criteria, prioritising Broadclyst Parish residents or those with strong ties to the area.

2.4. Viability Considerations

- 2.4.1. Policy HN02 – Allows developers to submit viability assessments if they cannot meet the full affordable housing requirement.

- 2.4.2. Broadclyst NP Policy H4 – Acknowledges viability challenges and allows for some market housing where necessary to facilitate affordable housing delivery.

2.5. Rural Exception Sites

- 2.5.1. Strategic Policy HN10 – Encourages small-scale rural exception housing to meet local needs, with a requirement for a minimum of 66% affordable housing.
- 2.5.2. Broadclyst NP Policy H5 (New Housing in Broadclyst Parish) – Supports rural housing development where it directly meets local need.

2.6. Specialist Housing Needs

- 2.6.1. Policy HN03 (Housing for Older People) – Requires developments to provide age-friendly, adaptable homes.
- 2.6.2. Policy HN05 (Self-Build and Custom-Build Housing) – Promotes the inclusion of self-build and community-led housing projects.
- 2.6.3. Broadclyst NP Policy H6 (Self-Build Housing) – Allocates land for self-build plots to support local people wishing to construct their own homes.

2.7. Chapter 2 Conclusion

Ensuring the delivery of genuinely affordable housing is central to Broadclyst Parish's vision for a sustainable and inclusive community. The Broadclyst Neighbourhood Plan (NP) sets ambitious yet locally focused targets to address affordability challenges, prioritising housing that meets the needs of local residents, key workers, and young families. By requiring a higher proportion of affordable homes in new developments and ensuring these homes remain available to those with local connections, Broadclyst Parish aims to maintain its strong sense of community and prevent displacement due to rising housing costs.

The integration of affordable homes within well-designed, mixed-tenure developments will support social cohesion and enhance the quality of life for all residents. Additionally, the Broadclyst NP's commitment to rural exception sites, self-build opportunities, and adaptable housing ensures that the diverse needs of the parish, including those of older people and those requiring accessible accommodation, are met.

By aligning with the broader East Devon Local Plan while reinforcing local priorities, these policies provide a framework for delivering high-quality, affordable housing that supports Broadclyst Parish's long-term sustainability. Through proactive planning and ongoing engagement, the parish seeks to create a future where housing remains accessible to those who contribute to and enrich the local community.

3. Chapter 3: Sustainability principles

3.1. Climate Change Mitigation and Adaptation

3.1.1. Net-Zero Carbon Development (Strategic Policy CC02)

The Local Plan commits to achieving net-zero carbon emissions in all new developments. This includes:

- Requirements for high energy efficiency standards in construction (beyond current Building Regulations).
- Promotion of zero-carbon energy sources, such as solar panels, air-source heat pumps, and district heating (Strategic Policy CC05).
- Encouragement of low-embodied-carbon materials and local sourcing of construction materials (Policy CC06).

3.1.2. Low-Carbon and Renewable Energy (Strategic Policy CC03 & Broadclyst DC6)

- The plan prioritises renewable energy generation, with a focus on solar farms, onshore wind projects, and battery storage.
- The Broadclyst Neighbourhood Plan (Policy DC6) supports community-led renewable energy projects, ensuring energy security and affordability.
- New developments must incorporate passive solar design and low-energy building techniques.

3.1.3. Flood Resilience and Sustainable Drainage (Strategic Policy AR01 & Broadclyst DC3)

- Given the increasing risks of extreme weather, the Local Plan requires sustainable urban drainage systems (SuDS) for all developments.
- Broadclyst's Policy DC3 strengthens this by requiring SuDS to be biodiversity-positive, integrating wetlands and reed beds into drainage infrastructure.
- Developers must account for future climate scenarios in flood-risk assessments.

3.2. Sustainable Housing and Development

3.2.1. Genuinely Affordable and Social Housing (Strategic Policy HN02 & Broadclyst H4)

- At least 40% affordable housing is required on major developments (HN02).
- Broadclyst's Policy H4 reinforces this, requiring affordable housing to be genuinely accessible to local people, ensuring viability for first-time buyers.
- Specific support for Community Land Trusts (CLTs) to deliver housing tailored to local needs.

3.2.2. Self-Build and Custom-Build Housing (Strategic Policy HN05 & Broadclyst H6)

- The plan encourages self-build housing as a sustainable way to promote local economic growth and low-carbon construction methods.
- Broadclyst's Policy H6 provides specific plots for self-builders, supporting local trades and craftsmanship.

3.2.3. Housing Density and Design Quality (Strategic Policy DS02 & Broadclyst D1)

- The Local Plan requires compact, energy-efficient housing layouts to reduce land take.

- Broadclyst NP's Policy D1 ensures that housing integrates heritage character, biodiversity-friendly landscaping, and high thermal performance (Passivhaus standards where possible).

3.3. Sustainable Transport and Accessibility

3.3.1. Prioritising Active and Public Transport (Strategic Policy TR01 & Broadclyst T4, T5)

- The Local Plan mandates that all new developments prioritise walking, cycling, and public transport over car travel.
- Broadclyst's Policy T4 requires comprehensive cycling infrastructure, including safe crossings and cycle storage.
- Low-carbon travel incentives (Policy T5) include electric bike hire schemes, bus connectivity enhancements, and charging infrastructure for electric vehicles.

3.3.2. Parking Standards and Car Dependency Reduction (Policy TR04 & Broadclyst T3)

- New developments must be designed to reduce car dependency.
- Broadclyst's Policy T3 sets maximum parking standards rather than minimums, encouraging alternatives to car ownership.

3.3.3. Digital Infrastructure for Remote Work (Strategic Policy TR06 & Broadclyst EW1)

- High-speed broadband and 5G coverage are a planning requirement to support remote work.
- Broadclyst's Policy EW1 facilitates the creation of rural work hubs, reducing commuting and boosting local employment.

3.4. Protection and Enhancement of the Natural Environment

3.4.1. Biodiversity and Green Infrastructure (Strategic Policy PB05 & Broadclyst NE5, NE6)

- Minimum 20% Biodiversity Net Gain (BNG) is required for all developments.
- Broadclyst's Policy NE5 extends this by requiring wildlife corridors, rewilding zones, and native planting schemes.
- Protection of existing woodlands, hedgerows, and river habitats (Policies NE1 & NE4).

3.4.2. Clyst Valley Regional Park Expansion (Strategic Policy WS09)

- The Local Plan supports the expansion of the Clyst Valley Regional Park, creating new public green spaces and improving wildlife connectivity.
- Broadclyst aligns with this through the designation of Local Green Spaces (NE6), ensuring permanent protection from development.

3.4.3. Agricultural Land Protection (Strategic Policy OL10)

- High-quality Grade 1 and 2 farmland is protected from development to ensure food security.
- This aligns with Broadclyst's rural economy policies, supporting farm diversification into agroforestry and regenerative farming.

4. Chapter 4: Infrastructure Capacity and Sustainability

Introduction

The allocation of 100 dwellings in Broadclyst, as outlined in the East Devon District Council (EDDC) Regulation 19 Local Plan, raises significant concerns regarding the adequacy of local infrastructure. The National Planning Policy Framework (NPPF) (2023) emphasises the need for local planning authorities to ensure that necessary infrastructure is in place to support new development. Paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale, and quality of development, and make sufficient provision for infrastructure, including transport, education, health, and community facilities.

- 4.1. Healthcare Provision** The proposed development is likely to exert considerable pressure on local healthcare services. Broadclyst and surrounding areas currently experience strain in accessing primary healthcare services, with existing GP practices operating at or near capacity. The NPPF (paragraph 92) stipulates that planning policies and decisions should provide social, recreational, and cultural facilities and services that the community needs, including ensuring an integrated approach to considering the location of housing, economic uses, and community facilities and services. Without clear commitments to expanding healthcare facilities, the allocation of additional housing poses a risk of exacerbating waiting times and reducing accessibility for residents.
- 4.2. Education Capacity** The demand for school places in Broadclyst has steadily increased due to ongoing development. The Broadclyst Neighbourhood Plan (2023) highlights concerns regarding school capacity, particularly at Broadclyst Primary School, which is already under pressure. The NPPF (paragraph 95) asserts that local authorities should plan for sufficient school places and work proactively with education providers. However, there is currently no clear evidence that sufficient investment is planned to expand educational facilities to accommodate the additional pupils that would result from the proposed housing allocation. Without such assurances, there is a significant risk that children will need to travel outside the parish for education, placing further strain on transport infrastructure.
- 4.3. Transport and Highways Infrastructure.** Broadclyst's road network, particularly along Station Road and the B3181, already faces congestion issues. The addition of 100 dwellings is likely to increase vehicular traffic, compounding congestion and road safety concerns. The NPPF (paragraph 110) requires that developments ensure safe and suitable access for all users and that opportunities to promote sustainable transport modes are maximised.
- 4.3.1. Strategic Policy SD07 of the Regulation 19 Local Plan sets out a Masterplan-led approach for the proposed development at Broadclyst. This approach is essential to ensuring comprehensive and sustainable infrastructure planning. The policy states that development should come forward only as part of an agreed Masterplan for the allocated sites, which must incorporate necessary highway and transport improvements. Without a robust Masterplan, there is a risk of piecemeal development that does not adequately address cumulative transport impacts.

4.3.2. The Broadclyst Neighbourhood Plan identifies the need for improved pedestrian and cycling infrastructure, yet there is no indication that necessary upgrades will be delivered alongside the proposed housing. Additionally, public transport services in the area are limited, further reinforcing car dependency and increasing carbon emissions, which contradicts the sustainability objectives outlined in the NPPF (paragraph 104).

It is therefore critical that the Masterplan includes:

4.3.3. Strategic improvements to road infrastructure to mitigate increased congestion.

4.3.4. Enhanced pedestrian and cycle connectivity to align with the sustainable transport objectives of the Local Plan.

4.3.5. Expansion of public transport options to ensure residents can access essential services without reliance on private vehicles.

Failure to adhere to the Masterplan approach outlined in SD07 could result in severe infrastructure deficiencies, reducing the quality of life for both new and existing residents.

4.4. Sewerage Infrastructure and Capacity Issues

4.4.1. A significant concern for the Winter Gardens site allocation and any future strategic housing development in Broadclyst is the capacity and resilience of the existing sewerage system. There are known issues and a history related to blockages and an overall lack of capacity; Broadclyst Parish Council has been given to understand that South West Water / Pennon Water has expressed no inclination to upgrade the existing system, some of which is Victorian. Given the anticipated additional volume from 100 new homes, any new development must incorporate robust sewerage infrastructure improvements.

4.4.2. In line with NPPF paragraph 20(b), which requires strategic policies to plan for water supply and wastewater infrastructure, any site allocations must demonstrate that they will not exacerbate existing deficiencies. Additionally, NPPF paragraph 169 states that sustainable drainage systems should be incorporated to reduce flood risk and manage wastewater effectively. Therefore, all major housing developments should be required to provide site-specific wastewater and drainage strategies that ensure capacity enhancements are in place before occupation.

4.5. Chapter 4: Conclusion and Recommendations

Ensuring the delivery of genuinely affordable housing is central to Broadclyst Parish's vision for a sustainable and inclusive community. Rising house prices and increasing demand have made it difficult for many local residents—particularly young families, key workers, and those on lower incomes—to secure housing within the parish. Without intervention, there is a risk of long-standing residents being displaced, undermining the strong community identity that defines Broadclyst.

The Broadclyst Neighbourhood Plan (NP) sets out ambitious but locally focused policies to address this challenge. By requiring a higher proportion of affordable homes in new developments and prioritising local occupancy, the Broadclyst NP seeks to ensure that housing remains accessible to those with strong ties to the parish. These

homes will be integrated within well-designed, mixed-tenure developments, supporting social cohesion and enhancing Broadclyst Parish's character. The plan also promotes rural exception sites, self-build opportunities, and adaptable housing to cater to the diverse needs of the community, including older residents and those requiring accessible accommodation.

However, for development in Broadclyst to be truly sustainable, as required by the National Planning Policy Framework (NPPF), it is essential that housing delivery is infrastructure-led and community-focused. The Parish Council urges East Devon District Council (EDDC) to ensure that all housing allocations are accompanied by appropriate investment in infrastructure and public services. This includes:

- 4.5.1. Expansion of healthcare services, including additional GP capacity, to accommodate the growing population.
- 4.5.2. Investment in local schools to ensure sufficient capacity for new residents.
- 4.5.3. Enhancement of road infrastructure and sustainable transport options, including improved cycle routes and public transport connectivity, in line with the Masterplan approach set out in Policy SD07.
- 4.5.4. Adequate wastewater and sewerage provision, particularly for developments such as Winter Gardens, to prevent further strain on an already overburdened system.

Furthermore, policies should fully integrate NPPF guidance to ensure sustainable, well-balanced growth. The Devon County Council Local Cycling and Walking Infrastructure Plan (LCWIP) should be embedded into all new housing allocations to promote sustainable travel options from the outset.

By aligning with the broader East Devon Local Plan while reinforcing local priorities, Broadclyst Parish is committed to delivering high-quality, affordable housing that supports its long-term sustainability. Without these infrastructure commitments, the proposed allocation of 100 dwellings risks placing an unsustainable burden on local services, contradicting the principles of sustainable development set out in national policy. Through proactive planning and ongoing community engagement, these policies aim to create a future where housing remains accessible, well-supported, and environmentally sustainable, ensuring that Broadclyst Parish continues to thrive as a place where people of all backgrounds can find a secure and affordable home.

5. Chapter 5: Gypsy and Traveller provision

Introduction

This chapter addresses the allocation of a Gypsy and Traveller site at Langaton Lane within the East Devon Local Plan. While it is imperative that appropriate accommodation is provided for the Gypsy and Traveller community, the selection of this site presents significant concerns regarding its suitability. This response evaluates the proposal against national planning policy, equalities legislation, and best practice for Gypsy and Traveller site allocations. The numbers (e.g. points 10d, 13g, etc.) relate to the Government’s policy paper ‘Planning policy for traveller sites’

5.1. Planning Policy and Legal Framework The proposed allocation must be assessed in accordance with:

- The National Planning Policy Framework (NPPF);
- The Planning Policy for Traveller Sites (PPTS) (Updated December 2024);
- The Equality Act 2010;
- The Human Rights Act 1998;
- The East Devon Local Plan 2020-2042;
- The Broadclyst Neighbourhood Plan.

5.2. The Planning Policy for Traveller Sites (2024) requires local planning authorities to ensure that sites are sustainable, with access to education, healthcare, and other essential services. It also mandates that sites should not be located in areas subject to high levels of environmental harm, including excessive noise and pollution (PPTS, 2024, Policy B).

5.3. Site-Specific Concerns

5.3.1. **Noise Pollution.** The Langaton Lane site is in close proximity to both the M5 motorway and the Exeter to London Waterloo railway line, exposing it to severe noise pollution. The 2019 EDDC Planning Officer’s report for an adjacent development (19/1950/MFUL) deemed this area unsuitable for standard residential development due to high noise levels. While mitigation measures such as triple glazing were proposed for permanent housing, these are not feasible for caravans or mobile homes, rendering the site unsuitable for Gypsy and Traveller accommodation. This aligns with material planning considerations for The Old Piggery (Point 13e), which highlights the severe noise impact of the location.

5.3.2. **Accessibility and Infrastructure.** Langaton Lane is a narrow, rural road with no through access and lacks adequate infrastructure to support further development. While the site is near major transport links, direct accessibility remains problematic. This contradicts the requirement under the PPTS (Policy B, 2024) for sites to be in sustainable locations with safe access to essential services.

Furthermore, Langaton Lane is a key pedestrian route and a no-through road, raising concerns about highway safety and accessibility (Point 13h). The sole access to the site is via a single-track lane that is prone to regular flooding, further exacerbating concerns about site viability. The road also includes a sharp turn, which may present difficulties for long vehicles, including those typically used by

the Gypsy and Traveller community. These factors significantly undermine the practicality and safety of the proposed allocation.

- 5.3.3. **Emergency access.** The site is located just south of the point where Langaton Lane is 'stopped up,' making it a no-through road. This raises additional concerns about emergency service access. The restricted access route, combined with the narrow lane and its flooding issues, could delay or prevent emergency vehicles from reaching the site in a timely manner. Ensuring safe and reliable emergency access is a fundamental requirement for any residential development, and this location fails to meet that standard.
- 5.3.4. **Flood Risk.** A significant portion of the site is on land susceptible to flooding. The National Planning Policy Framework (2023) states that new development should be directed away from flood-prone areas unless there are overriding sustainability benefits, which do not appear to exist in this case. The Old Piggery site assessment confirms that the site is located within Flood Zone 3, which may worsen with climate change, making it highly unsuitable for residential development (Points 10d, 13g).
- 5.3.5. **Strain on Local Services.** The proposed site lacks sufficient access to essential public services, including school places and healthcare provision. The Old Piggery site assessment notes that the availability of infrastructure and public services is a key material planning consideration under the NPPF and PPTS (Point 4j). The existing pressure on healthcare services, including doctors, dentists, and pharmacies, would be exacerbated by additional residential development on this site.
- 5.3.6. **Environmental and Heritage Concerns.** The site is located near the Country Park, an area designated for biodiversity and green infrastructure. The site assessment (Points 4k, 10e, 13d) highlights the potential environmental damage, loss of green space, and threats to local wildlife. The PPTS (Policy B, 2024) requires that Gypsy and Traveller sites be located in areas that do not harm biodiversity or the environment, making this allocation problematic.

5.4. Equality and Legal Considerations Under the Equality Act 2010. Gypsies and Travellers are recognised as a protected ethnic group. Allocating a site that is unsuitable for residential use due to environmental factors could be seen as discriminatory if alternative, more suitable sites exist. The Human Rights Act 1998 further protects rights to private and family life, which includes the right to a safe and habitable living environment.

The Planning Policy for Traveller Sites (PPTS, 2024) emphasises that local authorities must ensure fairness in site selection, ensuring that Gypsy and Traveller communities are not subjected to substandard living conditions compared to the settled population. The Old Piggery site assessment (Point 26) further supports this by noting that government policy states that Traveller site development should be strictly limited in open countryside, reinforcing the unsuitability of this allocation.

5.5. Chapter 5 Conclusion and Recommendations Given the severe environmental constraints, accessibility issues, and potential legal challenges, the Langaton Lane site

is unsuitable for Gypsy and Traveller accommodation. Instead, East Devon District Council should:

- 5.5.1. Reassess potential alternative sites that meet sustainability criteria.
- 5.5.2. Conduct a robust Equalities Impact Assessment (EqIA) to ensure compliance with the Equality Act 2010.
- 5.5.3. Engage in meaningful consultation with the Gypsy and Traveller community to identify more appropriate locations.

The Council must ensure that site allocation decisions are driven by sustainability, fairness, and legal compliance rather than expediency. A reconsideration of this allocation is essential to uphold both planning policy and the rights of the Gypsy and Traveller community.

6. Chapter 6: Clyst Valley Country Park

Introduction

The Clyst Valley Country Park (CVRP) is already afforded protection under Strategic Policy WS09 in the draft East Devon Local Plan, which states that development proposals within and adjacent to the CVRP must integrate green infrastructure and contribute to the park's objectives. Any schemes that do not support these objectives, or which frustrate their implementation, will be refused planning permission.

However, the policy could be strengthened in the following ways to provide more robust protection against inappropriate development:

6.1. Explicit Prohibition of Development

- Currently, WS09 requires development to contribute positively to the CVRP's objectives but does not impose an outright prohibition on certain types of development.
- A clearer presumption against major built development (except essential park-related infrastructure) should be introduced.

6.2. Stronger Landscape and Ecological Protection

- The policy could explicitly state that any development within the CVRP must demonstrate no net loss of biodiversity and comply with the Nature Recovery Network objectives.
- A requirement to deliver a Biodiversity Net Gain (BNG) of at least 20%, exceeding national minimums, would further deter speculative development.

6.3. Additional Planning Constraints

- The CVRP policy could mirror protections given to Areas of Outstanding Natural Beauty (AONBs), requiring a stricter planning test for development.
- Introduce a Strategic Visual Impact Assessment requirement for any new proposals to ensure landscape character is preserved.

6.4. Expansion of the Green Wedge Concept

- Linking the CVRP protections with Strategic Policy OL05: Green Wedges would prevent coalescence between settlements and further limit development pressures.

6.5. Formal Designation as a Protected Landscape

- Lobbying for the CVRP to be designated as a Local Green Space under the National Planning Policy Framework (NPPF) would provide statutory protection similar to Green Belt land.

6.6. Stronger Flood and Water Protection Measures

- The policy should require developments to:
 - Avoid areas at risk of flooding within the CVRP.
 - Improve natural flood defences and soil health.
 - Contribute to natural flood management rather than rely on built infrastructure.

6.7. Align with the Broadclyst Neighbourhood Plan

- The Broadclyst Neighbourhood Plan supports the CVRP by ensuring development in the area is low-impact and environmentally sensitive.
- Strengthening the local plan to explicitly defer to more restrictive neighbourhood plan policies where applicable would add an additional safeguard.

6.8. Chapter Six Conclusion

While the draft Local Plan acknowledges the significance of the Clyst Valley Country Park, explicit prohibitions, enhanced biodiversity requirements, and formal landscape protections would provide stronger assurances against inappropriate development. These measures would ensure the CVRP continues to be a vital environmental and recreational asset for the community.

7. Conclusion

Broadclyst Parish Council supports a Local Plan that fosters well-planned, sustainable development while protecting the unique rural character, heritage, and environmental assets of the parish. This representation highlights the need for proportional, infrastructure-led growth that aligns with the principles set out in the National Planning Policy Framework (NPPF) and the Broadclyst Neighbourhood Plan.

We strongly advocate for development policies that ensure infrastructure is delivered alongside housing, rather than in reaction to it. This includes adequate transport networks, education and healthcare facilities, and green spaces that enhance community well-being. Furthermore, affordability must remain a cornerstone of housing policy, with homes priced in accordance with local income levels to support community retention and social cohesion.

The proposed new community in the West End must be subject to robust scrutiny, with clear commitments to infrastructure, sustainability, and local engagement in its planning and delivery. Lessons learned from past large-scale developments, such as Cranbrook, should inform the design and governance of new settlements to prevent repeating previous shortcomings.

Broadclyst Parish Council urges East Devon District Council (EDDC) to ensure that development is truly sustainable—not only in environmental terms but also in its long-term social and economic viability. We call for stronger commitments to active travel, biodiversity protection, and high-quality design standards that reflect the distinctiveness of Broadclyst Parish.

Finally, meaningful dialogue between EDDC and Broadclyst Parish Council is essential to ensuring that local concerns are genuinely addressed. We reiterate the need for collaborative working to refine housing allocations, infrastructure delivery, and policy implementation, ensuring that the voices of local residents are at the heart of decision-making.

Broadclyst Parish Council remains committed to shaping a Local Plan that balances growth with sustainability, delivering a future where our parish continues to thrive while preserving the qualities that make it a special place to live and work.

Yours Faithfully,

AMS Hurren

Mrs Angie M Hurren BEM
BA(Hons), Fellow SLCC
Broadclyst Parish Council CEO and Responsible Finance Officer
24.03.2025