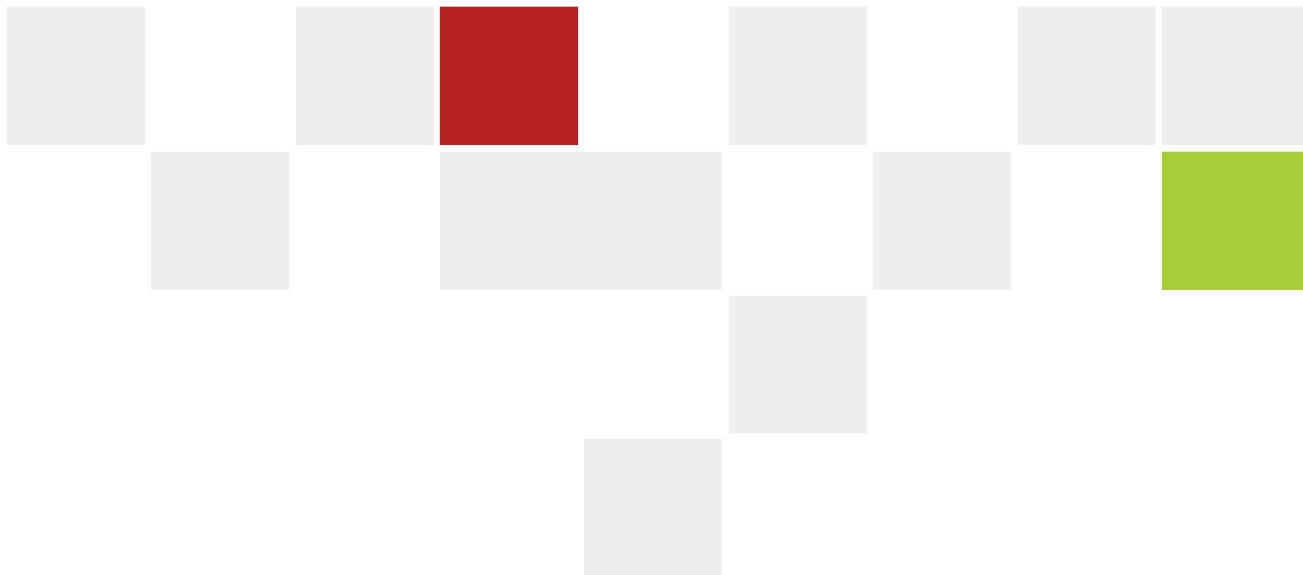


# Land at Addlepool Farm

EDDC Regulation 19 Consultation: Representations



**Boyer**

Prepared on behalf of Vistry Group | March 25

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**REPORT CONTROL**

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## **APPENDICES**

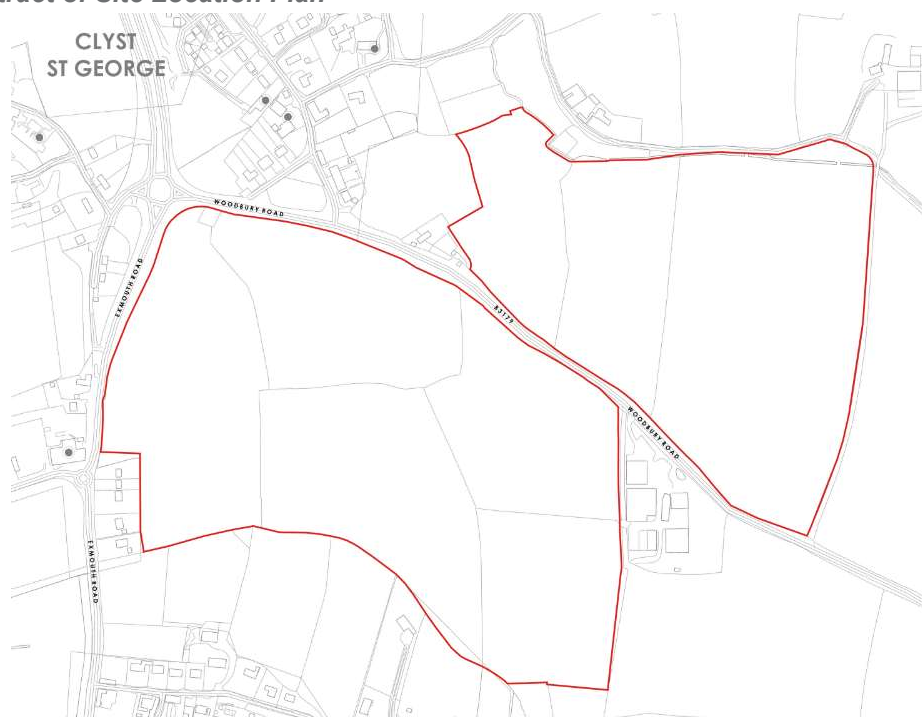
**Appendix 1. Site Location Plan**

**Appendix 2. Vision Document**

## 1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Vistry Group, in response to the East Devon District Council (EDDC) Local Plan (Regulation 19) Consultation Document (hereafter referred to as the “Draft LP”).
- 1.2 Representations for Addlepool Farm (‘the Site’) have previously been submitted as part of the Regulation 18 Consultation undertaken in November 2022, and the second Regulation 18 Consultation in June 2024, on behalf of Vistry Group.
- 1.3 The Council considered the Site to be a suitable and deliverable development site, as part of its HELAA (2022) (re: HELAA Ref: CLGE\_37). It was later identified as part of the new settlement ‘Option 3’. Whilst ‘Option 3 was assessed by EDDC’s Regulation 19 Sustainability Appraisal (SA), it is disappointing that the Site has not been assessed individually, despite Vistry Group promoting it as such.
- 1.4 Addlepool Farm stands out for its high sustainability scoring, as a suitable site to accommodate development. By not assessing the Site individually within the SA, the Plan fails to adhere to national policy by not fully considering the sustainability credentials of all reasonable alternative locations. Without this, the Plan’s spatial strategy fails to address the most sustainable patterns of development and is therefore not justified and unsound.
- 1.5 The Site is located to the south-east of Exeter, on the outskirts of Clyst St George. The Site, is formed of two parcels of land, located north and south of Woodbury Road, and extends to approximately 37.5 ha (92.67 acres). The Site is sustainably located and capable of significantly enhancing the council’s housing land supply, with a capacity of up to 700 homes.

**Figure 1.1 Extract of Site Location Plan**



### **NPPF Transitional Arrangements**

- 1.6 EDDC anticipate that the draft LP will be examined under the previous NPPF (2023) in line with the Government's transitional arrangements. This entails starting Regulation 19 consultation before 12<sup>th</sup> March 2025 and ensuring that the Plan's housing requirement meets at least 80% of the Local Housing Need.
- 1.7 While the Council has met this basic requirement, we have concerns regarding the adequacy of the evidence base justifying the Plan. Several key evidence base documents are still in preparation, including: CCF-001 - Water Cycle Study, CCF-002 Strategic Flood Risk Assessment Surface Water Zone, CCF-005 - Coastal Change Topic Paper, HCO-004- Playing Pitch Strategy, HCO-005 - Open Space Strategy, HCO-006 - Sports Facilities Study, HRD-004 - East Devon Heritage Strategy (2024-2042).
- 1.8 Furthermore, we are aware that EDDC are proposing a second Regulation 19 Consultation (identified as Phase II), which is scheduled to occur after the Transitional Arrangements 'deadline' of 12<sup>th</sup> March 2025. This second Regulation 19 Consultation aims to address the new community and "fill policy gaps" where necessary.
- 1.9 This implies that the current Regulation 19 Consultation is incomplete, both due to the presence of "policy gaps" and the absence of necessary evidence base documents. Consequently, we question whether the Council will have a Plan ready to proceed to examination before 12<sup>th</sup> June 2026 in accordance with paragraph 237 of the NPPF (2024).
- 1.10 Notwithstanding our concerns, we have prepared this representation on the basis of the 2023 NPPF.

### **Test of Soundness**

- 1.11 These representations respond to the relevant draft Local Plan policies, with particular consideration given to the NPPF's tests of soundness:
  - a. Positively Prepared;
  - b. Justified;
  - c. Effective; and
  - d. Consistent with National Policy

## 2. DRAFT LOCAL PLAN POLICIES

2.1 This Chapter discusses the Strategic Policies of the Draft LP in chronological order.

### Chapter 3. The Spatial Strategy

#### Strategic Policy SP01: Spatial Strategy

2.2 Vistry **support** the principle of the draft spatial strategy detailed within Policy SP01, which seeks to direct development towards the most sustainable locations in East Devon.

2.3 The most sustainable locations have been identified as the West End of the District, followed by the Principal Centre of Exmouth, and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton and Sidmouth. Vistry **support** the proposed settlement hierarchy, and its distribution of development to the most sustainable locations.

2.4 It is noted that settlements not listed within the Spatial Strategy are defined as in 'open countryside' for the purposes of the Local Plan. It should be recognised that development can contribute to increasing the sustainability of settlements through the provision of additional services and facilities. New development can also contribute to the long-term viability of settlements through the indirect spending of future occupiers, and the provision of future residents to ensure the long-term vitality of communities.

2.5 For the reasons described above, Vistry **support** Strategic Policy SP01 and its Spatial Strategy, which aims to meet the needs of the West End, Principal Centres, Main Centres, Local Centres, Service Villages and the wider open countryside as a whole.

#### Strategic Policy SP02: Levels of Future Housing Development

2.6 While Vistry support the principles set out in Plan's spatial strategy it is considered that for the Plan to be effective:

- The stepped trajectory should be uplifted within the first half of the Draft LP period to avoid a significant shortfall within the Draft LP up until 2031/32.
- Additional site allocations should be included within the Draft LP in addition to those already allocated to meet the delivery of at least 20,909 homes within the plan period of 2020 – 2042, which should include land at Addlepool Farm.
- The Council should provide compelling evidence to justify the reliance on housing delivery within the new settlement.

2.7 Strategic Policy SP02 proposes that housing provision be made for at least 20,909 dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042.

2.8 While we welcome the uplift in housing delivery in line with the standard methodology Local Housing Need (LHN) figure - to ensure the Plan is **positively prepared**, the full housing needs of East Devon should be met. At present the Plan only meets 80% of the communities housing needs.

- 2.9 Paragraph 3.12 of the Draft LP states that the proposed “*new community provision of new homes will come forward under a stepped trajectory that will provide an annual average of 850 dwellings per year from 2020/21 to 2031/32 and 1,070 per year from 2032/33 to plan end at 2023/24.*”
- 2.10 Whilst the principle of Policy SP02 is supported, Vistry **strongly object** to the proposed stepped trajectory approach utilised within the Draft LP due to the following reasons.
1. We consider that the use of a stepped trajectory approach does not represent **effective** plan-making, as it places a significant level of reliance on EDDC’s cumulative housing supply shortfall from 2029 onwards.
  2. It is noted that the delivery of Cranbrook has historically been associated with supply issues. The over reliance on housing delivery from a single new settlement is therefore not **justified** as the Council has not provided proportionate evidence to justify this approach.
- 2.11 An assessment of the cumulative shortfall created by the proposed stepped housing trajectory approach has been prepared by Boyer within the table below.

**Table 2.1 Boyer Assessment of the proposed Draft LP stepped housing trajectory.**

Year	Housing Requirement	Completed	Estimated Delivery	Shortfall/ Surplus	Cumulative requirement	Cumulative delivery	Cumulative Shortfall
2020/21	950	867*	-	-83	950	867	-83
2021/22	950	1,039*	-	+89	1900	1906	+6
2022/23	950	998*	-	+48	2850	2904	+54
2023/24	950	623*	-	-327	3800	3527	-273
2024/25	950	-	1297	+347	4750	4824	+74
2025/26	950	-	781	-169	5700	5605	-95
2026/27	950	-	660	-290	6650	6265	-385
2027/28	950	-	645	-305	7600	6910	-690
2028/29	950	-	448	-502	8550	7358	-1192
2029/30	950	-	1471	+521	9500	8829	-671

2030/31	950	-	1428	+478	10450	10257	-193
2031/32	950	-	1294	+344	11400	11551	+151
2032/33	950	-	1494	+544	12350	13045	+695
2033/34	950	-	1276	+326	13300	14321	+1,021
2034/35	950	-	1208	+258	14250	15529	+1,279
2035/36	950	-	1318	+368	15200	16847	+1,647
2036/37	950	-	1243	+293	16150	18090	+1,940
2037/38	950	-	1078	+128	17100	19168	+2,068
2038/39	950	-	1213	+263	18050	20381	+2,331
2039/40	950	-	911	-39	19000	21292	+2,292
2040/41	950	-	819	-131	19950	22111	+2,161
2041/42	950	-	646	-304	20,900	22757	+1,857

\* These figures have been derived from EDDC's HMU (Published in November 2024), which notes that the figures had been updated to reflect the loss and gain of units from the proposed care home

- 2.12 The table above illustrates that with use of the stepped trajectory, EDDC will have a 6-year period from 2025/26 to 2030/31 where it is anticipated that there is a housing shortfall. This shortfall is particularly significant in the years 2028/29 totalling 1,192 dwellings. Vistry consider that the shortfall and failure to meet the adopted housing requirement of 20,900 until 2031/32 is neither **positively prepared** nor **effective**.
- 2.13 While it is acknowledged that other local authorities have adopted a similar stepped approach, EDDC's circumstances differ. Unlike other authorities with stepped housing trajectories, East Devon doesn't have Green Belt constraints and is able to accommodate development through plan making.
- 2.14 It is considered that the draft LP must uplift its housing supply, particularly within the first half of the draft LP period.

#### *Affordable Ratio in EDDC*

- 2.15 The December 2024 draft Housing Strategy published by EDDC confirmed that Devon Home Choice had almost 6,000 people on the waiting list for social housing, and 3,000 with a

housing need at the time of publication. In addition, the Devon Housing Commission report has provided evidence to demonstrate that East Devon is amid a housing crisis.

- 2.16 It must be acknowledged that EDDC has faced significant issues with affordability, with recent ONS data published in 2024 confirming the affordability ratio for EDDC was 9.98. This was higher than the South West (at 9.27) and considerably higher than England (8.26).
- 2.17 This clearly demonstrates that the use of a stepped trajectory within the Draft LP is not **justified**, will exasperate an existing affordability issue within EDDC, and will not effectively address the existing housing needs.

#### *Over-supply / Headroom*

- 2.18 We have concerns regarding the Plan's housing supply contingency, which amounts to only 9.8%. This is considered too low to ensure the Plan remains effective in delivering its housing requirement before 2042. This is particularly pertinent noting the Plan's reliance on a new settlement to deliver approximately 15% of the proposed housing requirement.
- 2.19 We consider that the Plan should provide at least a 20% headroom to ensure the consistent delivery of homes throughout the plan period. This should include the allocation of land at Addlepool Farm.

#### *Over Reliance on the New Settlement's Housing Delivery*

- 2.20 It is understood that EDDC's justification for the stepped trajectory is due to a reliance on the delivery of a new settlement (draft LP policy WS01), which, as set out above, comprises over 15% of EDDC's housing requirement.
- 2.21 The allocation of a new town on the edge of Exeter is not disputed and it is agreed that the Western edge of East Devon is a sustainable location for development, meeting housing need close to jobs and services at Exeter.
- 2.22 Whilst we do not oppose the principle of allocating land for a new settlement within the Draft LP, we do object to the delivery assumptions that have been applied; and the over-reliance on this draft allocation to deliver housing within the second half of the plan period.
- 2.23 The new settlement is proposed to accommodate 3,300 homes over the plan period, and is reliant on the creation of an agreed, 'whole community' masterplan, with delivery of the Site to be on an agreed phased basis.
- 2.24 The draft LP proposes the delivery of 3,300 homes in the new settlement, an increase of over 1,000 homes compared to the 2,500 homes projected in the previous Regulation 18 Draft LP. However, we have not seen robust evidence published since the Regulation 18 Draft LP consultation to justify this uplift in housing delivery assumptions.
- 2.25 At present, we consider that the assumption that housing delivery will commence within the new settlement from 2030 is not justified and the housing trajectory (which informs SP02) is **unsound**.

- 2.26 Evidence demonstrates that developments of significant scale (including new towns) are characterised by the protracted delivery times of new homes.
- 2.27 A report by Colin Buchanan (2005) noted that new towns are likely to need to be delivered via a Development Plan Document (DPD), which would secure a framework within which planning applications should be prepared. Indeed, this would align with the Strategic Policy WS01 policy text, which states that a ‘whole community’ masterplan must be prepared. Such a document would need to be adopted post-Draft LP adoption, and it is noted that the Draft LP is not due to be adopted until 2026.
- 2.28 Indeed, the risks of bringing forward the development of a new town in the absence of such a document is already apparent in East Devon, noting the infrastructure delivery issues associated with Cranbrook.
- 2.29 To ensure that a future DPD is effective, it is not considered that any subsequent planning applications could be determined until the DPD is formally adopted, to ensure that any development aligns with the relevant DPD.
- 2.30 Several factors also influence the delivery of strategic sites, including site conditions, local market, joint working (including partnership between local authorities).
- 2.31 The Buchanan Report also sets out the likely timescales between first application submission and first build year. The report states:
- “...given the need for pre-application discussions and the need to support strategic applications with rigorous and comprehensive information and the complexity of securing on-site and off-site improvements, including provision of infrastructure (community, social, utilities and transport) it is difficult to envisage that the time between an allocation in a local development framework and first year of build reducing.”*
- 2.32 For site capacities of 3,000 dwellings or greater, this lag time is approximately 5.5 years.
- 2.33 A more recent report, produced by Nathaniel Lichfield and Partners analysed the deliverability of strategic sites. The report identified that the planning approval period increases in step with the size of the development. The report confirmed that schemes of 2,000 dwellings or more averaged approximately 6.9 years from validation of application to the construction of first house.
- 2.34 The Draft LP adoption, preparation and adoption of a DPD and submission and approval of an Outline Application and subsequent Reserved Matters and Discharge of Conditions application demonstrate that it is highly unlikely that the new town could deliver 3,300 dwellings within the Draft LP period. Previous evidence would suggest that delivery is unlikely to commence until the latter end of 2030s at the earliest.
- 2.35 To ensure the consistent delivery of dwellings, the Draft LP should allocate additional sites, to provide a greater contingency of supply, should there be any delays with delivery of the new town.

*Historic Delivery Issues Relating to Cranbrook*

- 2.36 East Devon have previously over-relied on housing delivery within new settlements, a most notable example of this is housing delivery within Cranbrook.
- 2.37 The adopted Local Plan anticipated that a significant quantum of development would be delivered within the West End Strategic Allocations across the adopted Plan period, particularly within Cranbrook and the identified Cranbrook Expansion Areas. However, housing delivery within the expansion areas has not progressed at the rate envisaged, which is highlighted within the table below. This illustrates the actual housing delivery rates for the West End when compared against the far more ambitious housing trajectory that was anticipated by the Council at the time Local Plan was adopted.

**Table 2.2 Projected Delivery and Completion rates for the West End Strategic Allocations**

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
West End Projected Delivery	486	531	515	584	725	774	746	772	674	649	611
West End Completions	486	531	403	335	326	392	560	455	568	518	358
Surplus/ Deficit	0	0	-112	-249	-399	-382	-186	-317	-106	-131	-253

- 2.38 It clear that the Plan must take a more pragmatic and realistic approach to the housing delivery assumptions relied upon for new settlement to ensure that the Plan does not repeat the same delivery issues and is effective and sound.
- 2.39 To meet the test of soundness and ensure the Plan is **effective** and **positively prepared** additional housing allocations must be included alongside the new settlement, which would ensure the consistent delivery of homes throughout the Draft LP period. This should include the allocation of land at Addlepool Farm.
- 2.40 Land at Addlepool Farm offers an opportunity to deliver a high quality, self-contained, and sustainable new village, creating homes and a neighbourhood which complements the existing character and needs of the local area. The proposals will include approximately 700 homes (including both market and affordable homes), local centre, land for a 2-form entry primary school (2.4ha), allotments, sports pitches and public open space.

- 2.41 One of the key benefits to the scheme relates to its delivery. The Site lies entirely within a single ownership and is within the control of Vistry, the largest housebuilder in the UK, who can deliver the scheme in the short to medium term.
- 2.42 Vistry have the experience and resource to deliver this site in full and will not be reliant on other parties to bring forward the development. This will ensure consistent delivery of homes throughout the Draft LP period.
- 2.43 Vistry would welcome further discussion with the Council regarding the allocation of the Addlepool Farm site, which would help ensure the Plan can be found sound.

#### **Strategic Policy SP03: Housing Requirement by Designated Neighbourhood Area**

- 2.44 Policy SP03 does not align with National Policy and the Government's overarching objective of significantly boosting the supply of homes under paragraph 60 of the NPPF (2023) and is therefore **not sound**.
- 2.45 Greater emphasis must be placed on the fact that housing requirements for Neighbourhood Development Plan areas are considered as a minimum target and should therefore not prevent additional growth from coming forward.
- 2.46 Whilst Vistry therefore support the principle of Policy SP03, we are concerned and **object** to the current policy wording and consider that minor changes to the text are needed to ensure that the policy is **consistent with National Policy**.

#### **Strategic Policy SP05: Development Inside Settlement Boundaries**

- 2.47 While we support the policy in principle, we are concerned that the proposed wording restricts and discourages Neighbourhood Plans from allocating sites outside of settlement boundaries.
- 2.48 Housing numbers within the Council's strategic policies and housing distribution should not represent a ceiling to growth. Should local unmet need for additional housing be identified (beyond that identified within the Draft LP), the Council should encourage growth within Neighbourhood Development Plan areas to support the delivery of homes within East Devon. Neighbourhood Plans are required to be in general conformity with the strategic policies of the development plan in force (in order to meet the basic conditions)<sup>1</sup>.
- 2.49 Should updated evidence be prepared in support of a future Neighbourhood Plan that suggests that there is a local unmet need for additional housing (beyond that identified within the adopted LP), the Council should not prevent additional sites from being allocated within the Neighbourhood Plan if the additional growth accords with the overarching spatial strategy for EDDC.

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<sup>1</sup> Neighbourhood Planning PPG Paragraph: 009 Reference ID: 41-009-20190509

- 2.50 As currently worded, therefore, it is considered that this Strategic Policy is **not sound** as it is not consistent with National Policy and the Government's overarching objective of significantly boosting the supply of homes under paragraph 60 of the NPPF (2023).

#### **Strategic Policy SP06: Development Beyond Settlement Boundaries**

- 2.51 Strategic Policy SP06 states:

*"In locations outside of the defined settlement boundaries development will not be permitted unless it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development".*

- 2.52 Vistry consider that minor amends are required for this policy to be sound. There is an element of inconsistency with Strategic Policy SP05, which appears to discourage Neighbourhood Plans from allocating sites outside of the Draft LP settlement boundaries. It should be acknowledged that Neighbourhood Plans can make alterations to the settlement boundaries to allow for additional housing growth where this is justified and accords with the Council's overarching spatial strategy, therefore meeting the NDP Basic Conditions Tests.

#### **Strategic Policy SP07: Delivery of Infrastructure**

- 2.53 Vistry **support** the principle of Strategic Policy SP07 which relates to the delivery of supporting infrastructure with new development. We understand and acknowledge the need for infrastructure on both a strategic and local level to support growth within East Devon, and that new development is a key aspect of the delivery of infrastructure.
- 2.54 We, however, disagree with the policy text that references the need for appropriate development to support the 'wider community'. We object to the inclusion of this text within the draft policy. Infrastructure to support proposed development must meet the tests set out within Regulation 122 (as amended by the 2011 and 2019 Regulations) (necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development). At present, the draft LP policy indicates that the proposed development should offer infrastructure that would improve the infrastructure needs of the wider community. As set out above, infrastructure must be suitable for the development to be acceptable in planning terms, there is no requirement for development to support the needs of the wider community. This element of the draft LP policy should be removed accordingly.

### **Chapter 4. Development at the West End**

#### **Strategic Policy WS01: Development of a Second New Community East of Exeter**

- 2.55 Vistry do not dispute the allocation of a further new town on the edge of Exeter, and it is agreed that the Western edge of East Devon is a sustainable location for development, meeting housing need close to jobs and services at Exeter.
- 2.56 Whilst we do not contend with the strategy to include a further new town within the Draft LP, we have significant concerns as to whether such a development can deliver 3,300 dwellings

within the Draft LP period and commence housing delivery by 2030 (as proposed within the Council's housing trajectory).

- 2.57 It is noted that the Policy WS01 states that the new community "*will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis*". The policy proceeds to reference the requirement for a "*allocation-wide Masterplan*", which will set out the affordable housing provision across the entire allocation and housing tenure and densities. By the end of the Draft Plan period, the Site will need to include a 5-hectare completed and operational town centre.
- 2.58 However, the Draft LP fails to confirm how the developments shall be delivered in a phased and co-ordinated manner. It is our assumption that this will be secured via a Development Plan Document (DPD).
- 2.59 A DPD cannot be adopted in advance of the Draft LP to which it relates and arguably, for the DPD to be effective, planning applications relating to the new town should not be submitted in advance of the DPD being adopted.
- 2.60 Even after the adoption of a DPD, as set out within our response to Strategic Policy SP02, there are significant lag times associated with housing delivery in large allocations.
- 2.61 It is not considered realistic that the new settlement could deliver housing by 2030.
- 2.62 For this policy to be effective and, therefore sound, the quantum of development proposed through the new town in this Draft LP should be reduced to reflect a more justified delivery figure; and additional housing sites allocated across East Devon to ensure the housing requirement is fulfilled and the consistent delivery of homes throughout the Draft LP period.
- 2.63 Land at Addlepool Farm should be included as an allocation. The proposed scheme aligns with the Council's overarching principles of delivering development in accordance with the 20-minute neighbourhood concept, whereby key facilities and services are within a 20-minute distance using public transport, walking or cycling.

#### **Strategic Policy WS09: Clyst Valley Regional Park**

- 2.64 We support draft policy WS09 and EDDC's identification of Clyst Valley Regional Park.
- 2.65 Land at Addlepool Farm will positively contribute to the achievement of the objectives of the CVRP and enhance linkages with the park. The delivery of Addlepool Farm will increase the number of communities that will benefit from the park, offering greater connectivity and access to a wider audience along the eastern edge of Exeter.
- 2.66 Vistry Group consider Land at Addlepool Farm to provide the opportunity for a sustainable new community that will strongly support the expansion of the CVRP. Development at Addlepool Farm would enable the active and healthy places criteria of the CVRP to reach its maximum potential through the Site's proximity to the expansion boundary. Addlepool Village would enhance green links with Clyst St George, providing existing and future residents with improved access to green space and public open space. Given the Site's location along the

length of the proposed Clyst Valley Trail, the Walking and Cycling infrastructure of the Clyst St George would also be improved, enhancing accessibility into the CVRP and along Exmouth Road and Woodbury Road through the provision of sustainable movement

#### **Strategic Policy WS10: Development Next to the M5 and North of Topsham**

- 2.67 Vistry object to the allocation identified as “development next to the M5 and north of Topsham”, set out within Strategic Policy WS10. The policy is **not justified** and is unsound.
- 2.68 Within EDDC’s Regulation 18 Additional Consultation, the Site was identified as being located within a Green Wedge. Vistry responded to that consultation confirming that they had significant concerns regarding the impact of the draft allocation on the purpose and functionality of the Green Wedge designation within which it was then located. It is noted that the proposals map has since inset the Site within Green Wedge designation. EDDC revised the Green Wedge designation to exclude areas covered by Strategic Policy WS10, effectively adjusting the boundaries to leave out site proposed for housing. This adjustment compromises the integrity of the original Green Wedge identification process. The inclusion of a site within a Green Wedge signifies that its development would lead to settlement coalescence. Consequently, such sites should not be deemed suitable for development and should have been assessed appropriately in the Council’s HELAA site suitability assessment.
- 2.69 This development of this site would introduce inappropriate built form to the area, as it is situated between Topsham and Clyst St Mary, not directly adjoining either settlement. This would result in sporadic, isolated development that contributes to settlements coalescence. Although separated by the M5, the allocation would appear as an extension to the southeast of Exeter and the nearby settlement of Newcourt.
- 2.70 It is noted that the Site extends across multiple land ownerships and the policy requires a masterplan prior to enabling any specific parcels of land to come forward for development. This masterplan will also require cross-boundary working with Exeter City Council and will require the development to consider the infrastructure needs across both authority areas.
- 2.71 The Site’s HELAA (2022) assessment also notes that the Site is located within Grade 1 agricultural land, and therefore the allocation does not comply with draft LP Policy OL10.
- 2.72 Vistry consider there to be suitable alternative sites outside of the existing Green Wedge and within areas of lower agricultural land quality, located on strategic network routes that require less infrastructure improvements that can deliver housing at a similar scale to Land North of Topsham without compromising the purpose and function of other policies, including Land at Addlepool Farm.
- 2.73 Addlepool Farm is owned by a single landowner, and is within the control of Vistry, a national housebuilder, who have the expertise and reputation to deliver a sustainable scheme that can make a meaningful contribution to EDDC’s housing land supply in the short to medium term. Unlike this draft allocation at north Topsham, Addlepool Farm is not located within a Green Wedge and its development would not compromise the coalescence of settlements.

## Chapter 6. Mitigating Climate Change

### Strategic Policy CC01: Climate Emergency

- 2.74 Strategic Policy CC01 requires that developments must support East Devon's target to become carbon neutral by 2040, through:
- Supporting movement to net zero development; and
  - Maximising opportunities for delivery of low carbon and renewable energy, district heat networks, and energy storage facilities.
- 2.75 The policy is acknowledged; however, it should be recognised that the implementation of the Future Homes Standard (FHS) will largely influence the sustainability requirements that must be adopted for housebuilding across England. The implementation of the FHS will support East Devon's target to become carbon neutral by 2040, and therefore, any policy requirement which goes beyond the requirements of building regulations (now or in the future) must be justified and supported by relevant viability assumptions and assessment.

### Strategic Policy CC02: Net-Zero Carbon Development

- 2.76 Vistry continue to support the Council's declaration of a climate emergency and acknowledge that there is a need within the Draft LP for a policy which requires new developments to respond to, and mitigate, the effects of climate change.
- 2.77 However, Vistry have significant concerns with regards to the requirements for 'all new homes' and 'all development' as detailed within Strategic Policy CC02 and question if the level of detail required is a **justified** request based on a robust evidence base.
- 2.78 Policy requirements should be based upon existing legislation such as Part L of the building regulations and the Future Homes Standard requirements. Whilst it is acknowledged that meeting energy efficiency requirements as set out within the building regulation Future Homes Standard 2025 or successor standards will provide measures to achieve the overarching goal of net-zero carbon development, the proposed policy should not be a duplicate to Building Regulations; and viability must be considered and sufficient flexibility built into the policy.

### Strategic Policy CC05: Heat Networks

- 2.79 We **object** to this policy which is not **justified** or supported by sufficient robust evidence.
- 2.80 Strategic Policy CC05 proposes that all major developments within 1km of an existing heat network be connected or provide a new heat network for proposals over 1,200 homes where no heat network currently exists. The proposals at Addlepool Farm fall below the threshold of 1,200 dwellings and therefore it is not anticipated that a heat network would be required to be delivered as part of this site.
- 2.81 Notwithstanding this, further work is also needed to demonstrate that a heat network can be secured at an affordable price that would benefit from the same safeguarding as a domestic

supply. As present, the ability to access heat networks is outside of the control of the developer/landowner and this Draft LP policy should be removed.

### **Strategic Policy CC06: Embodied Carbon**

2.82 We have two key concerns regarding this policy:

1. The assumption that applications at each stage can be supported by an embodied carbon assessment submitted via a Whole Life Carbon Cycle Assessment (WLCCA) procedure; and
2. Viability Assumptions.

2.83 These are discussed in turn below.

#### *Preparation of a Whole Life Carbon Cycle Assessment (WLCCA)*

2.84 This policy is underpinned by two pieces of evidence including CCF-018 - Whole Life Carbon Assessment for the Built Environment (2nd Ed.) and CCF-024 - RICS Whole Life Carbon Assessment for the Built Environment (1st Edition - 2017). Both documents confirm the methodology and requirements for preparing a WLCCA. The reporting table requires significant amounts of information relating to the proposed development including GIA, Facilitating Works, Substructure, Finishes, Fixtures and Fittings. Strategic Policy CC06 needs to acknowledge that such inputs will not be available at the outline stage of a project or application and would require the assessor to adopt a considerable number of assumptions. This is impractical and goes beyond the remit of an outline application which is only seeking permission for the principle of development.

#### *Viability Assumption*

2.85 It is also noted that the Draft LP Viability Assessment (Core Submission Document CSD-004), makes no allowance for this policy requirement, confirming that the need to prepare an embodied carbon assessment is considered to fall within the remit of Professional Fees. Whilst we do not disagree with this approach, particularly given the high-level nature of Local Plan Viability Assessments, we note that the Draft LP Viability Assessment has applied the assumption that Professional Fees are reduced to 6% of build costs for developments in excess of 101 dwellings. We strongly consider that this assumption is insufficient and the assumption that these fees fall to 6% of build cost on larger schemes is not justified and does not represent best practice in viability assumptions. Professional Fees for all viability assessments should range between 8-10%.

## **Chapter 7. Adapting to Climate Change**

### **Strategic Policy AR01: Flooding**

2.86 We support the principle of a flooding-related policy, however, we consider the policy wording to lack in flexibility and is overly onerous to the development industry, without appropriate justification.

- 2.87 Criterion a) requires development proposed in a flood risk location from any source to demonstrate that there is no sequentially preferable location for development. We consider that additional clarification is required to ensure this policy aligns with the NPPF. Planning applications will be determined against their compliance with the most up to date National Guidance and PPG. In respect of sequential tests (ST), it is clear that these are only required to be undertaken in instances where build development/land rising/access or egress/internal road layout are located within areas at risk of flooding (from all sources). A ST is not required where POS is located within areas at risk of flooding. We consider that additional clarity is required to ensure this policy is not ambiguous to the decision-maker.
- 2.88 We disagree with Criterion c) requirement regarding delivering developments which result in a lower than greenfield run off rate. We have reviewed the 'Sustainable Drainage System – Guidance for Devon', which states that "for developments on greenfield sites, runoff rates post development should never exceed greenfield runoff rates for the same return period event." There is no requirement for developments to deliver a lower greenfield run off rate. Whilst we support an encouragement for developments to deliver a betterment in respect of greenfield run off rates, DCC guidance is clear that this is not a requirement, rather, existing greenfield run off rates shall not be exceeded. We propose that the policy is reworded accordingly, as currently worded it is not justified and not supported by proportionate or robust evidence.

#### **Strategic Policy AR02: Water Efficiency**

- 2.89 It is noted that the Water Cycle Study is not currently published and does not form part of the existing Draft LP Regulation 19 Consultation evidence base. Vistry therefore consider that Strategic Policy AR02 is not **justified** as there is a lack of supporting evidence that is robust, and that the policy text is not **consistent** with current Building Regulations.
- 2.90 In the absence of the relevant evidence base, Vistry suggest that an amendment to the policy text be made to ensure that reference is made to Building Regulations G2 and the water efficiency standard of 125 litres per day to ensure that the policy is not unsound. In addition, acknowledgement should be included within Policy AR02 stating that developers cannot impose water usage restrictions, and that developers can only install and encourage occupiers to adopt water efficient methods.

### **Chapter 8. Meeting Housing Needs**

#### **Strategic Policy HN01: Housing to Address Needs**

- 2.91 We **support** the principle of Strategic Policy HN01 and recognise the need for new developments and housing to address the Council's needs. In addition, Vistry continue to welcome the use of local market evidence and sales information as a method to determine appropriate housing need as this provides flexibility for the market to inform the types of dwellings that should be delivered on development sites.
- 2.92 Vistry suggest that the policy text be amended to ensure that sufficient flexibility is built into the policy with regards to the requirement for the provision of serviced plots (for self-build /

custom build) and the requirement for all new development. Vistry continue to question if this request is **justified**. It should be acknowledged that in cases where there is no demand for self-build plots, the developer should not be penalised for not delivering specialised dwellings on new development and should be driven by demand.

- 2.93 To ensure that Strategic Policy HN01 is justified in accordance with the NPPF, the policy text should therefore state that *“D. Serviced plots of land for self-build and custom housebuilding will be sought on new developments where there is an evidenced market demand”*.

### **Strategic Policy HN02: Affordable Housing**

- 2.94 Vistry **support** Strategic Policy HN02 and the approach made to affordable housing with regards to allocated sites and windfall development. It is acknowledged that this requirement will assist the Council in meeting and addressing housing need and worsening affordability gap.
- 2.95 In accordance with Strategic Policy Addlepool Village is proposed to deliver 35% affordable housing which will assist the Council in meeting their affordable housing need (which is understood to be one of the highest detailed within the proposed affordable housing requirements within Policy HN02).
- 2.96 The policy provides a breakdown of affordable housing tenures and mix, which provides no flexibility for the development industry and fails to recognise market variance. At present, the policy therefore does not accord with paragraph 86(d) of the NPPF (2023) which requires planning policies to be *“be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”*. We therefore raise concerns in respect of the proposed affordable housing mix within Policy HN02, and request that additional flexibility be provided as it should be recognised that local market information should be used to inform the appropriate tenure breakdown, beyond that set out within the District wide housing needs assessment. The proposed affordable housing mix should therefore be considered on a case-by-case basis and allow alternative mixes where necessary.
- 2.97 To be considered **effective** and **sound**, Strategic Policy HN02 should provide greater flexibility and allow developers to depart from the affordable mix set out within the tables where this is robustly evidenced. Departure from the proposed affordable housing mix should be considered acceptable when sufficient market evidence is provided, particularly if the overall percentage of proposed affordable housing meets the requirements as set out within Policy HN02. Vistry suggest that the prescribed tenure mix should therefore be used as a guidance and starting point only.

### **Strategic Policy HN03: Housing to Meet the Needs of Older People**

- 2.98 Vistry support the principle of Policy HN03 and recognise the importance of housing to meet the needs of older people, given that evidence suggests that there is a need for a greater number of units for older persons due to an aging demographic across the District. However,

we are concerned that greater emphasis must be placed on the viability of this provision as some sites may not be suitable for older persons specialist housing.

- 2.99 It is noted that the requirement for housing proposals, subject to commercial viability, *“schemes for 200 or more dwellings should include at least 10% as on-site as specialist older persons dwellings as either C3 dwellings and/or C2 equivalents”*.
- 2.100 The reduction from 20% to 10% for schemes over 200 dwellings is welcomed, however Vistry consider that the current policy wording is not **effective**, nor **justified**, as it fails to consider the specific locational needs of specialist housing (such as proximity to town centres or well-established public transport routes), which may render such dwellings typologies unsuitable for major development sites. At present therefore, the policy is not considered **sound**. The proposed policy text should be reworded to recognise that older persons units will only be required where there is up to date evidence and an evidenced market demand, subject to viability.
- 2.101 Addlepool Farm would create a new sustainable village and destination. Should there be a demand for specialised homes, in accordance with this Policy, these could be delivered as part of the future scheme.

#### **Strategic Policy HN04: Accessible and Adaptable Housing**

- 2.102 Vistry **support** the principle of Strategic Policy HN04 and acknowledges that new homes should provide quality living environments for residents both now and in the future. However, we believe that there should be more emphasis on flexibility and viability which should be factored into the proposed policy text. To be considered **justified**, the policy text should provide more detail with regards to the Site suitability and viability considerations.

#### **Strategic Policy HN05: Self-Build and Custom Build Housing**

- 2.103 Vistry support the principle of Strategic Policy HN05 however we have concerns regarding the requirement for at least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self-build plots.
- 2.104 We question whether this requirement for provision of self-build and custom build housing to be delivered on all new developments above 20 dwellings is **justified**. In such instances where there is no demand, the developer should not be penalised for not delivering specialised dwellings on new developments.
- 2.105 To ensure that the policy is justified and therefore sound, the policy text should be clarified to state that such specialised housing will be sought on new developments where there is an evidenced market demand. If there is no market demand, it should be acknowledged that units should revert back to market housing to meet local demand.

## Chapter 10. High Quality Design

### Strategic Policy DS01: Design and Local Distinctiveness

- 2.106 Vistry recognise and **support** the requirement within Strategic Policy DS01 for new development to be of a high-quality design and locally distinctive.
- 2.107 Land at Addlepool Farm offers an opportunity to deliver a high quality, self-contained, and sustainable new village, creating homes and a neighbourhood which complements the existing character and needs of the local area.
- 2.108 Addlepool Village is proposed to deliver a range of private and affordable homes supported by a variety of new community, recreational and ecological opportunities to create a self-contained, well-connected, lively and vibrant new neighbourhood. The Site is entirely within the control of Vistry who as promoters of the Site would also ultimately build and sell the new homes, providing greater certainty of delivery in the short to medium term.
- 2.109 We consider that the identification of Land at Addlepool Farm as an allocation, alongside the existing allocation of a new town, would provide the Council with greater assurance that the Plan was capable of delivering its housing requirement, particularly in the event that the new town delivery is delayed.

### Policy DS02: Housing Density and Efficient Use of Land

- 2.110 Vistry **support** Policy DS02 and agree with the need for proposals for residential development to optimise the density of the Site in a manner that conserves or enhances the character of the area and makes efficient use of land.
- 2.111 It is also noted that proposals for major residential development in heritage sensitive locations will be required to be supported by a design code agreed with or produced by the council as planning authority.
- 2.112 It is acknowledged that Clyst St George Church (Grade II) is located to the north west of the Site and there are locations within the Site which have some visibility of the church tower. The proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. Key view corridors have been retained and are proposed as green space to ensure that the intervisibility of the church tower can be preserved.

## Chapter 11. Sustainable Transport and Communications

### Strategic Policy TR01: Prioritising Walking, Wheeling, Cycling and Public Transport

- 2.113 Vistry **support** Policy TR01 and agree that walking, wheeling, cycling and public transport should be the natural first choice for short local journeys, or as part of a longer journey, and therefore should be prioritised in new development.
- 2.114 Land at Addlepool Farm is in a sustainable location and is in close proximity to sustainable modes of transport, with good connectivity to the main district and regional centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is

served via several bus services providing connections to Topsham, Woodbury, Exeter and the villages in between.

- 2.115 The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements, new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond.

### **Strategic Policy TR02: Protecting Transport Sites and Routes**

- 2.116 Vistry **support** Strategic Policy TR02 and the welcome support from the Council for the delivery of sites and routes that are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.
- 2.117 Land at Addlepool Farm does not require significant transport improvements or infrastructure to be delivered and can come forward on its own to accommodate a self-sufficient, sustainable, new village on the western edge of East Devon.

### **Policy TR03: Travel Plans, Transport Statements and Transport Assessments**

- 2.118 Vistry **support** Policy TR03 and agree with the proposed requirement for a transport statement or transport assessment, and subsequent travel plan if a development is likely to generate significant amounts of vehicle movements
- 2.119 Paragraph 117 of the NPPF (2023) which states that *“all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”* Vistry therefore considers that Policy TR03 is **consistent with National Policy**.
- 2.120 A future planning application on Addlepool Farm will be supported by relevant Travel Plans and Transport Assessments.

### **Policy TR04: Parking Standards**

- 2.121 Whilst Vistry do not object to a parking policy within EDDC's emerging LP, we question whether the proposed requirement for an average of 1.7 spaces per residential dwelling is **effective**, and request that greater clarity be provided within the proposed policy text.
- 2.122 This blanket approach offers no flexibility and does not consider site's locational context, which may justify adopting an alternative approach to parking. Car parking requirements for development schemes should be established on a case-by-case basis.
- 2.123 To ensure that the draft policy is sound, we strongly recommend that the reference to 1.7 spaces per residential dwelling is omitted from this policy.

## Chapter 12. Our Outstanding Landscape

### Policy OL04: Areas of Strategic Visual Importance

- 2.124 Whilst we agree with the need to safeguard the visual and scenic quality of the District, we consider that the policy wording should be revised to acknowledge that a change in a view does not necessarily result in an adverse effect. Development may impact a view, but this impact must be assessed. In such instances where the impact is not considered to be adverse, this should not prevent development from being delivered. It is not always possible for new development to conserve and enhance views of important features in their entirety and/or from every location within a development site from which the view may be obtained; but that also development can open new opportunities for views of important features to be experienced by the public. The policy should be reworded to reflect these considerations.

### Policy OL05: Green Wedges

- 2.125 We agree with EDDC's view on the importance of Green Wedges in that they are a 'long-standing local landscape designation that maintains open green networks between settlements'. It is agreed that Green Wedges play a vital role in preventing urban sprawl and settlement coalescence by maintaining green space separation between towns.
- 2.126 The importance of giving added protection against development in valued green areas is also agreed and therefore this Policy is supported.
- 2.127 Addlepool Farm is not located within a Green Wedge, therefore its delivery would meet this Draft LP Policy aspirations.

### Policy OL10: Development on High Quality Agricultural Land

- 2.128 We agree with the need to protect the best and most versatile land and support the acknowledgement that the protection of this should be balanced with the overriding need for development.
- 2.129 It is disappointing, however, that the policy text remains unchanged from the Regulation 18 Consultation Document. Our concerns therefore remain that the policy's reference that development on the best and most versatile land (Grade 1,2 and 3a) will only be permitted in instances where land of a lower grade is unavailable is not suitable. The policy fails to provide any certainty regarding how this assessment will be undertaken and whether it is for the applicant or decision maker to review other lower grade land within the vicinity of the application site. This leads to a lead to a lack of clarity for the decision maker, applicants and local community.
- 2.130 It is noted that the draft allocation at North of Topsham (WS10) is located on land identified as being Grade 1 (best and most versatile). Its allocation therefore does not accord with this draft policy.
- 2.131 Land at Addlepool Farm does not constitute best and most versatile agricultural land and would represent a more sustainable site that would be suitable for residential development.

## Chapter 13. Our Outstanding Biodiversity and Geodiversity

### Strategic Policy PB01: Protection of Internationally and Nationally Important Wildlife Sites

- 2.132 We **support** Strategic Policy PB01 and agree that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated site should not be permitted subject to meeting specific criteria.
- 2.133 The Exe Estuary RAMSAR, SSSI and SPA are located approximately 0.5km south west of Addlepool Farm. As demonstrated on the concept masterplan, the proposals will extend public access into the Site through substantial new areas of green infrastructure to include new recreational routes. In addition, mitigation for recreational impacts that may occur to any designated sites of international importance from an increase in local residents would be secured as part of the proposals in the form of financial contributions towards improved access management and provision of substantial alternative recreation locations.
- 2.134 The proposed development at Addlepool Farm would comply with Strategic Policy PB01.

### Policy PB02: Protection of Regionally and Locally Important Wildlife Sites

- 2.135 Addlepool Farm is not located within a regionally or locally important wildlife sites, which is noted to include Local Nature Reserves (LNR); County Wildlife Sites (CWS); Unconfirmed Wildlife Sites (UWS); Special Verges designated for biodiversity. The proposed development will not negatively impact Regionally or Locally important wildlife sites and therefore will fully accord with the requirements of this Draft LP policy.

### Policy PB03: Protection of Irreplaceable Habitats and Important Features

- 2.136 We agree that important hedgerows (as defined by the Hedgerow Regulations 1997) should be protected and their loss or degradation should only be permitted where the mitigation hierarchy has been applied and evidenced in earnest.
- 2.137 However, we do not support EDDC's approach to applying the same protection and importance to 'species rich Devon hedges', which do not meet the criteria of 'important hedgerows'. We consider this approach is not justified.
- 2.138 Devon hedges are located across Devon and often along the perimeter of sites. As a result, it is often unavoidable to need to remove part of the Devon hedge to deliver a suitable site access.
- 2.139 The need to retain hedgerows on site, where possible, is adequately addressed under draft LP policy PB08, which acknowledges that there may be instances where the removal of hedgerows is justified and unavoidable. There is no justification to include Devon hedges within draft LP policy PB03.

**Strategic Policy PB04: Habitats Regulations Assessment**

- 2.140 We support the inclusion of a policy relating to Habitats Regulations Assessment and a requirement that new development must not adversely affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017. We also agree that, where potential adverse impacts are identified, suitable avoidance, mitigation and compensation measures will be required.
- 2.141 It is understood that the SEDESMS is currently undergoing a review and will apply a new strategic approach to HRA mitigation. The Draft LP policy states that all residential schemes within 10km of any European sites will need to provide mitigation to offset recreational pressures. It is assumed that such mitigation will need to accord with the revised HRA mitigation that is yet to be published/completed. Until the updated HRA mitigation is completed and made available it is not possible to provide a comprehensive assessment of this Draft LP policy and understand whether it meets the tests of soundness.
- 2.142 The Exe Estuary RAMSAR, SSSI and SPA are located approximately 0.5km south west of Addlepool Farm. As demonstrated on the concept masterplan, the proposals will extend public access into the Site through substantial new areas of green infrastructure to include new recreational routes. In addition, mitigation for recreational impacts that may occur to any designated sites of international importance from an increase in local residents would be secured as part of the proposals in the form of financial contributions towards improved access management and provision of substantial alternative recreation locations.

**Strategic Policy PB05: Biodiversity Net Gain**

- 2.143 Whilst Vistry Group understand the principle of the inclusion of a policy to deliver Biodiversity Net Gain (BNG) on new development, Vistry Group **strongly object** and believe it is important for the required threshold to align with the mandatory requirement of 10% to ensure consistency with the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) and avoid having any undue adverse implications on the viability and overall deliverability of any sites coming forward as part of the plan-making process.
- 2.144 The current policy is **unsound** as the proposed requirements are not considered to be justified or supported by a robust evidence base. To be sound, any new policy that seeks to go beyond the mandatory BNG requirements needs to be supported by sufficient technical information and an evidence base that demonstrates that the policy is **justified** and **effective**.
- 2.145 The PPG states that “Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced, including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.”

- 2.146 In seeking to justify increasing the requirement for on-site BNG twofold, EDDC reference Evidence Document ENV-025 'Nature Recovery Declaration for East Devon'. This supporting document sets out the Local Nature Recovery Strategies within East Devon, and states that these have been *“designed to work closely alongside other measures in the Act. They will, for example, support delivery of mandatory Biodiversity Net Gain (BNG) and provide a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity”*. This implies that the report has been prepared on the assumption that developments will be delivering the mandatory BNG (at 10%).
- 2.147 The statement notes the existing nature recovery plans/delivery partners (which include AONBs, Clyst Valley Regional Park, Triple Axe Initiative and EDDC Countryside) and potential new projects, strategy and policy, none of which reference or justify the inclusion of a Draft LP policy that requires 20% BNG on all development sites.
- 2.148 This policy is not supported by robust evidence.
- 2.149 Notwithstanding the lack of suitable evidence to underpin this draft Policy, we also object to the viability assumptions included within the draft LP Viability Assessment. EDDC's Local Plan Viability Assessment (Core Submission Document CSD-004), prepared by Three Dragons attributes a financial assumption of £1,188 per dwelling (greenfield) and £321 per dwelling (brownfield) to account for delivering EDDC's Draft LP policy of 20% BNG. Within the supporting text of this viability assumption, Three Dragons reference a MCLG report (2019) which includes sensitivity analysis regarding the achieving 20% BNG and makes assumptions on the cost implications for this on developers. The MCLG Report states that increasing the BNG to 20% would result in a 19% net additional direct cost to developers (annual). It is noted that the MCLG Report concludes by stating *“our chosen policy approach, which sets out that 10% is the right level to demonstrate net gain, considers this trade-off among other issues”*, which further emphasises that EDDC's proposal to increase the BNG provision to 20% is not appropriate. We have two key concerns regarding relying upon this MCLG report to justify EDDC's Draft LP viability assumptions:
- 2.150 Firstly, the MCLG document's cost benefit change by scenario is based on 2017 prices and is therefore 8 years' old at the time of this Regulation 19 Consultation.
- 2.151 Secondly, there have been significant changes to the DEFRA metric since the publication of the MCLG Report, which has altered how BNG is calculated on site. Reliance upon this report and cost benefit change is not robust or justified.
- 2.152 We have significant concerns regarding the need for all new developments to deliver 20% biodiversity net gain, which is not justified or underpinned by robust evidence base and therefore cannot be considered sound.

#### **Strategic Policy PB06: Local Nature Recovery Strategy and Nature Recovery Network**

- 2.153 Vistry support Strategic Policy PB06 and the need for new development with identified LNRS / NRN to contribute to their importance, through habitat creation appropriate to network type.

- 2.154 Addlepool Farm is not located within a nature recovery network, however, it will deliver targeted ecological mitigation areas and significant biodiversity improvements, alongside new habitats and improvements along the existing watercourse corridor.

**Policy PB07: Ecological Enhancement and Biodiversity in the Built Environment**

- 2.155 We support the overall principle of this policy, and the importance for new development to deliver ecological enhancements.
- 2.156 We have significant concerns, however, regarding the lack of flexibility within the policy wording, which states the following requirements:
- One integrated bird box per dwelling;
  - Provision of integrated bat boxes;
  - An integrated bat loft within all major developments;
  - Gaps in fences to facilitate the movement of hedgehogs; and
  - Provision of overhanging eaves for nesting house martins in all major developments
- 2.157 Additional flexibility should be provided within the policy wording to allow ecological enhancement features to be determined on a case-by-case basis and to be influenced by site context and ecological opportunities.

**Policy PB08: Tree, Hedges and Woodland on Development Sites**

- 2.158 Vistry **support** this policy, particularly the recognition that there may be instances where tree and hedgerow removal is unavoidable. In such instances, loss of trees must be justified with mitigation and replacement planting to support biodiversity net gain.
- 2.159 The proposals at Addlepool Farm will seek to minimise tree and hedgerow loss, in addition to substantial new habitat creation measures, including species-rich wildflower meadows and dense woodland and thicket buffer planting. This will deliver biodiversity net gain and improve habitat diversity on the Site.

**Policy PB09: Monitoring Requirements for New Planting Schemes**

- 2.160 Vistry **object** to this policy, which is not justified and therefore **not sound**.
- 2.161 The draft policy requires annual inspection reports to be prepared and issued to the LPA for a period of 5 years following completion of the planting works. It should be acknowledged that developers will often transfer the ownership of a scheme's public open space to a Management Company, whom would be responsible for the on-going maintenance of the scheme's planting. It is not justified for the developer, whom will no longer have any ownership of the land, to be held accountable for submitting annual inspection reports to the LPA, as alluded to within Part B of this draft LP policy.
- 2.162 We strongly encourage this element of the policy is omitted.

## Chapter 14. Open Space and Sports and Recreation

### Strategic Policy OS01: Access to Open Space and Recreation Facilities

- 2.163 We **support** the principle of this policy and the need for new development to deliver new and enhanced high quality open space.
- 2.164 The proposed development at Addlepool Farm shall deliver a variety of informal and formal public open space, which could include allotments, community orchard and formal play pitches, therefore making a positive contribution towards this policy.

### Policy OS02: Sport, Recreation and Open Space Provision in Association with Development

- 2.165 Vistry acknowledge the need for the draft LP to include a policy stipulating open space provision on new developments, however consider, at present that the policy wording does not provide sufficient flexibility and will be **ineffective**, hindering housing delivery.
- 2.166 Whilst the policy suggests that the provision and typology of public open space on sites could depart from the policy's typology breakdown, the scenarios upon which this may be acceptable is not considered to go far enough. The Council have failed to acknowledge that site topography and context should influence the open space typology that should form part of a future scheme.
- 2.167 Addlepool Village is centred on promoting healthy communities and is proposed to deliver significant quantum of public open space, village green, allotments, new woodland, potential for sports pitches, community orchard, and children's play areas.

### Policy OS03: Location of Facilities for Sport and Recreation and Open

- 2.168 We **support** draft LP policy OS03, which supports the provision of new open space areas, sports facilities and parks and gardens, or for the upgrading or enhancement of existing facilities provided that unacceptable adverse amenity or environmental impacts do not arise from development.
- 2.169 Addlepool Farm will deliver significant areas of public open space, which will include both informal and formal typologies. The proposals will provide significant public benefits to the existing residents of Clyst St George as well as the future residents of the development and would ensure safe pedestrian and cycle accessibility in accordance with this Draft LP policy.

### Policy OS04: New Allotments and Avoiding the Loss of Existing Ones

- 2.170 Vistry **support** the principle of policy OS04, which states that new allotments will be granted planning permission where they are well related to settlements and will avoid adverse environmental or amenity impacts.
- 2.171 The concept masterplan for Addlepool Village demonstrates that the future scheme could deliver allotments, should there be an evidenced demand. The allotments would serve the residents of the new village, therefore avoiding adverse environmental impacts.

## Chapter 15. Our Outstanding Historic Environment

### Strategic Policy HE01: Historic Environment

- 2.172 We acknowledge the requirements of draft policy HE01 and the need for new development that will affect heritage assets to take account of their significance.
- 2.173 In respect of Addlepool Village the proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. Key view corridors have been retained and are proposed as green space to ensure that the intervisibility of the church tower can be preserved. It is agreed that the HELAA (2022) assessment concluded that the Site will not have an unacceptable impact on heritage.

### Policy HE02: Listed Buildings

- 2.174 It is agreed that developments affecting heritage assets should enhance their significance and support conservation, contributing to local character. Vistry support this policy which would appear to adhere to National Planning Policy.
- 2.175 In respect of Addlepool Farm, it is acknowledged that Clyst St George Church (Grade II) is located to the northwest of the Site and there are locations within the Site which have some visibility of the church tower. The proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. Key view corridors have been retained and are proposed as green space to ensure that the intervisibility of the church tower can be preserved.
- 2.176 It is agreed that the HELAA (2022) assessment concluded that the Site will not have an unacceptable impact on heritage.

### Policy HE03: Conservation Areas

- 2.177 It is agreed that proposals for development within or affecting the setting of a Conservation Area must conserve or enhance its special interest, character, setting and appearance, and this would appear to accord with National Planning Policy.
- 2.178 As illustrated within the accompanying Vision Document, Addlepool Farm does not lie within or adjacent to a Conservation Area. The nearest is Topsham Conversation Area, approximately 1km from the Site.

### Policy HE04: Archaeology and Scheduled Monuments

- 2.179 It is agreed that developments must protect the Site and setting of scheduled monuments and archaeological remains. We support this policy which would appear to adhere to National Planning Policy.
- 2.180 A future application on Addlepool Farm would be supported by all relevant technical information relating to archaeology, including a geophysical survey, to ensure that it accords with this draft policy.

**Policy HE05: Historic Landscapes, Parks and Gardens**

- 2.181 We **support** this policy which appears to adhere to National Requirements and states that developments affecting registered Historic Landscapes, Parks, and Gardens must conserve or enhance their character.
- 2.182 Addlepool Farm is not constrained by historic landscapes, parks or gardens and offers the opportunity to deliver a sustainable landscape-led new settlement that will deliver significant benefits to East Devon.

**Chapter 16. Community Facilities****Policy CF01: New or Extended Community Facilities**

- 2.183 Whilst Vistry **support** Draft Policy CF01 in principle and the proposed tests, Vistry believe that this policy must consider new or extended community facilities on a case-by-case basis. This is particularly with regards to new development and the additional community facilities that may be proposed as the facilities be in close proximity to build-up areas.

### 3. DRAFT LP EVIDENCE BASE: LAND AT ADDLEPOOL FARM (SITE REFERENCE CLGE\_28 & CLGE\_37)

#### Introduction

- 3.1 To assist EDDC in considering the merits of the Site, a review of the Draft LP's Evidence Base has been undertaken in the context of land at Addlepool Farm.
- 3.2 It is noted that both site references CLGE\_28 and CLGE\_37 are of the same site area, with site reference CLGE\_37 superseding the previous CLGE\_28.

#### Draft LP Evidence Base

##### **Housing and Employment Land Availability Assessment (HELAA) Final Report November 2022 (HOU-003)**

###### *HELAA (HOU-003) Appendix E(iii)*

- 3.3 An assessment of the Site was provided with regards to residential development under the reference Clge\_37 within Appendix E(iii) the HELAA Final Report (HOU-003).
- 3.4 It is welcomed that the HELAA (2022) assessment concluded that the Site was evidenced to be available, suitable and 'achievable' for housing. In addition, the Site was assessed as suitable for available and suitable for employment land.
- 3.5 The Site was confirmed to 'pass' Stages A and B of the Site Suitability Assessment and considered able to deliver 554 dwellings. Appendix I of the November 2022 HELAA (HOU-003) provided an indicative housing trajectory for Clge\_37 from 2021 to 2041+.

#### Sustainability Appraisal (SA) (CSD-003a)

##### **SA Site Criteria**

- 3.6 It is noted that the SA Site Criteria is as follows:
- a. Site is assessed as 'suitable, available and achievable' in the Housing and Economic Land Availability Assessment (HELAA);
  - b. Site is located:
    - i. within, or adjacent to, settlements in Tiers 1-4 of the settlement hierarchy (excluding Cranbrook); or
    - ii. adjoining another site that is adjacent to a settlement in Tiers 1-4, and is also well related to that settlement; or
    - iii. as a freestanding large-scale, sustainable new settlement, or able to be part of a new settlement; or

- iv. adjacent to Exeter or other development in the West End; or
  - v. adjacent to an existing business park (if site is proposed for employment use)
- c. Site is not already allocated in a 'made' Neighbourhood Plan
- d. Sites in criteria a) or b) that already have planning permission will be noted but not reassessed at stage 3, unless the owner/site promoter submits the Site for a different use or the Site is no longer deliverable
- 3.7 Land at Addlepool Farm has not been assessed as an individual site within EDDC's SA. This is considered to represent a shortcoming within the assessment.
- 3.8 We strongly consider that land at Addlepool Farm must be reassessed by Officers as an individual site, which can deliver housing to meet EDDC's housing needs in the short to medium term.
- 3.9 We note that the new settlement options have been assessed as alternatives within the SA, and Addlepool Farm is identified as lying within Option 3. In the absence of any SA assessment for Addlepool Farm, we have reassessed the Site on an individual basis and included our assessment below.

### SA Assessment – New Settlement Option 3

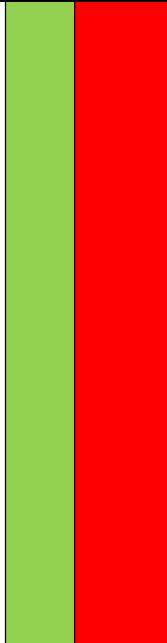


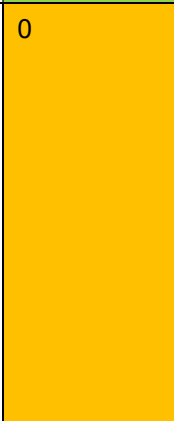
- 3.10 Boyer have undertaken an assessment of the Sustainability Appraisal (CSD-003a) Framework with regards to land at Addlepool Farm which is detailed below.

**Table 3.1 Assessment key extracted from Sustainability Appraisal (CSD-003a) (Page 16)**

The policy/option/site is likely to have...	
++	A major positive effect overall in contributing towards the achievement of the objective.
+	A minor positive effect in contributing towards the achievement of the objective.
0	A negligible or no effect in contributing towards the achievement of the objective, or some positive and some negative impacts thus the balance overall is neutral.
-	A minor negative effect in contributing towards the achievement of the objective.
--	A major negative effect in contributing towards the achievement of the objective
?	An uncertain effect in contributing towards the achievement of the objective.
+ / -	A mixture of positive and negative effects in contributing towards the achievement of the objective.

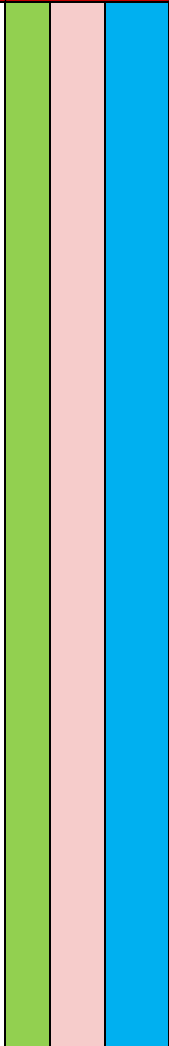
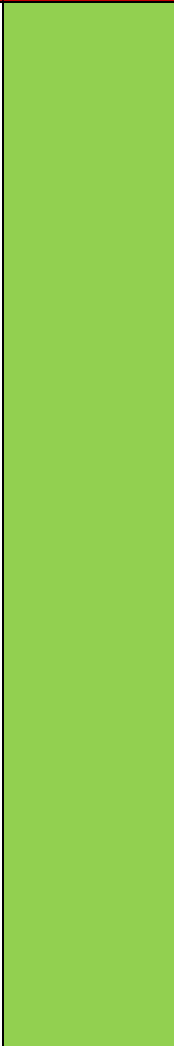
**Table 3.2 Land at Addlepool Farm Sustainability Appraisal Assessment**

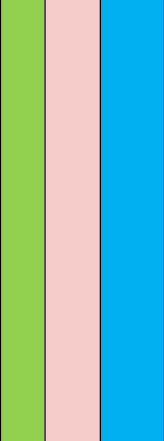

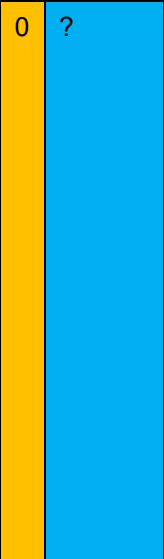

SA Objective	SA Score		SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
<p>1. Biodiversity</p> <p>To conserve and enhance the habitat and wildlife of our natural environment.</p>	+	--	<p>No option is within or adjacent to any statutory wildlife sites - Option 3 is 0.4km from the Exe Estuary (SPA, Ramsar, SSSI). However, all options are within the 10km recreational buffer zone for the Exe Estuary and Pebblebed Heaths within which new dwellings must provide mitigation for visitor pressure under the 'current' Local Plan 2013-31. The majority of Option 3 (95%) falls within the 10km buffer from Dawlish Warren SAC.</p> <p>There are no local wildlife sites located in Option 3, with one just 10m away from the boundary, and a further 10 sites within 1km. All options include Habitats of Principal Importance (HPI) and Devon Biodiversity Action Plan habitats, such as woodlands, veteran/ancient trees, hedgerows, rivers/streams, and ponds/lakes.</p> <p>Option 3 has some overlap with the ecological network, especially links east-west, with closer proximity to statutory sites and supporting habits, with potential</p>	<p>The Site is supported by a Preliminary Ecological Appraisal (PEA) to identify important ecological features. The PEA found the Site to be dominated by uniform agricultural land of low ecological value, both arable crops and cattle pasture.</p> <p>It is noted that there are designated sites of international importance within a 10km radius of the Site. Mitigation for recreational impacts that may occur to these sites from an increase in residents would be secured as part of the proposals, in the form of financial contributions towards improved access management and provision of substantial alternative recreation locations. The concept masterplan also proposes extensive areas of public open space which will include walking routes and will present an alternative option.</p> <p>The Site will not have an unacceptable impact on biodiversity. It is welcomed the EDDC's HELAA (2022) concluded that the Site would have no unacceptable impact on biodiversity.</p>	+

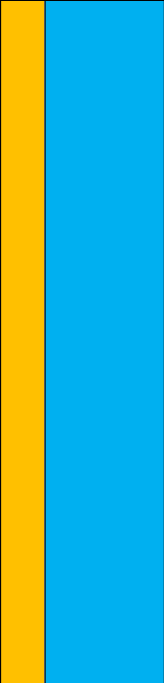

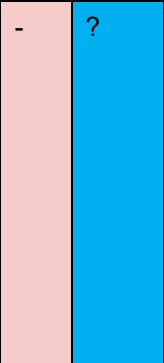

SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
		<p>for fragmentation effects. Protected species have been recorded across all options, but Option 3 has a higher diversity likely due to its position between the Exe Estuary and Pebblebed Heaths.</p> <p>Overall, a major negative for Option 3 given its proximity to the Exe Estuary and greater overall risk to the ecological network. These negative effects are mixed with a long-term minor positive effect due to the legal requirement for biodiversity net gain, which means development must deliver at least a 10% increase in biodiversity value relative to the pre-development value of the onsite habitat.</p>		
<p>2. Landscape</p> <p>To conserve and enhance the special qualities and distinctive character of our landscapes, undeveloped coast and seascape</p>	<p>-</p> 	<p>There are a number of landscape sensitivities that occur throughout each option, such as the character of rural lanes, the presence of large trees and hedges, and the character of existing historic settlements on the peripheries. Much of the area is visible from surrounding high land, including parts of the East Devon National Landscape.</p>	<p>The Site is not located within any statutory or non-statutory landscape character or quality designations. The northern part of the Site benefits from intervisibility between the Site and Clyst St George. It is acknowledged that the southern part of the Site is on slightly elevated ground and the proposed masterplan demonstrates how the new village can be delivered sensitively in respect of its landscape context.</p>	<p>0</p> 

SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
		<p>Unique sensitivities for Option 3, particularly high sensitivity occurs in the south where there is intervisibility with land to the south and the East Devon National Landscape, the east where the land is relatively steep with medieval field patterns, and the setting of Clyst St George in the south west. In addition to Clyst St George, there is potential for settlement coalescence with Clyst St Mary and Ebford, given they adjoin the boundary of Option 3. Across the three Options, land with the lowest landscape sensitivity is found in the northern part of Option 3.</p> <p>Overall, Option 3 has medium landscape sensitivity. Option 3 will have a minor negative effect.</p>	<p>It is welcomed that the HELAA (2022) assessment concluded that the Site would have no impact on NLs.</p>	
<p>3. Historic and built environment</p>	<p>-</p>	<p>There are three Grade II listed properties in Option 3, plus a schedule monument off Woodbury Road on the western boundary of the site, with all other Grade II and II* listed buildings excluded from the land identified for a new settlement.</p> <p>Given this, all Options are likely to have minor negative effect due to potential</p>	<p>It is acknowledged that Clyst St George Church (Grade II) is located to the north west of the Site and there are locations within the Site which have some visibility of the church tower.</p> <p>The proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. Key view corridors have been retained and are proposed as green space</p>	<p>0</p>

SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
		<p>impact upon the setting of designated heritage assets.</p>	<p>to ensure that the intervisibility of the church tower can be preserved.</p> <p>It is agreed that the HELAA (2022) assessment concluded that the Site will not have an unacceptable impact on heritage.</p>	
<p>4. Climate change and carbon emissions</p> <p>To minimise greenhouse gas emissions.</p>	<p>+ - ?</p>	<p>As all three Options are located in predominantly rural locations, pedestrian connectivity is currently undeveloped. Similarly, there is limited dedicated cycling infrastructure across the Options, but the rural nature of many of the local lanes results in relatively low traffic volumes at present, meaning they can be suitable for cyclists and can be retained through master planning the new community. The proximity of National Cycle Network Route 2 (the Exe Estuary Trail) approximately 1.5km south west of the centre of Option 3 provides a largely traffic-free cycle route to Exeter city centre to the north, and Exmouth to the south.</p> <p>Option 2 is isolated from existing dedicated cycle infrastructure and local topography is</p>	<p>The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements, new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond.</p> <p>We support the HELAA (2022) recognition that <i>“the site is within 1,600 metres of 4 or more different local facilities and within 1,600 metres of a train station or bus route with an hourly or better service”</i>.</p>	<p>+</p>

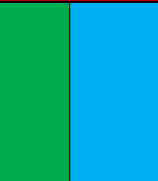





SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
		<p>not conducive to internal cycle movements.</p> <p>A range of bus service frequencies (14 to 85 minutes) are available along the A3052 to and from Exeter to the northern boundary of Option 3. Other bus services are found in close proximity to the south west of Option 3 (Ebford and Topsham). Therefore, all three Options have good existing bus connections.</p> <p>Options 3 benefits from its proximity to Exeter and the series of train stations along the Avocet line which has a half hourly service to Exmouth and Exeter. Topsham train station is 2.3km from Option 3.</p> <p>The timescale of delivering the new settlement means that all new homes should meet the Future Homes standard to be zerocarbon ready. Option 3 offers potential for open loop ground source heat pumps due to an underlying aquifer. All three options are likely to be suitable for solar energy.</p>		

SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
		<p>A minor positive effect is noted for Option 3 given its sustainable travel and net zero carbon potential.</p> <p>These effects are mixed with a negative effect arising from emissions associated with the construction of development. Also, some negative uncertainty in case additional jobs, facilities and sustainable travel links are not provided alongside new housing</p>		
<p>5. Climate change adaption</p> <p>To adapt to the possible effects of climate change.</p>	<p>0 ?</p> 	<p>Climate change is likely to mean more frequent drought, heatwaves, extreme precipitation and storm events.</p> <p>Extreme precipitation and storm events are likely to increase fluvial (river) and surface water flood risk. Areas of medium-high flood risk in Option 3 are generally limited in extent to small areas of land associated with watercourses, apart from a larger area on the north of the option shown as flood zone 3, immediately south of the A3052. In addition, surface water flood risk covers other slithers of land.</p>	<p>The Vision Document demonstrates that any areas of the Site at risk of flooding (from all sources) would be kept free from development. Any future scheme would be supported by a comprehensive drainage strategy that would demonstrate that the proposed development would be safe for its lifetime. In accordance with DCC aspirations, the proposed development would seek to deliver a betterment to existing greenfield run off rates, therefore delivering a minor positive effect.</p>	<p>+</p> 

SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
		<p>All Options can contribute to leakage reduction through the inclusion of new water supply infrastructure. Option 3 contains the largest mix of soil types that may present additional challenges from soil subsidence. Option 3 also has the greatest risk from increased surface water flood risk as a result of development.</p> <p>Overall, all Options have predominately low flood risk, but contain small areas of medium-high fluvial and surface water flood risk – built development can avoid these areas with relative ease. All Options are likely to have a neutral effect overall with uncertainty depending on further assessment of soil types.</p>		
<p>6. Land resources</p> <p>To utilise our land resources efficiently and minimise their loss or degradation.</p>		<p>All Options are currently large, greenfield sites. A relatively large area of Grade 1 agricultural land covers the northern part of Option 3, the remainder being Grade 3.</p> <p>Option 3 is not affected by minerals, waste, nitrate or phosphate zones.</p> <p>Overall, all Options are currently large, greenfield sites, that are likely to result in</p>	<p>The majority of the Site comprises of Grade 3 (good to moderate) land classification. The Site is not affected by not affected by minerals, waste, nitrate or phosphate zones.</p>	

SA Objective	SA Score		SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
			<p>the loss of best and most versatile agricultural land, with some areas affected by minerals and waste zones. Therefore, a minor negative effect is likely for all Options, with some uncertainty as detailed agricultural land classification data is not available across all Options.</p>		
<p>7. Water Resources</p> <p>To utilise our water resources efficiently and minimise their loss or degradation.</p>	-	?	<p>All three Options are likely to require a significant level of reinforcements to the drinking water network due to the scale of proposed development. Each Option has an opportunity to connect to an existing trunk main (along the A3052, or on London Road, north west of Option 1) to provide a water supply, and the reinforcements required to accommodate the new development would not be differentiated between the Options.</p> <p>In terms of foul drainage impacts on water quality, all Options fall within the same sewerage catchment area which drains generally to the west and discharges to the Countess Wear treatment works. As all Options are in generally rural settings there are no significant existing</p>	<p>The Site is not within a groundwater source protection zone or the River Axe SAC phosphates catchment</p>	0

SA Objective	SA Score		SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
			<p>foul/combined drainage networks present, and there is current uncertainty as to whether a new treatment works should be built specifically for the development that can discharge to the local watercourse network, or a connection is made to Countess Wear treatment works – the scale of proposed development mean that improvements are likely to be required to this treatment works.</p> <p>Overall, a minor negative uncertain effect is likely for all Options given the need for further assessment and the likely lack of capacity at existing treatment works.</p>		
<p>8. Homes</p> <p>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure to meet East Devon’s needs.</p>	++	?	<p>All Options are able to deliver a significant number of new homes, including a range of types, sizes and affordable housing, so a major positive effect is likely for all. A relatively large proportion of the land in Option 3 has not been submitted by the landowners, so are unknown. Therefore, an uncertain effect has been added to Options 3.</p>	<p>Addlepool Village will be a self-contained new village, whilst connecting the development both visually and physically to the existing surrounding settlements of Ebford and Clyst St George. The proposals will include approximately 700 homes (including both market and affordable homes), making a significant contribution towards EDDC’s local housing need in the short to medium term.</p> <p>The Site is owned by a single landowner and under the control of Vistry Group, who as the largest housebuilder in the UK by number of</p>	++

SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
			<p>dwelling completions annually, are well positioned to both promote and construct the proposed new homes, seeing the project through from inception to completion.</p>	
<p>9. Health and well-being</p> <p>To support healthy, safe and active communities where people have access to attractive and functional recreation spaces</p>	<p>-</p> 	<p>The rural nature of the area means a current lack of public recreation spaces for all three Options.</p> <p>None of the options are located in an area of higher deprivation (among 50% most deprived neighbourhoods in England), meaning that development cannot assist in improving deprivation levels in such areas. A small, northern part of Option 3 also adjoins the A3052, but a greater noise issue is likely from the A376 which runs along its western boundary, with noise also from the B3179 Woodbury Road running through the southern part of the site.</p> <p>Overall, a negative effect is likely from all three Options due to the lack of recreation space, and noise from main roads, the Airport, and business parks.</p>	<p>Addlepool Farm will be a self-contained new village, providing significant areas of new public open space, which will include allotments, sports pitches and walking routes, centred on health and well-being of future residents.</p> <p>The proposed development will meet and contribute to the objectives of the Clyst Valley Trail and wider network.</p>	<p>+</p> 
<p>10. Access to services</p>	<p>-</p> 	<p>The rural location of the three Options means there is currently limited access to</p>	<p>The Site is in close proximity and with good connectivity to the main district and regional</p>	<p>+</p> 

SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
<p>To provide accessible and attractive services and community facilities for all ages and interests.</p>		<p>services and facilities. As noted under objective 4, a regular bus service runs along the A3052 which adjoins (Option 3). Option 3 adjoins Clyst St George to its south west, which contains a primary school and village hall.</p> <p>A negative effect is therefore likely for all three Options, based on current access to services. However, it is highly likely that a development of 8,000 dwellings will also include a wide range of services and facilities – as noted in the mitigation measures, a major positive post-mitigation effect is likely.</p>	<p>centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is served via several bus services, including 56, 57</p> <p>Gold, 58C and the 95. These routes provide connections to Topsham, Woodbury, Exeter and the villages in between. The nearby station at Topsham is located approximately 1 mile (1.6km) to the west of Addlepool Village. Great Western Rail service provides connections to Exeter, Plymouth, Taunton and beyond, including London Paddington.</p> <p>The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements, new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond.</p>	
<p>11. Jobs and employment To foster a strong and entrepreneurial economy</p>	+	<p>All Options will provide positive effects from job opportunities during construction. The large-scale of the sites also mean a</p>	<p>The delivery of the proposed development will create numerous construction jobs and will contribute to the local economy through construction workers' spending. The provision of</p>	+

SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
and increased access to high quality skills training to support improved job opportunities and greater productivity.		<p>significant amount of employment land should be provided on-site.</p> <p>Option 3 benefits from its proximity to Exeter due to the volume of employment opportunities located within the city. Option 3 is also in close proximity to other employment opportunities at Winslade Park, Darts Farm, and Topsham.</p> <p>Option 3 will have a minor positive effect.</p>	<p>an onsite community hub will also deliver additional economic benefits through the creation of new employment.</p>	
<p>12. Town centres</p> <p>To safeguard and strengthen the vitality and viability of town centres.</p>	-	<p>As the three Options are located in what is presently a largely rural area, they are all beyond 1,600m of a town centre, so will likely have a minor negative effect. However, it is highly likely that a development of 8,000 dwellings will also include a town centre – as noted in the mitigation measures, a major positive post-mitigation effect is likely</p>	<p>The proposed development is in proximity to Topsham and therefore the future occupiers of the development will contribute to the long-term vitality and viability of East Devon’s towns. The proposed development will not compete with the facilities and services on offer in nearby Topsham, however, will provide some on-site retail to meet basic needs.</p>	+
<p>13. Connectivity and transport</p> <p>To connect people and businesses digitally and physically through the</p>	+	<p>As noted under objective 3, all three Options are located in predominantly rural locations meaning that pedestrian connectivity is currently undeveloped. Similarly, there is limited dedicated cycling infrastructure across the Options, but the</p>	<p>The Site is in close proximity and with good connectivity to the main district and regional centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is served via several bus services, including 56, 57 Gold, 58C and the 95. These routes</p>	+

SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
<p>provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon</p>		<p>rural nature of many of the local lanes results in relatively low traffic volumes, meaning they can be suitable for cyclists. The proximity of National Cycle Network Route 2 (the Exe Estuary Trail) approximately 1.5km south west of the centre of Option 3 provides a largely traffic-free cycle route to Exeter city centre to the north, and Exmouth to the south.</p> <p>A range of bus service frequencies (14 to 85 minutes) are available along the A3052 to and from Exeter, running along the northern boundary of Option 3. Other bus services are found in close proximity to the south west of Option 3 (Ebford and Topsham). Therefore, all three Options have good existing bus connections.</p> <p>Option 3 benefits from its proximity to Exeter and the series of train stations along the Avocet line which has a half hourly service to Exmouth and Exeter. Topsham train station is 2.3km from Option 3. The lack of car parking at Topsham, Exton and Newcourt may deter those</p>	<p>provide connections to Topsham, Woodbury, Exeter and the villages in between. The nearby station at Topsham is located approximately 1 mile (1.6km) to the west of Addlepool Village. Great Western Rail service provides connections to Exeter, Plymouth, Taunton and beyond, including London Paddington.</p> <p>The Site is located in an area with superfast broadband (30mbps plus) as a minimum.</p>	

SA Objective	SA Score	SA Commentary (New Settlement Option 3)	Boyer response relating to land off Addlepool Farm	Boyer Score
		<p>wishing to drive a car and then use the train.</p> <p>The three options offer good highways connectivity, with all being adjacent to main 'A' roads, and 2-3km east of the M5. Option 3 is adjoined to the A376 along its western boundary, and a short section of the A3052 to the north.</p> <p>Traffic modelling indicates that Option 3 would have traffic impacts at the Clyst St Mary roundabout.</p> <p>All three options will be equally suitable for good digital connectivity (fibre) given the proposed number of new residential and business customers that will be connecting to the networks.</p> <p>Given the above, a minor positive effect likely for Option 3.</p>		

3.11 The revised site suitability assessment for land at Addlepool is therefore as follows:

**Table 3.3 Revised Sustainability Appraisal Assessment for land at Addlepool Farm**

	SA Objective																			
	1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.	13.							
East Devon SA assessment	+	--	-	-	+	-	?	0	?	-	?	-	?	++	?	-	-	+	-	+
Boyer revised assessment	+	0	0	+	+	0	0	++	+	+	+	+	+	+	+	+	+	+	+	

## 4. OMISSION SITE – ADDLEPOOL FARM

### Introduction

- 4.1 In order for the Plan to be found sound, Addlepool Farm must be identified as an allocation for a landscape-led development of 700 homes, primary school, community hub, local centre and public open space.
- 4.2 Land at Addlepool Farm offers an opportunity to deliver a sustainable new village, creating homes for a new community, which respects and enhances the local character and needs of the area.
- 4.3 To this end, a draft policy is set out below for inclusion within the emerging East Devon Local Plan.

### DRAFT POLICY – Addlepool Farm

*Proposed development at Addlepool Farm to deliver a residential-led development, comprising:*

- *Up to 700 dwellings (including market and affordable housing);*
- *A 2-form entry primary school;*
- *A Community hub;*
- *A local centre providing opportunities for flexible workspaces and retail units;*
- *Extensive green infrastructure, including a new village green, public open space, allotments and formal play areas;*
- *New woodlands, with additional thicket, tree and hedgerow planting; and*
- *Attractive walking and cycling connections, encouraging healthy and active lifestyles.*

### Vision Document

- 4.4 As set out in the accompanying Vision Document, the Site offers an opportunity to deliver a high quality, self-contained, and sustainable new village, creating homes and a neighbourhood which complements the existing character and needs of the local area. The vision document and masterplan summarise the opportunities and constraints of the Site and how all impacts of development can be successfully mitigated.

### Landscape and Design

- 4.5 The Site is not located within any statutory or non-statutory landscape character or quality designations. The northern part of the Site benefits from intervisibility between the Site and Clyst St George. As the southern part of the Site is on slightly elevated ground, the proposed masterplan has been prepared to sensitively integrate the new village within the landscape.

### **Highways/Access**

- 4.6 The Site offers access via Woodbury Road (B3179) and is sustainably located near the main district and regional centres of Topsham and Exeter. Clyst St George benefits from good public transport connections to Topsham, Woodbury, Exeter and the villages in between. Topsham Railway Station is located approximately 1 mile (1.6km) to the west of Addlepool Village, with Great Western Rail providing connections to Exeter, Plymouth, Taunton and beyond, including London Paddington.
- 4.7 The proposed development will enhance the Site's connectivity by introducing improved bus services, cycling routes and pedestrian connections. The accompanying masterplan includes the creation of a local centre, a new primary school, expanded green infrastructure, biodiversity enhancements, new public open space. This will enhance the facilities and services for residents in Clyst St George and surrounding areas and expand access to the countryside.

### **Flooding and Drainage**

- 4.8 The majority of the Site is located in Flood Zone 1, indicating minimal flood risk. A small area to the northern boundary is located within Flood Zone 3. However, the Site has been masterplanned to allow for all development to be located within Flood Zone 1. Drainage basins will be strategically positioned in the lowest points of the Site, ensuring they remain outside of surface and fluvial flood zones.

### **Ecology**

- 4.9 Located approximately 0.5km from the Exe Estuary RAMSAR, SSSI and SPA, the land at Addlepool Farm has undergone a preliminary ecological appraisal. The assessment found the Site predominantly consists of uniform agricultural land of low ecological value. To address this, the proposed development will include approximately 17.45ha of public open space. This, combined with financial contributions towards improved access management, will help mitigate any potential recreational impacts from the anticipated increase in residents, ensuring that ecological impacts are mitigated.

### **Heritage**

- 4.10 Clyst St George Church, a Grade II listed building, is located to the northwest of the Site, with the church tower visible from some parts of the Site. The proposed masterplan has carefully considered the preservation of these views, retaining key view corridors and green spaces. The masterplan has designed the new village to carefully integrate with the landscape setting.

### **Summary**

- 4.11 The Site is sustainably located and is suitable, deliverable and achievable. All constraints to development have been identified and potential mitigation identified to allow the Site's delivery.

- 4.12 With appropriate masterplanning and design, the Site can deliver a sustainable new self-contained village that could contribute to the local housing needs of East Devon.