

Filtered Data Export

Full name: Coral Curtis

Organisation (where relevant): Grassroots Planning

Other party name (if relevant): Broadclyst LVA LLP

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD07

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::
Brcl_12

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See uploaded letter. We support the emerging Spatial Strategy and welcome the site's (ref. Brcl_12) inclusion as an allocation to help meet the identified housing and employment needs. Overall, many of our previous comments on the first version of the Regulation 19 Local Plan still apply - we are only aware of one comment having been incorporated into the updated plan, relating to the timescale for the completion of self-build plots. We therefore continue to suggest that the Council carefully considers the constructive comments provided in relation to endeavouring to meet the full housing need for the district at this stage, particularly given the proposed changes to the NPPF for consultation, as well as other more specific policy requirements. In particular we have continued to suggest that the site should be allocated for 145 homes, as opposed to 100, in order for an effective use of land to be delivered as part of the development. It has also been demonstrated and is recognised by East Devon District Council that Land west of Whimple Road, Broadclyst (ref. Brcl_12) is a suitable, sustainable, accessible and deliverable site for residential and employment development, which is demonstrated in outline planning application 25/1133/MOUT. Based on the details provided within these and previous representations, we, therefore, hope to see the

allocation for the site maintained – once the Local Plan Examination begins, the planning application that is currently being determined by the Council will demonstrate the site’s deliverability to the Planning Inspectorate to underpin the allocation of this land. Development in the Towns and Villages Strategic Policy SD07 sets out the development allocations at Broadclyst. This now states the following: “The sites/areas listed below, as identified on the Policies Map, are allocated for development. Land west of Whimble Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29) Development of these two sites, on the eastern side of the village, will need to come forward to an agreed Masterplan that provides for a comprehensive development scheme for both land areas. Vehicle access to the combined sites will need to be from Whimble Road with vehicle and pedestrian access from Brcl_12 linking through and into Brcl_29. Through its layout, design and landscaping, development should respond sympathetically to the rural and historic character of the settlement, and should conserve and enhance the settings of designated heritage assets.” While we generally support this approach to development across the two land parcels given the relationship between the two sites and the facilities within the wider settlement, LVA currently only has control over Land west of Whimble Road (ref. Brcl_12).

Notwithstanding, the proposed masterplan for the Brcl_12 site has carefully considered the link between both sites and how they could complement each other. It also includes an indicative suggestion of how Land to east of Town End (re. Brcl_29) could come forward alongside the wider Brcl_12 site, to ensure they dovetail together and the development of Land west of Whimble Road (ref. Brcl_12) does not fetter proposals coming forward on the adjacent Brcl_29 land. LVA is happy to work with the adjacent landowner to allow for vehicular access for Brcl_29 to be delivered via the LVA site. LVA has a positive track record of working collaboratively with other stakeholders and always seeks to enable the best possible spatial planning solution. The final sentence in the policy extract above (see underlined section) has been added as part of the second regulation 19 consultation plan, and specifically seeks that development should conserve and enhance the setting of designated heritage assets. We agree that this matter should be considered as part of any development at the site, and the applicant commissioned Pegasus Group to prepare a Heritage Statement assessing the likely heritage impacts arising from the proposed development. The assessment identified there to be ‘less than substantial harm’, to the lower end of the scale, on the setting of the Grade I Listed Church of St John the Baptist. A similar conclusion was drawn for the Grade II Listed Lake House given the glimpsed views of this asset from certain points within the site. Accordingly, in our planning statement for the application we set out that paragraph 215 of the NPPF needs to be considered, which requires the ‘less than substantial harm’ identified to be weighed against the public benefits of the scheme. In our view, the public benefits of the scheme are significant – most notably, the provision of market, affordable and self/custom-build housing, the provision of employment land, and the provision of significant public open space in the form of a new community

parkland, play area and allotments. In addition, significant Biodiversity Net Gain is provided in excess of the Government's 10% target. Strategic Policy SD07 goes on to state that: Area Brcl_12 – is to accommodate around 100 new homes and 0.6 hectares of employment land. Built form shall be focused on the land to the north-west of Winter Gardens and south of Lake Farm with lower density development forming a frontage onto the road from Burrows Cross within the field to the north-east of Winter Gardens. To the north of Brcl_12 there is scope to provide open space and habitat and other open space areas. We support the general provisions of this policy for Land west of Whimble Road, Broadclyst (ref. Brcl_12), including built form being focused on the land to the north west of Winter Gardens and south of Lake Farm, with lower density development forming a frontage onto the road from Burrows Cross within the field to the north-east of Winter Gardens, and the provision of open space, habitat and other open space areas to the north of Brcl_12. These are elements that are featured and met through our proposed masterplan for the site. Notwithstanding, as set out and demonstrated in previous representations to the Local Plan, we consider that the site can deliver up to 145 dwellings (including affordable housing and custom-self build plots), while still accommodating the other required and important aspects of the scheme. These include 0.6 hectares of employment land, access from Whimble Road, as well as a community play area. Significant areas of public open space are also included that are well in excess of what would be required by policy and will in effect deliver a large area of publicly accessible parkland for the whole village to enjoy. This has been informed by technical work including highways, ecology, landscape, heritage and drainage work, all of which underpin the submitted masterplan design. Furthermore, Highways Officers have confirmed that the access design is sufficient to accommodate this number of homes and the employment provision, and no objections have been raised by the Council's placemaking team or urban designer in respect of density or overdevelopment of the site. We, therefore, consider that this is the optimal solution for the delivery of housing at Broadclyst that would see a multitude of benefits being realised without harm being caused. We therefore respectfully continue to ask for the number of homes to be accommodated on the Brcl_12 site to be increased to 145 dwellings, particularly given the Council is only planning for 80% of the district's overall housing requirement, and this would assist the Council in getting closer to delivering the full requirement now rather than in the future and would assist in providing a degree of contingency should other allocations not come forward or achieve a lower quantum of development. ...It is considered that the policy wording needs further clarity as it is currently not clear whether the 5% requirement relates to the overall housing numbers on site or just the market housing element of the scheme. We suggest that the policy is worded to make clear that this reflects 5% of market housing only ...BNG requirement- We, therefore, continue to suggest that this is investigated further by the Council, and appropriate evidence and justification for the 20% requirement is provided because at

present this has not been provided and we strongly oppose this policy requirement as it is contrary to national policy.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: See uploaded letter. We support the emerging Spatial Strategy and welcome the site's (ref. Brcl_12) inclusion as an allocation to help meet the identified housing and employment needs. Overall, many of our previous comments on the first version of the Regulation 19 Local Plan still apply - we are only aware of one comment having been incorporated into the updated plan, relating to the timescale for the completion of self-build plots. We therefore continue to suggest that the Council carefully considers the constructive comments provided in relation to endeavouring to meet the full housing need for the district at this stage, particularly given the proposed changes to the NPPF for consultation, as well as other more specific policy requirements. In particular we have continued to suggest that the site should be allocated for 145 homes, as opposed to 100, in order for an effective use of land to be delivered as part of the development. It has also been demonstrated and is recognised by East Devon District Council that Land west of Whimble Road, Broadclyst (ref. Brcl_12) is a suitable, sustainable, accessible and deliverable site for residential and employment development, which is demonstrated in outline planning application 25/1133/MOUT. Based on the details provided within these and previous representations, we, therefore, hope to see the allocation for the site maintained – once the Local Plan Examination begins, the planning application that is currently being determined by the Council will demonstrate the site's deliverability to the Planning Inspectorate to underpin the allocation of this land. Development in the Towns and Villages Strategic Policy SD07 sets out the development allocations at Broadclyst. This now states the following: "The sites/areas listed below, as identified on the Policies Map, are allocated for development. Land west of Whimble Road, Broadclyst (Brcl_12) combined with Land to east of Town End, Broadclyst (Brcl_29) Development of these two sites, on the eastern side of the village, will need to come forward to an agreed Masterplan that provides for a comprehensive development scheme for both land areas. Vehicle access to the combined sites will need to be from Whimble Road with vehicle and pedestrian access from Brcl_12 linking through and into Brcl_29. Through its layout, design and landscaping, development should respond sympathetically to the rural and historic character of the settlement, and should conserve and enhance the settings of designated heritage assets." While we generally support this approach to development across the two land parcels given the relationship between the two sites and the facilities within the wider settlement, LVA currently only has control over Land west of Whimble Road (ref. Brcl_12). Notwithstanding, the proposed masterplan for the Brcl_12 site has carefully considered

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3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See uploaded letter.

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currently not clear whether the 5% requirement relates to the overall housing numbers on site or just the market housing element of the scheme. We suggest that the policy is worded to make clear that this reflects 5% of market housing only ...BNG requirement- We, therefore, continue to suggest that this is investigated further by the Council, and appropriate evidence and justification for the 20% requirement is provided because at present this has not been provided and we strongly oppose this policy requirement as it is contrary to national policy.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: TO RESPOND, AS REQUIRED, TO ANY QUESTIONS IN RELATION TO POLICY SD07 AND IN PARTICULAR SITE BRCL_12.

Full name: Olly Ansell

Organisation (where relevant): Grassroots Planning

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

1(b). Does your comment relate to one of the changes listed above?: No

1(c). If the comment is related to a site, please state the site reference here::

Feni_08

Full name: Olly Ansell

Organisation (where relevant): Grassroots Planning

Other party name (if relevant):

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Proposal:

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD18

1(b). Does your comment relate to one of the changes listed above?: No

1(c). If the comment is related to a site, please state the site reference here.:

Feni_08

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

We write on behalf of South West Strategic Developments Limited in relation to the Second Regulation 19 version of the East Devon Local Plan and the proposed allocation at Land Adjacent to Beechwood, Feniton (ref. Feni_08). We have reviewed the updated Local Plan and tracked changes and confirm that we continue to support the emerging Local Plan, including the Spatial Strategy and the continued allocation of Land Adjacent to Beechwood, Feniton for residential development. Our previous Regulation 19 representations set out in detail our support for the allocation, the sustainability of the site, and its availability and deliverability. Those representations remain valid and should be read alongside this submission. We note that the revisions to the Regulation 19 Plan do not materially alter the policy approach to Feniton or the role of the site within the spatial strategy. Since the submission of the previous representations, an outline planning application has been submitted in respect of the site. All consultee comments raised to date have been addressed through the application process, and the proposals are progressing positively. The application is to be reported to Planning Committee on the 27th Jan 2026, further demonstrating the site's deliverability and suitability to underpin its allocation through the Local Plan examination. Accordingly, we welcome the Council's decision to maintain the allocation and confirm our continued support for the Plan progressing to examination on this basis.

