

GITTISHAM PC OBJECTION

The Gittisham Parish Council supports the general direction for managing growth and development in East Devon during the plan period. However, the Parish Council **OBJECT** to the dwelling numbers and the quantity of land allocated for employment which, in the opinion of the Parish Council, are far in excess of that needed or achievable over the plan period. The Parish Council also **OBJECTS** to the late introduction of 2nd choice sites to raise dwelling numbers and which by definition are poor sites from a planning point of view.

The status of current infrastructure pressures including capacities at sewage treatment works, highways, schools, health facilities etc. should surely be a foundation stone of any investigations as regards the thresholds available for bringing forward development and the understanding of what capital investment might be required to support new development. The absence of any clarity regarding these thresholds within the plan is disturbing and potentially undermines the viability of many sites being put forward.

A key factor which does not appear to have been addressed is that of deliverability. Figures must be both realistic and achievable. This is particularly important in relation to dwelling numbers. Setting unrealistic targets leads to uncertainty and failure to meet the 5 year land requirement.

HONITON GROWTH - EMPLOYMENT

The amount of employment land proposed in the plan is in excess of that realistically needed to meet the requirement to support the suggested growth in dwelling numbers.

The extent of this overprovision can be shown by adopting the formulae as promoted in the Plan at 5. Strategy Policy, namely 100 homes equates to an employment need of 0.4ha.

This issue of over provision is particularly apparent in relation to the 15ha of employment land currently allocated at Honiton. The planned residential growth at Honiton for the plan period is currently 471 dwellings which when applying the formulae would require a provision of 2.0ha of employment land.

It may well be argued that to meet existing employment needs that there is a shortfall in the existing employment land provisions and that additional land needs to be allocated to meet any such shortfall. However, given the amount of vacant serviced employment land and vacant floorspace this cannot reasonably be regarded as justification to continue with unrealistic employment land allocations.

In relation to employment land it is inevitable that the continuing development of high quality employment opportunities at Cranbrooke, Skypark, Exeter Science Park and the Enterprise Zone will detract from the attractiveness of other employment sites in East Devon along the A30 corridor and in particular the 15ha of employment land at Honiton.

Allocation Reference **Gitti_03 and Gitti_04**

The Gittisham Parish Council has previously raised concerns about the 15ha employment allocation west of Hayne Lane. The PC continues to **OBJECT** to this allocation. The reasons are summarised as follows:

- The employment allocation extends west of Hayne Lane for 800 metres and will, if developed, result in a highly visible and unacceptable ribbon development

- The development will jut prominently into open countryside leading to a perceived threat of coalescence between Honiton and Gittisham village
- The development will be detrimental to the setting of two AONB's – The Blackdown Hills AONB and the East Devon AONB. The developments would be particularly visible from high ground to the north of the allocation
- Although the Otter valley west of Honiton including the allocation site is not in itself within an AONB, it is of great landscape value and contributes to Honiton's attractive setting
- This employment allocation of 15ha is significantly in excess of what is necessary to serve the needs of Honiton and the surrounding area. There is no statistical evidence of a need for 15ha
- Any viability concerns must not be an over-riding justification for bad planning
- The "local need" for employment and commercial land can be found with existing vacant land and regeneration opportunities at Heathpark
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The local highways infrastructure is inadequate to serve 15ha of employment land and due to the residential development at Hayne Farm will add additional danger to both pedestrian and residential traffic on Devonshire Road
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. A 15ha employment development will increase the regularity and intensification of flooding on the A30 and on the local highways network.

HONITON GROWTH - RESIDENTIAL

The Gittisham Parish Council **OBJECTS** to the proposed allocation **LP_Gitti_05**.

The emergence of "2nd choice sites" is a recent addition in the LP process. By definition they are not the best sites. There are references in previous documentation to generalities e.g. sensitive landscape issues, but there is an absence of any robust planning analysis which would justify bringing forward "2nd choice sites" to help top up the housing figures. It does give the impression that the LP process is being led by statistics and land availability identified through the HELAA process, with pure physical, environmental and social planning considerations taking a back seat. Sustainability concerns also seem to come out as a low priority. The initial sustainability appraisal linked to the HELAA process is limited and does not provide a robust assessment of all planning related matters.

The reasons for this objection are summarised as follows:

- The detrimental impact development will have on the setting of Gittisham Village and its conservation area;
- Development will have a detrimental visual impact to the Area of Outstanding Natural Beauty (AONB) and on the setting of the AONB;
- It is not appropriate to increase further residentially generated traffic and pedestrian movements through the Heathpark industrial estate;

- Additional traffic accessing Hayne Lane or the existing Hayne Farm development will be detrimental to vehicular and pedestrian safety;
- Further development will increase pressure on already overstretched health, social and education services. The local primary school is at capacity and is predicted to continue so;
- Highways, sewers, sewage treatment and surface water infrastructure already at capacity;
- Distance from town centre, schools, health centre/hospital, train station and commercial centre will result in car travel resulting in an unsustainable development;
- Access to Public transport is poor;
- The development would result in the unnecessary loss of high quality, productive agricultural land
- The services (gas, water, electricity, foul and surface water sewers, sewage treatment etc) are inadequate to serve this proposed development and will require considerable investment
- The biodiversity qualities of the existing landscape will be seriously compromised
- Localised flooding occurs regularly and disrupts traffic on the A30. Any further significant residential development will increase the regularity and intensification of flooding on the A30 and on the local highways network.
- Lack of provision of any accessible community facilities to serve this isolated community.

The Parish Council **OBJECTS** to the extension of the Honiton BUAB to include this proposed allocation. It is totally inappropriate and irresponsible to be showing a settlement boundary at this point in time whilst at the same time acknowledging that at best only a small proportion of the identified area may be required (if at all).

The Gittisham Parish Council also has concerns over access to **LP_HONI_01**. This proposed allocation is outside Gittisham parish, but would be accessed through Gittisham Vale. It is not appropriate to increase further residentially generated traffic and pedestrian movements through this area.

Finally, the Gittisham Parish Council is aware that during this consultation period the Housing Secretary Michael Gove has offered planning authorities more flexibility with the government's housing targets.

"It is vital that councils have more influence on the housing needs of their area."

Mr Gove said that the planning system is "not working as it should" and that new development must have "the support of the local communities".

"That requires people to know it will be beautiful, accompanied by the right infrastructure, approved democratically, that it will enhance the environment and create proper neighbourhoods," he said.

"These principles have always been key to our reforms and we are now going further by strengthening our commitment to build the right homes in the right places and put local people at the heart of decision-making."

The Gittisham Parish Council would strongly support a review of the current Consultation Draft Local Plan in the light of this fundamental change to the Governments previous mandatory approach to housing target figures.

The Parish Council is aware of the level of local opposition to further development west of Hayne Lane and would request that this level of local opposition is acknowledged and that the site is deleted from further consideration.