

TO: The planning policy committee at East Devon District Council

FROM: Lorna Collins, James Dishman, Clare Ratcliffe, Mel and Anton Schwarzin

RE: East Devon District Council Local Plan preferred site allocations for Broadclyst – LP Brcl 12 and LP Brcl 29

Date: 15 December 2022

We wish to make reference to the minutes of your meeting dated 1 December 2022 under the section What is the current draft local plan consultation. 'This draft plan sets out what are intended to be a workable set of policies for determining planning applications. The plan also identifies ('allocates') areas of land that are seen from assessment to date as being **appropriate or reasonable** for development. However, it is stressed that it is a draft plan, we are welcoming feedback and all comments received will be taken into account in redrafting and refining the plan.'

In connection with the above, the following text is our feedback specifically in relation to the preferred site allocations for Broadclyst, namely, LP Brcl 12 and LP Brcl 29.

There has been a change in government policy since the local plan was formulated. We quote from The Times, national newspaper, article dated 6 December 2022. *"Gove drops mandatory targets for new homes after MPs rebel – Councils will no longer be forced to comply with mandatory housebuilding targets as part of concessions to head off a backbench rebellion on planning. Under a deal agreed between Michael Gove, the housing secretary, and senior Tory rebels, local authorities will be allowed to build fewer homes if they can show that meeting centrally imposed targets would significantly alter the **character of the area.**"*

We would mention that in the context of the previous paragraph, the Broadclyst Neighbourhood Plan (NP) sets out, after consultation with residents and is evidence based, the requirements for the village. In our opinion, the Broadclyst NP now becomes a more significant determining factor when the site allocations LP Brcl 12 and 29 are considered as being appropriate or reasonable. Technical expertise has been provided by various stakeholders including Angela King and Simon Bates from East Devon District Council (EDDC) as mentioned in the Broadclyst NP under the section entitled "The following have provided Technical Expertise".

This is against a backdrop of industrial scale activities of the commercial sector and certain national charities to monetise land for financial gain instead of maintaining the character and history of villages. Examples are Land Value alliances LLP, company number OC383931, Greenslade Taylor Hunt, is one of the largest firms of chartered surveyors, and the National Trust.

This facilitates landowners offering up land, which satisfies the District Council's requirement to meet, what was, the government's policy. It is now, as previously outlined, the case that councils will no longer be forced to comply with mandatory housebuilding targets. The current methodology of identifying preferred sites at Broadclyst has caused concern and worry for the residents of Broadclyst. In our opinion, a timely decision on the Broadclyst sites as included in the local plan to reject the preferred sites LP Brcl12 and 29 will put the residents' minds at rest.

We know that EDDC is the local planning authority for this area and has a legal obligation to use the Broadclyst Neighbourhood Plan when making decisions on **planning applications** in the Parish.

We recognise that Broadclyst is very attractive when considering housing development but would dispute whether the sites at LP Brcl 12 and LP Brcl 29 will satisfy a development viability assessment. The National Planning Framework considers development viability to be a central consideration in delivering a sustainable development.

The development will also need to comply with all relevant statutory authorities' requirements.

A section 106 agreement, the purpose of which is to mitigate the impact of the development on the local community and infrastructure, will also be required.

Taking the three previous paragraphs together, we would point out that significant costs would need to be considered if the sites went ahead.

The below supporting text, together with images, provides evidence of the severe congestion regarding traffic and lack of footpaths.

In our opinion, the volume of traffic generated by the sites cannot be accommodated on the local highway network without detriment to road safety. There are two access points from the B3181 into Broadclyst village. To the west of the village, it is single track country lanes which access the village, and the latter is the proposed sites for development. In our opinion, there is not sustainable access because there are no formal footpaths and the cost to provide a suitable network of footpaths will be prohibitive compared to the number of housing stock proposed.

In our opinion, because the area is subject to flooding, the cost to provide adequate drainage will be prohibitive compared to the number of housing stock proposed.

We have used the National Planning Policy Framework as a point of reference. This sets out the government's planning policies for England and how these are expected to be applied. Admittedly, these will be subject to change because of the government's change in policy, but remain pertinent for guidance regarding flood risk assessment, infrastructure assessment, character of village, historic environment, highways impact, ecological impact and biodiversity, transport assessment.

The following response takes into account views of local residents who have shared their opinions both at a Parish Council meeting in November 2022 and also on two social media platforms. The first is a group called "Save Broadclyst's Green Spaces" which, in the 3 weeks since its inception already has 190 members. The second is a What's App Group for residents living near Town End, which has 27 members. The views expressed here are also endorsed by Broadclyst resident Ben Evans, who chairs Broadclyst Environment group which has 536 members.

Parish residents support small scale developments of up to 24 dwellings in Broadclyst as evidenced in the Neighbourhood Plan. The consultation process for The Neighbourhood Plan also identified a housing need of 27 open market and 16 affordable houses. This need has already been more than met, as confirmed by the Parish council in December 2022.

Site LP_Brcl_09 is largely supported by residents and it is also included in the Neighbourhood Plan.

We cannot however give support to a plan to build 160 homes on the combined sites at LP_Brcl_29 and LP_Brcl_12 as we feel this represents significant over-development of the village and is causing concern and worry for local people, for reasons that will be outlined. We feel that without substantial mitigation, which might not actually be possible in many instances, these sites cannot contribute to sustainability.

We would also like it recognised that site LP_Brcl_29 was previously brought forward for the Parish Neighbourhood Plan, and following consultation, this site was rejected. However it now appears in the EDDC draft local plan. A separate letter of concern to the landowners (The National Trust) on behalf of 113 residents, has recently been sent to them about this site. Some feel there are other more appropriate sites that The National Trust could have brought forward for development, such as the regeneration of Silverton Mill.

With reference to the National Planning Policy Framework, we ask EDDC to take into account the following with regard to the proposed development sites in Broadclyst Village.

Maintaining Supply and Delivery

National Planning Policy Statement 73 states *“significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes), may be necessary. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way”*

A 15% increase in the size of Broadclyst would be significant. The first issue we have identified is that South West Water’s Heath Cross Pumping Station would not cope with so many houses being built at sites LP_Brcl_29 and LP_Brcl_12.

This was confirmed by their engineers in December 2022, who attended the Winter Gardens site to deal with a sewage overflow (Figure 1). One resident was advised by them that the infrastructure needed to prevent more regular overflow, if these sites are developed, would be very costly and likely to involve a new gravitational line. Therefore, without a major upgrade to the sewage system, the scale of development that is being suggested would see more raw sewage overflow onto the surrounding fields and waterways. For Broadclyst residents, this would be totally unacceptable.

We believe that engagement with South West Water as to the exact remedial action that would be needed is essential prior to progressing these two sites. We would like to know if the costs of such remedial action are likely to be borne by the developers or if it would be South West Water (and ultimately the residents) themselves. We feel that all too often, these are the sorts of hidden issues that are only discovered long after the developers have left.

Broadclyst is also on the edge of the electricity supply network for the area. With the new planning laws requiring low carbon heating and provision of EV charging, the required electricity demand for a development of this size is unlikely to be readily available in such a rural location and the distribution network would need significant reinforcement to be able to meet the needs of the development.

We would like to see prior involvement of The National Grid to find out how so many new homes could be supported without having a detrimental impact on current supply for existing residents.

Supporting a prosperous rural economy

National planning policy statement 85 states that if development occurs in rural areas beyond existing settlements, it must be ensured that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).

Broadclyst itself is surrounded by country roads, many of which are single track in places.

What assurances can we be given that development at the proposed sites will not have an unacceptable impact on our local roads?

We believe it will have an unacceptable impact, because it's likely that development at the proposed scale will add 300 or more cars to village roads that are not designed to cope with this much traffic.

The B3181, the main route into Exeter from the village, is subject to increasing levels of congestion from development at Westclyst (Figure 2), Tithebarn, Monkerton and Pinhoe, already markedly increasing journey times into Exeter.

If the sites are brought forward into the local plan, we think it is essential that pedestrian access to both schools is significantly improved although we are worried that in some places, there is no room for pavements! At present there is a lack of pavements connecting LP_Brcl_29 and LP_Brcl_12 to both of the schools and the bus stop, and similarly there is insufficient pedestrian access connecting LP_Brcl_09 to Clyst Vale College and the bus stop. Unless people feel safe walking to school or to catch the bus, it's far more likely that they will drive. This is currently what is happening already with many of the children who attend the schools, even when parents live within the village itself.

School collection times result in congestion because the local roads were never designed to cope with current traffic volumes. Again, some of the roads going towards the schools are single track, for example the country lane between Town End leading to Burrow Road. This would be one of the access points to the proposed site LP_Brcl_12. The existing lanes often flood in Winter and many are very badly rutted. Adding several hundred more cars will make this situation much worse and will not contribute to building a more sustainable community.

The areas of particular concern with regard to our local roads, include:

- a. Town End Road, which is adjacent to site LP_Brcl_29 and single track in places. There is no capacity to widen this road. There is no pavement for half its length requiring both pedestrians and cyclists to stop and lean into the hedgerow when cars come past, which they occasionally do at speed (Figure 3). It is often used as a cut through to get to Broadclyst Primary school from the Southern side of the village. The rush hour traffic along this road, the parking issues at peak times of day and the safety of pedestrians and cyclists will be made worse if sites LP_Brcl_29 and LP_Brcl_12 are developed.

- b. Town Hill. This road goes past the primary school and onto the main road B3181. This is a very congested road during the school run. There is a lack of pavement for some of the length of this road (Figure 4). Due to a lack of parking provision at Broadclyst Primary school, this road and the surrounding residential streets are used as collection and drop off points and can become very busy and feel unsafe at times.
- c. Clyst Vale College to B3181 bottleneck. This is one of the main routes into and out of the village from the main road going to Exeter and to one of the village bus stops (Figure 5). It is already very congested at peak times which creates an unhealthy environment for pedestrians, who are forced to walk on the road itself in many places due to a lack of pavements. Given the numbers of school children using this route to get to school it needs to be made safer if more development goes ahead in the village.
- d. Road From New Inn towards Clyst Vale Community College. This has no pavements at all for most of its length. If development is to go ahead at sites LP_Brcl_29 and LP_Brcl_12 we anticipate that access would come from somewhere along this road. It would need safe pedestrian access to both Clyst Vale School and the bus stop on the B3181. If this isn't implemented, it's highly likely that new residents will be using their cars which does not fit the ethos of building a sustainable community.
- e. Burrow Farm Road. The country Lane between Burrow Farm and Hayman's House is single track and often flooded in Winter and Spring and can become impassable (Figure 6). It is very near the proposed development sites at LP_Brcl_29 and LP_Brcl_12.
- f. Station Road. This has become a horrible road to navigate at peak times due to the combination of increased traffic since Cranbrook, narrow passing places, sharp bends, the railway bridge which is on a 90 degree angle and the presence of huge haulage lorries that use a depot just after the railway bridge. This road has become a cut through, and also links the village to the Science park and airport. It is also liable to flooding at the Ford. There is no cycle lane, no consistent pavement and no bus service.
- g. Elbury Lane. This is another cut through between Cranbrook and Broadclyst village. It is single track for its entire length and often floods just outside the cottages near Elbury Farm. Many residents are already worried about the volume and speed of traffic using this lane at peak times, especially because it is popular with horse riders and dog walkers.

Improvements to the roads to help cyclists must happen if development is to be sustainable. There are no cycle lanes in the village itself to the main commuter routes to Exeter, and no cycle lane provision on Station Road whatsoever. As mentioned, many of the current lanes are single track, so there is already a conflict between cyclists and cars. There is a joint cycle lane/pedestrian pavement on the B3181 between Broadclyst and Exeter but it is poorly maintained and often so overgrown it forces cyclists onto the main road whenever they encounter branches or people walking.

As a rural community, Broadclyst has several nearby liverys and there is concern about the safety of horses and riders with any extra traffic. We would want to know that an impact assessment has

been undertaken to see where the risks could be mitigated, for example by extra traffic calming measures and speed restrictions, particularly along the Whimple Road leading past The New Inn and into Dog Village and also along Elbury Lane which many horses and riders use daily.

With reference to links to public transport, many of us are worried that, even without development in the village, the current bus service cannot cope with the volume of passengers at times of peak demand. Particularly in the evening the service can be unreliable with services frequently cancelled. Unless we see a better service, and ideally a new service also linking the village to the airport and Science Park, any development in Broadclyst will almost certainly put more cars on our struggling roads.

EDDC have previously commented that public transport provision is not within their remit when it comes to planning decisions, but the National Planning Policy framework is clear that this must be taken into account when deciding where development should happen.

Sustainable Development in Rural Areas

National Planning Policy framework statement 79 refers to sustainable development in rural areas. It suggests that housing should be located where it will enhance or maintain the vitality of rural communities, identify opportunities for villages to grow and thrive and support local services.

One of the biggest concerns of residents is that increasing the size of the village by 15% will put intolerable pressure on already struggling local services. We feel that development on this scale, far from enhancing the vitality of our community, is likely to be detrimental. Without remedial action, a swell in population will be especially difficult for the local primary and secondary schools, and the GP surgery.

We believe it's critical to engage both schools in discussion around their capacity issues and have a plan for where the extra children will go prior to approving the proposed development sites. Far from contributing to sustainability, development at such a scale will likely force more children within the Parish to travel further away to go to school. It's unclear where they might go. Broadclyst Primary is full. The nearby primary school at Westclyst also has a waiting list. There is no additional space for extra classrooms at either Broadclyst Primary or Westclyst Primary. Monkerton primary school is using the additional capacity it has to accommodate pupils from the Tithebarn development which does not have its own school.

Dr Hamish Duncan from Pinhoe and Broadclyst Surgery attended the November 21st Parish Council meeting where the EDDC draft plan was discussed. He confirmed that the local surgery has already run out of space and would not be able to accommodate any new patients without infrastructure investment. The issue for them is that they already work out of a listed building in the village and expansion at this site would be very challenging. At the nearby Tithebarn development there was a Section 106 agreement in place but it still did not help Pinhoe and Broadclyst Surgery with their capacity issues. In Councillor Henry Gent's report to Broadclyst Parish Council on Monday 7th February 2022 he states:

"One frustrating aspect of this challenge is that the S106 commitment which the developers of Tithebarn made to EDDC, to provide a building with a medical facility for rent, at Tithebarn, seems to be of zero practical use for the GP"

What assurances can we be given that the local surgery will receive the funding it needs to accommodate all the extra patients and that developers will engage appropriately with what needs to be delivered?

Flood risk

Many residents are concerned that part of site LP_Brcl_12 is in a flood risk zone (see Figure 7). During periods of very heavy rain, water saturates these fields making them particularly boggy underfoot. More recently we have noticed that the current landowner of site LP_Brcl_12 has dug drainage channels in the fields next to the hedges which were not present before. Presumably this is to make the site less waterlogged (Figure 8).

In line with sections 159 and 160 of The National Planning Policy Framework we would like to see a full flood risk impact assessment, in particular focussing on how the run-off from surface water, if this site were developed, could potentially increase flood risk of neighbouring properties and on roads leading up to Burrow Farm. These properties are already prone to flooding and residents are worried that development at this site will make their situation worse.

Achieving well-designed places

If development is permitted at LP_Brcl_29 and LP_Brcl_12 we would want full adherence to National Planning Policy statement 131, with tree lined streets, and retention of existing older trees. Both sites are surrounded and criss-crossed by many hundreds of metres of hedgerows and we would like assurance that the significant environmental harm from removing these would be mitigated. We would also want existing public footpaths across the fields at these sites to be well maintained.

Broadclyst is a beautiful village, surrounded by National Trust Land. We are concerned that development on this scale could be detrimental to the intrinsic character of the village, particularly the historic Eastern side of Broadclyst, abutting the proposed sites. This part of the village has many listed and thatched buildings. In particular, with reference to site LP_Brcl_29, any development here would have a direct impact on Lake House which is Grade 2 Listed. The land proposed is also on an elevation that could dominate the surrounding environment. If development is allowed to go ahead, we suggest it must be in keeping with the historic setting and adhere strictly to the design codes set out in The Parish Neighbourhood Plan.

We would like EDDC to establish Green Belt around any potential new development to prevent more urban creep. It's worrying for residents to see so much urban expansion around our village and we feel that if this isn't done, it misses an opportunity to allow Broadclyst to retain its special character, without which it is destined to become a suburb of either Cranbrook or Greater Exeter in the decades to come.

Habitats and Biodiversity

In line with National Planning Policy Statement 180, we believe that any residential development in the countryside often has a harmful impact on biodiversity. Residents are concerned that development at sites LP_Brcl_29 and LP_Brcl_12 would be on grade 1 agricultural land. Also on sites LP_Brcl_29 and LP_Brcl_12 there are a number of red and amber listed bird species, some specific to farmland habitat such as skylark and linnet. Bats also use the hedgerows to navigate and the dark

skies as cover from predators. Any development at these sites will be detrimental to these species by removing specific habitat, removing their navigation method and increasing the ambient light. There is a pond on site LP_Brcl_12, the loss of which would be detrimental to wildlife. We would like to see this feature maintained. One of the nearby cottages is a designated site for Great Crested Newts.

In the Cylst Vale Regional Park consultation document there was specific mention of the Winter Gardens site (LP_Brcl_12) as being an important habitat for invertebrates. We therefore would like to see a full environmental and biodiversity impact assessment, commissioned prior to development being agreed, and a proper plan for mitigation if development is allowed to go ahead. It's not possible to know what could be lost if nobody looks! There are a number of significant habitats near the proposed sites including Ashclyst Forest and Elbury Farm, the first is nationally important for butterflies and the second for rare fungi and Barn Owls. We also feel that given the numbers of bats that have been seen in the Town End area, a survey focussing on this species in particular would be vital.

Figure 1:

Recent sewage overspill being dealt with by South West Water at Winter Gardens (site LP_Brcl_12)



Figure 2: Morning rush hour outside Westclyst on the B3181



Figure 3: Single Track Lane at Town End with pupil walking towards the primary school (adjacent to site LP_Brcl_29)



Figure 4a and b: Town Hill, near Broadclyst Primary school. No footpaths on this section (a). Parents and children are walking on the road, to and from their cars parked on Town End (b).



Figure 5: Rush hour outside Clyst Vale Community College. In the distance there are pupils walking on the road due to get to the bus stop due to a lack of footpaths.



Figure 6: Flooding near Burrow Farm: vehicle attempting to drive through flood water.

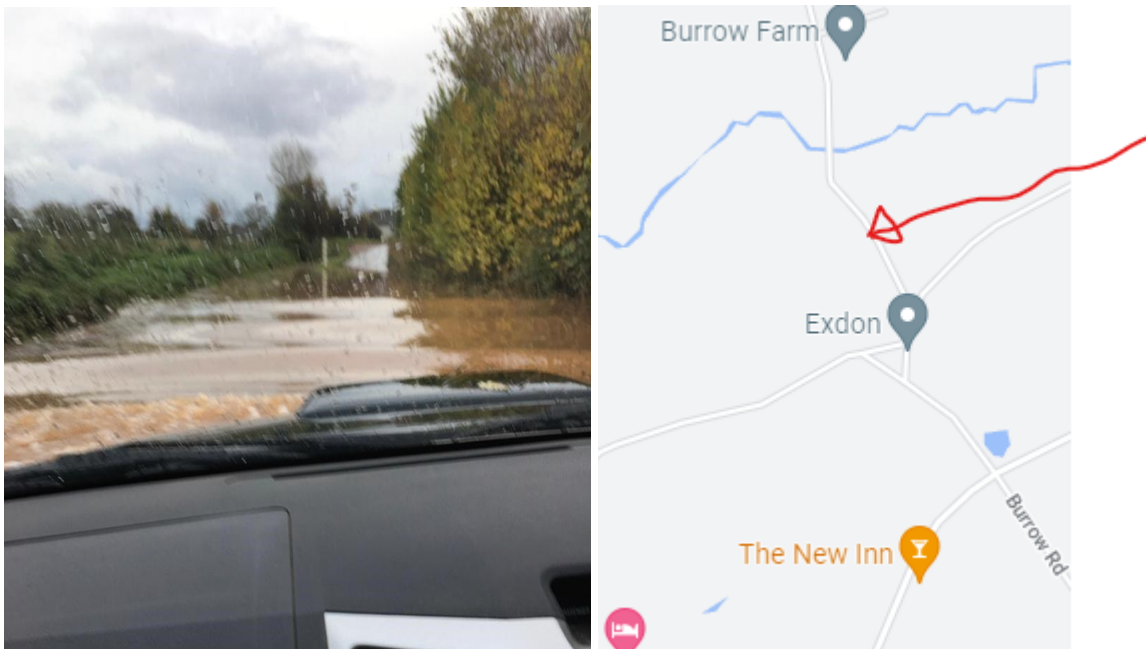


Figure 7: Environment Agency Flood Risk Map November 2022

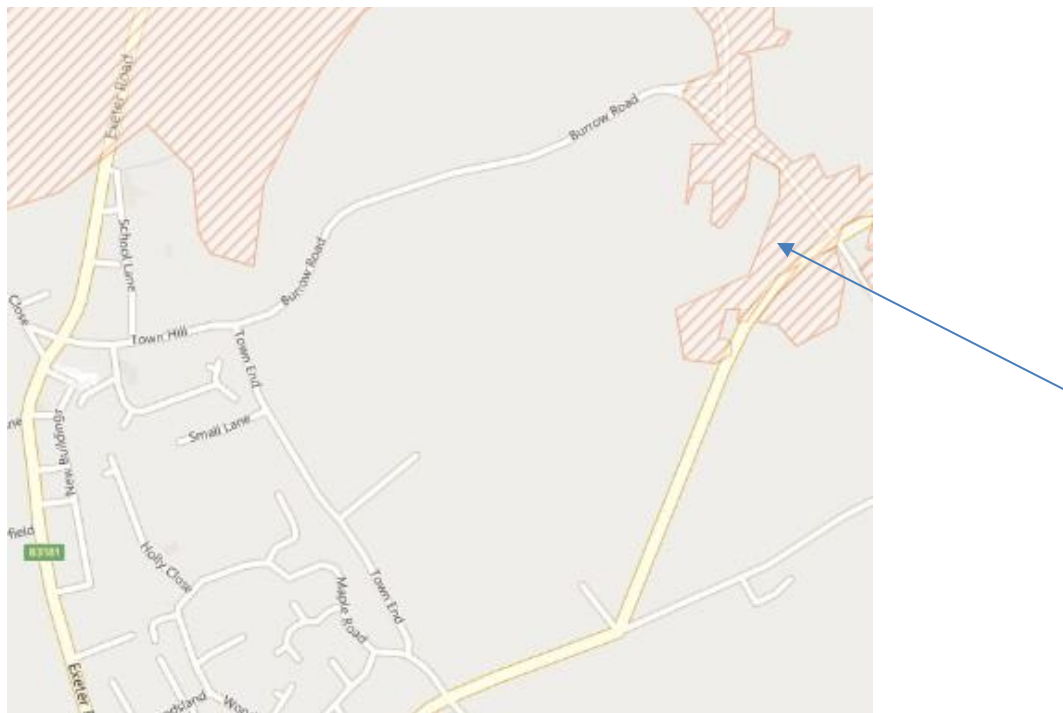


Figure 8: Drainage ditches dug in the field boundaries at site LP_Brcl_12 (Photo Nov 2022)

