

From: [REDACTED]
Sent: 14 January 2023 21:16
To: Planning Policy
Cc: Michael Rees; Matthews, David; Brady-Hooper, Rachel; Linda Renshaw
Subject: East Devon Local Plan Review - Regulation 18 Consultation
Attachments: 210113EDLPReg18BDW.pdf

Dear Sir/Madam,

Please find attached representations to the Regulation 18 Consultation Version of the emerging Local Plan, submitted on behalf of Barratt Homes (Exeter) Limited (Barratt Homes). Barratt Homes control land to the west of Lilypond Lane, Whimple.

Summarily, Barratt Homes' comments on the Regulation 18 version of the Plan are:


- Land to the west of Lilypond Lane is suitable and available for residential development. It is also a deliverable proposition. It is well located in close proximity to a range of existing services and facilities, including Whimple Railway Station, which is described as a strategic facility in the Local Plan's evidence base, providing services to a range of destinations, including the West End and Exeter.
- The development of land to the west of Lilypond Lane would deliver a number of benefits, including the provision of a new overbridge to the railway station and other off-site highway improvements, including passing bays and potentially improvements to the existing overbridge to the north-east. Other contributions could be used to fund improvements to the West of England Railway Line, including the proposed passing loops.
- It is unlikely that the Local Plan will be adopted by 2025. If work on the preparation of the Local Plan extends beyond 2025, there will be an insufficient period after the adoption of the Plan and the proposed end of the Plan period. Consequently, it is likely that the Plan period will need to be extended by two years to 2042. This will require the identification of additional land for housing.
- The Local Plan should provide further contextual information regarding the 'directions of travel,' which should be used to inform the Vision and Strategic Objectives.
- The Vision, which uses the short-term Vision contained within the Council Plan, cannot by definition, provide the necessary positive vision for the future of the area as required by Government policy.
- The Vision is silent on some of the matters referred to in the Strategic Objectives.
- Whilst Barratt Homes is generally supportive of the Plan's proposed spatial strategy, which focuses growth in the western side of the District, they consider that Whimple should be afforded a greater role in the Plan's spatial strategy. The settlement has a similar level of services and facilities as higher tier settlements and therefore it should have an uplift in its status to a Tier 3 settlement.
- The distribution of development proposes to reduce the proportion of development directed to the western side of East Devon in comparison to the 2016 Local Plan. However, the level proposed reflects delivery rates in the West End from 2013.
- The distribution of development rightfully acknowledges that the District's towns and villages have their own development needs that should be met. In the context of the need to accommodate additional housing, there are opportunities at villages in the western side of East Devon, which have strong sustainable transport opportunities, to accommodate further development. Whimple is such a location. A greater level of residential development should be directed to Whimple in future versions of the Local Plan.
- The Local Plan correctly identifies that the local need for housing is 946 dwellings per annum.
- The evidence base rightfully concludes that there is no justification to plan for a lower level of housing than the local housing need figure (946 dwellings per annum), including proposed changes to Government policy.

- Additional housing beyond the local housing need figure could be required to: (1) support the growth strategy for the western portion of the District and the wider Functional Economic Area; (2) to address affordability and the need to provide additional affordable housing; (3) to help meet the unmet needs of neighbouring authorities, including Torbay and potentially Teignbridge; and (4) noting the local housing need figure is lower than the housing provision in the 2016 Local Plan, to address the existing shortfall.
- The HELAA demonstrates that there is a theoretical supply of housing to meet a higher housing requirement.
- The flexibility allowance provided within the Plan should be increased to 10%.
- There is the potential for the double counting of windfall provision and allocations made in future neighbourhood plans could reduce windfall provision to below historic levels.
- A number of concerns are raised in relation to some of the proposed development plan policies, including: (1) mixed-use developments; (2) climate zero and net zero carbon development; (3) heat networks; (4) affordable housing; (5) housing for older people; (6) accessible and adaptable housing; (7) the market mix of housing; (8) self and custom build housing; (9) design and local distinctiveness; (10) density; (11) protecting transport sites and routes; (12) parking; (13) digital connectivity; (14) biodiversity net gain; and (15) the viability of these policy requirements.
- The HELAA assessment of land to the west of Lilypond Lane incorrectly concludes that the site is 'probably undeliverable.' The technical work prepared on behalf of Barratt Homes demonstrates that it is suitable, available and achievable for residential development.
- Future versions of the Sustainability Appraisal should: (1) assess the distribution of development proposed within the Plan; and (2) the effects of a higher housing requirement should be considered (5%, 10% and 15% above the local housing needs).

We look forward to receiving confirmation that the representations have been received and a duly made.

Kind regards,

 **MRTPI**
 Director


 website: lrmpanning.com
 twitter: @lrmpanning



DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or its substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).