

**ON BEHALF OF GREATWORTH PROPERTY MANAGERS
LTD**

**REPRESENTATIONS TO EAST DEVON LOCAL PLAN
2020 – 2040: PREFERRED OPTIONS REGULATION 18
CONSULTATION DRAFT PLAN**

LAND WEST OF CHARD ROAD (A358), AXMINSTER

January 2023

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REPORT CONTROL

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1.0 INTRODUCTION

- 1.1 On behalf of Greatworth Property Managers, Grass Roots Planning have been instructed to prepare and submit representations to the East Devon Preferred Options Consultation Draft Local Plan (Regulation 18), in respect to land west of Chard Road (A358), Axminster.
- 1.2 Land west of Chard Road is identified as a 'Preferred Option' allocation to provide a development of 150 dwellings and 0.6 hectares of employment land (allocation reference GH/ED/83). Work has been ongoing since 2020 to prepare technical evidence to support the site's allocation and to inform the masterplan, which is presented in Appendix 1. The masterplan is based on detailed technical work and is considered to be robust, and shows 125 dwellings and 0.8 hectares of employment land.
- 1.3 We previously submitted a request for pre-application advice in August 2020 and have continued to promote the site for development in the Local Plans process, the most recent of which included presenting to local members, alongside other 'Preferred Option' sites, in August 2022.
- 1.4 Given the substantive level of technical work which supports the masterplan, it is anticipated that wider public consultation will take place in February 2023. This will involve an online consultation that will include a website providing details of the development and a questionnaire for local stakeholders to answer. Surrounding properties will also be consulted via a letter drop.
- 1.5 It is then anticipated that an outline application, with all matters reserved except for access, will be submitted in Spring 2023. Accordingly, it is hoped that once the Local Plan Examination in Public begins, the Planning Inspectorate will have a pending planning application in before them, which demonstrates deliverability of the site.
- 1.6 We have reviewed the draft Local Plan and the technical evidence base associated with the emerging plan and have a number of minor comments to make on various policies throughout the document. Our representations also include an update to the technical work and revised masterplan for land west of Chard Road, Axminster.

2.0 HOUSING NEED

- 2.1 The current East Devon Local Plan proposed 17,100 dwellings over the plan period of 2013-2031 (equating to 950 dwellings per annum). Since the East Devon Local Plan was adopted, the standard method has been implemented in national policy which results in a local housing need of 18,920 dwellings over a 20-year period (946 dwellings per annum) in the East Devon area.
- 2.2 Policy 3 of the draft Local Plan states in strand 1 that ‘at least’ 18,920 dwellings will be delivered, with provision made for a headroom of approximately 10% to provide housing supply flexibility, which equates to provision of 20,800 dwellings. We agree with this approach in principle which complies with the NPPF and is a positive and pragmatic response to housing delivery.
- 2.3 However, Policy 2 – Housing Distribution sets out clearly within the accompanying table to the policy that 18,167 dwellings (908 dwellings) will be delivered over the new plan period – with additional windfalls totalling 2,335 dwellings (117 per annum), giving a total of 20,502 dwellings. Therefore, whilst this exceeds the standard method requirement, it does not meet the 10% headroom to ensure flexibility, choice and competition in the market required by the NPPF and falls short of the Policy 3 figure by 465 dwellings.
- 2.4 Paragraph 3.17 of the draft Local Plan then goes onto state that:

*‘The policy requirement for provision of at least 18,920 dwellings in the district in the plan period is justified by evidence of local housing need based on the Standard Method, using the latest ONS statistics. To be sufficiently flexible and provide ‘headroom’, forecast supply in East Devon should be 10% above that figure. That equates to about 20,800 dwellings. At this time, **we forecast that there is potential to deliver approximately 20,441 dwellings** in the plan period from the supply categories we count towards meeting the requirement plus headroom. **This includes the potential sites being considered in policies 8, 17, and 19 – 26 in this draft plan.** The forecast potential supply meets the minimum housing requirement of 18,920 dwellings and would provide about 8% ‘head room’.*’

- 2.5 The figures presented in paragraph 3.17 of the emerging plan are based on Table 1 of the supporting evidence paper ‘Housing Need, Requirement and Supply’ – an extract of this table is shown below.

TABLE 1 Forecast housing supply in the plan period by housing supply category

Housing supply category	Dwellings (approximate) Forecast delivery 01/04/2020 to 31/03/2040	Percentage of supply identified
Net completions 01/04/2020 to 31/03/2022*	1,906	9.3
Net commitments at 31/03/2022*	4,389	21.5
Cranbrook DPD Expansion Area allocations	4,170	20.4
New town (delivery by 2040)	2,500	12.2
Urban extension north of Topsham	580	2.8
Tier 1 & 2 - Preferred sites	1,712	8.4
Tier 1 & 2 - 2 nd Choice sites	1,515	7.4
Tier 3 & 4 - Preferred sites	993	4.9
Tier 3 & 4 - 2 nd Choice sites	341	1.7
Forecast Windfalls allowance*	2,335	11.4
DISTRICT TOTAL	20,441	100

Figure 1. Extract of Housing Need, Supply and Requirement Interim Paper

- 2.6 We note paragraph 6.7 of the Housing Need, Supply and Requirement Paper states *‘the reason for the small differences in completions and commitments in Table 1 compared to Table 2 is because Table 1 uses net supply figures (i.e. demolitions and other losses have been taken into account) whereas Table 2 (from the Strategic Policy in the draft plan) uses gross figures’*.
- 2.7 We would suggest in any future iteration of the Local Plan, net figures are used, because gross figures artificially inflate the level of supply that will be achieved and would fail to meet the requirements of paragraph 11b of the NPPF which states that *‘strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses...’* It would also fail to meet paragraph 35 of the NPPF which requires plans to be positively prepared.
- 2.8 Based on the evidence in the supporting interim paper on housing need, this suggests that all 2nd choice sites listed in Policy 2 of the Draft Local Plan need to be allocated as well as including an allowance for windfalls. Given that this does not meet the headroom figure of 10%, we suggest that additional land is required to ensure that choice and flexibility in the supply of housing can be made in East Devon. Alternatively, existing preferred options could have their allocated numbers increased where this is realistic.

Cross-Boundary Working

- 2.9 Although East Devon District Council have withdrawn from the wider Greater Exeter Strategic Plan (GESP), paragraph 2.10 of the East Devon Housing Need & Supply Requirement Interim Paper states *‘nevertheless, there are times when strategic cross-boundary matters are*

relevant for plan-making. These can include the issues within the Housing Market Area and the Functional Economic Market Area, to which national guidance in PPGs relates. The Greater Exeter HMA is the same area as the Greater Exeter FEMA.'

- 2.10 We agree with the above statement and are pleased to see EDDC considering adjacent authorities' housing requirements. However, whilst we acknowledge the cross-boundary working taking place, having had a brief review of Exeter City Council's Local Plan, we query the extent of land available to deliver homes in the City, the statements made in the urban capacity assessments, and whether this is realistic. It is our view that EDDC will need to consider an uplift in housing numbers to accommodate some of Exeter's need, or at the very least have a contingency in place to react if that becomes clearer over time – i.e. potentially identify reserve sites to deal with such an outcome.

Economic Growth

- 2.11 Work is still being undertaken on the Economic Development Needs Assessment (EDNA) and at the time of preparing the Housing Need, Supply and Requirement Paper in November 2022, this assessment had still not been provided.
- 2.12 As such, the Council is not yet clear on whether the results of this assessment will necessitate an increase in housing need, due to the number of economically active persons residing in East Devon during the plan period. Paragraph 4.10 goes on specifically to state *'The EDNA results will need to be integrated with the LHNA evidence at a later date. This will assess whether there is evidence relating to economic growth and the ability to house the work force to support the forecast number of jobs that would justify a Local Housing Need figure higher than the scale of housing need identified through the Standard Method.'*
- 2.13 Accordingly, we suggest this work is finalised as soon as possible to feed into the overall assessment of housing need. Without this work and the conclusions it will reach, we struggle to see how the plan can progress any further than this stage given this could have implications for the level of both housing and employment allocations going forwards.

3.0 SPATIAL STRATEGY

- 3.1 We have reviewed the proposed spatial strategy for development and agree with the general principles that it sets out, namely that larger scale development should be directed towards the larger towns first, which have a greater range of facilities. Lower levels of development should then be focused on smaller settlements, as the strategy in the Local Plan sets out:

'New development will be directed towards the most sustainable locations in East Devon, consistent with spatial strategy to:

- *Focus new development on the western side of the district, including a new town and other major strategic developments close to Exeter*
- *Promote significant development at the Principal Centre of Exmouth and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton and Sidmouth to serve their own needs and that of the wider surrounding areas*
- *Support development at the Local Centres of Broadclyst, Budleigh Salterton, Colyton, Lymptstone, and Woodbury that meets local needs and those in the immediate surroundings*
- *Allow limited development to meet local needs at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.'*

- 3.2 Paragraph 3.4 of the draft Local Plan *'a key part of the spatial strategy is to outline the settlement hierarchy, grouping settlements together where they share similar characteristics and placing them in different tiers. Settlements with a higher population and a greater range of jobs, community facilities and services serving a wide area are placed at the top of the settlement hierarchy; whilst smaller settlements that have fewer jobs and facilities perform a more local, but still important, role are grouped lower down the hierarchy.'* We agree with this approach.

- 3.3 We have reviewed Topic Paper 1a – Role and Function of Settlements (RFS) in respect to Axminster and broadly agree with the evidence that underpins the spatial strategy set out in the draft Local Plan.

- 3.4 Figure 2.1 of the paper provides a list of settlements with their population estimates and age profile – within Axminster, it is estimated that 55% of the total population (3,747 out of 6,788 people) is estimated to be of working age (16 – 64). Figure 3.3 of the RFS paper confirmed that of all residents aged 16 – 74 in Axminster, 70% are considered to be economically active

(2,796 residents out of 3,978). It also confirmed that Axminster is a net importer of workers (bringing in 74 people to the area) and its employment density is therefore 1.03. Given the availability of jobs, it is logical therefore to locate housing and employment growth to this settlement to aid its self-containment and focus growth on what is clearly a sustainable and accessible location

- 3.5 This is further supported by paragraph 3.25 of The Role and Function of Settlements paper states *'in Axminster, two thirds of the working population work within East Devon, 44% of which work in Axminster itself (joint highest of the five settlements) showing the settlement is relatively self-contained... the majority (over two thirds) drive a car to work, although walking accounts for a significant proportion (44%) in the town itself'*. In our view, this shows that those who reside and work in Axminster tend to travel to work sustainably.
- 3.6 EDDC have also considered the range of other services and facilities that are available within each settlement – figure 4.1 of the RFS paper notes the difference between strategic and local facilities and the different roles that these corresponding settlements play. We are in agreement with this premise as it recognises the difference between urban and rural areas, which is compliant with paragraph 105 of the NPPF.
- 3.7 Paragraph 4.6 states *'just three settlements are home to all of the community facilities and services in the table: Exmouth, Honiton and Axminster'* – having reviewed the facilities available in Axminster, we agree with those identified by the authority, namely the train station, bus service, primary and secondary school, convenience store, post office, GP, and other community facilities within the Town, as well as employment areas. Land to the west of Chard Road lies within a suitable walking and cycling distance to all of these facilities.
- 3.8 The train station in particular is a significant benefit to Axminster which provides regular services to Exeter St David's (a major interchange station) and to London Waterloo.
- 3.9 Axminster was originally identified as a Tier 3 settlement (paragraph 3.37 of the RFS paper), however we agree with EDDC that following the evidence gathered regarding the availability of facilities within the settlement which are significant, as well as the public transport options including the train station, it should be moved up to a Tier 2 settlement within the hierarchy and is suitable for growth (paragraph 5.3 of the report).
- 3.10 Overall therefore, we are in agreement with EDDC's assessment of the suitability of Axminster for growth and its overall role in the settlement hierarchy.

4.0 DISTRICT-WIDE POLICIES

- 4.1 We have reviewed a number of policies set out within the draft Local Plan and have some comments on their suitability and wording in respect to the draft plan.

Net-Zero Carbon Development

- 4.2 We note policy 28 of the draft Local Plan states the following:

‘All new residential and commercial development will deliver net-zero carbon emissions. Developers will be required to submit a ‘carbon statement’ to demonstrate how this will be achieved, in accordance with the energy hierarchy.... Finally, there will be a requirement for major development to calculate the whole life-cycle carbon emissions, through a nationally recognised Whole Life Cycle Carbon Assessment’.

- 4.3 Whilst the above policy is laudable, recent building regulation changes coming into effect in 2023 means that all new dwellings will have significantly improved fabric efficiency, EV charging points, solar panels and/or Air Source Heat Pumps (the latter of which is due by 2025). The changes to these building regulations means that new build properties will be capable of being net zero in terms of their ongoing emissions and therefore we question the necessity of this policy which in turn will simply lead to further work being required to support a planning application to cover an issue that is more appropriately controlled via building regulations.
- 4.4 With respect to the requirement for a ‘Whole Life Cycle Carbon Assessment’ on major developments, the policy wording is unclear as to whether it is expected for this assessment to reflect net-zero carbon emissions in terms of the build. We would suggest that if this is the case, there needs to be clearer wording in the policy to reflect this and a transition period set out for all new-build development to adhere to. This allows time for developers to consider new technologies and building methods to order to achieve net zero build emissions, which will be a significant step, whilst also ensuring that homes are delivered to meet housing need in the interim.
- 4.5 Finally, we note that no viability testing has been undertaken to support this policy which gives cause for concern as to whether its application will lead to sites being unviable. As such, we suggest this work is urgently undertaken to support the Local Plan to ensure that sites are deliverable and the policy is justified, in accordance with NPPF paragraph 35.

Affordable Housing

- 4.6 We note that under Policy 40, it is anticipated that 35% affordable housing will be required across all sites outside of the 'new town' allocation. Whilst we do not object to the level of AH provision required, we urge the Council to undertake viability testing as soon as possible to ensure that this will not adversely impact upon the deliverability of sites.

Accessible & Adaptable Housing

- 4.7 Policy 42 sets out that 100% of all new dwellings should meet building regulation M4(2) requirements. Whilst we agree that a proportion of new builds should meet this requirement, we have concerns in respect to the size of properties that this would produce and delivering a mix of homes on site, how this will affect density requirements, and the impact on viability. It may not be possible, for example, to achieve 100% M4(2) due to the topography of a site and engineering levels and this needs to be considered in more detail from a design and build perspective. In the very minimum, flexibility needs to be built into the policy that allows developers to demonstrate in some cases why this level of M4(2) may not be achievable.
- 4.8 Consideration also needs to be given to viability and how this will impact the deliverability of sites across EDDC.

Market Housing Mix

- 4.9 We are concerned that there is insufficient flexibility set out in Policy 43 in respect to open market mix. Whilst the LHNA is up-to-date currently, the plan could be in effect for 20 years and market conditions could change significantly during this period. Whilst we note strand 5 of the policy sets out that evidence can be provided to justify a different open market mix, the wording of the policy states that this will only be accepted in 'exceptional' circumstances. We consider that this does not provide sufficient flexibility as required by the NPPF.

Self-Build and Custom Build Housing

- 4.10 Policy 44 sets out the requirement for self-build and custom housebuilding on major development sites. However, the policy wording needs clarity as currently it is not clear whether the 5% requirement relates to the overall numbers on site or just the market housing element of the scheme. We would suggest that the policy is worded to make clear that this reflects 5% of market housing only.
- 4.11 We also have significant concerns with part i) of Policy 44 which requires self or custom builders to have completed their development plot within 3 years. We do not see how this

can be reasonably enforced or conditioned, and in light of unforeseen market circumstances (such as COVID-19), we do not consider that this is reasonable. Given that self-builders are unlikely to be experienced in housebuilding, a 3-year limit is a short timeframe for completion and greater consideration should be given to the wording of this policy.

5.0 LAND WEST OF CHARD ROAD, AXMINSTER

- 5.1 As set out in the introduction of this statement, land west of Chard Road, Axminster is allocated in the emerging Local Plan for 150 dwellings and 0.6 hectares of employment land (Ref: GH/ED/83).
- 5.2 Technical work has been ongoing at the site since 2020 which has informed a masterplan for the scheme which is provided at Appendix 1.
- 5.3 We sought pre-application advice from the council in August 2020, and a response was received in November 2020, which identified a series of points that needed further investigation in relation to some of the technical work undertaken, but raised no fundamental technical objection to the site's development to accommodate housing.
- 5.4 On behalf of Greatworth Property Managers, we prepared representations to the Issues and Options Consultation in March 2021, which set out the work undertaken to date on the proposals, which presented a masterplan at the time that showed circa 150 dwellings, access, drainage, landscaping, public open space and ancillary works.
- 5.5 The applicant's agents, alongside others, were then invited to present to local members as a 'Preferred Option' site, where Councillors were able to ask questions. Grass Roots Planning presented the site on the 9th August 2022 and a number of points of clarification were sought. This included queries regarding the lack of employment land proposed on the site.
- 5.6 Since this time, the applicants have been refining the proposals and undertaking additional technical work. This has primarily included adjusting the masterplan to incorporate the required employment land – this now shows 0.8 hectares of employment use. This employment land should be defined as Class E usage to ensure that future occupiers are compatible in a predominantly residential context.
- 5.7 As a result, this has reduced the number of dwellings to circa 120 overall, based on an average density of 35 dwellings per hectare. Given the edge of settlement location and constraints of the site, as well as adjacent development which is of the same density, we consider that this is an appropriate figure for the site. As such, unless the Council is willing to accept a higher density on the site (which should be confirmed in policy wording), the emerging policy should be revised to 120 dwellings, 0.8 hectares of employment land (Class E) and green space.

- 5.8 In light of the significant work undertaken on the site, it is anticipated that public consultation will take place in February 2023, with a view to submitting an outline application in Spring 2023.
- 5.9 With respect to technical work undertaken on the site, please refer to previous representations submitted in March 2021 to the Issues and Options Consultation – we would be happy to provide officers with a copy of this if not available.

6.0 CONCLUSIONS

- 6.1 In conclusion, we consider that the Local Plan is making good progress and the evidence base produced to date underpins a suitable strategy for development.
- 6.2 The key issues that we respectfully request the authority to consider are the following:
- Whether the outcome of the Economic Needs Growth Assessment will necessitate an increase to housing numbers;
 - That the authority ensures that a 10% headroom is achieved through the allocation of sites or an increase in numbers and/or density on currently proposed allocations;
 - How proposed policies will affect the viability of schemes going forward – in particular prescribed open market mix, M4(2), affordable housing and net-zero carbon requirements; and
 - Clarity on self-build provision and the % required on schemes.
- 6.3 For the reasons set out, we agree that Axminster is a highly sustainable option for growth, given the availability of public transport in the area including a railway station and bus services, as well as the multitude of everyday facilities and services which can be strengthened through increased footfall from the provision of additional housing; and as such, we consider that this strategy aligns with the NPPF in promoting growth in areas where there are suitable transport links.
- 6.4 Lastly, we consider that land west of Chard Road, Axminster is a suitable option for growth for circa 120 dwellings and Class E employment land, given its limited constraints. We have provided the Council with previous technical work undertaken at the site which demonstrates the deliverability of the proposed development, and this is continuing to be refined in support of an outline application due to be submitted in Spring 2023.
- 6.5 As such, we look forward to further discussions with the Council about the allocation of this land and seeing the next iteration of the plan which aligns the policy wording to our current masterplan.

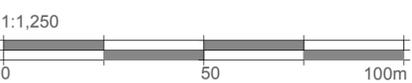
Appendix 1 – Emerging Masterplan

Concept Masterplan

1. Flexible access design could accommodate roundabout or priority junction.
2. Existing football club access incorporated into the proposed road network.
3. A well-connected and accessible development through maximising connections to existing national cycle route and footpath network.
4. Green approach into Axminster has been retained and the development is visually well contained by existing proposed hedge and tree planting.
5. Attenuation features provided in the low part of the site, outside of the flood plain and could be combined with ecological betterment.
6. New play area located within a central green corridor running across the development. Open spaces also located to the north of the site, around the national cycle route.
7. Landmark buildings positioned at key vistas to improve the sense of place and distinctiveness.
8. New flood lit mini pitch and ballstop netting.
9. Around 3.42 ha of developable land, approximately 120 homes @ 35dph, with a mix of sizes and tenures.
10. 0.8 ha of employment land.



Site boundary	Proposed pedestrian / cycle route	Public Open Space	Proposed mini football pitch
Potential all modes access and land take for roundabout	Residential streets	Existing hedges	Attenuation feature
Existing pedestrian access	Private drives	Existing trees / planting	Swale
Axminster Town Football Club access	Residential development blocks and frontage	Proposed hedgerows	Phosphate treatment plant + wetland
National Cycle Route 33	Employment land	Proposed trees	Pill Box retained
Existing pedestrian route	Key buildings	Proposed ecological corridor	



client:
Greatworth Property Managers Ltd

project:
Chard Road, Axminster

drawing title:
Concept Masterplan

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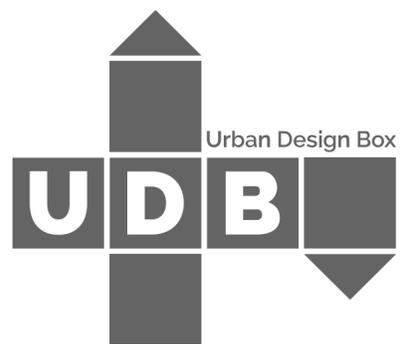
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