

From: Neil Mantell [REDACTED]
Sent: 14 January 2023 21:41
To: Planning Policy
Cc: Paul Duddridge; Richard White; Nathan Edwards; Linda Renshaw; Michael Rees
Subject: East Devon Local Plan Review - Regulation 18 Consultation

Categories: Reg.18 consultation

Dear Sir/Madam,

Please find below a link to representations to the East Devon Local Plan Regulation 18 version of the Local Plan, made on behalf of the Cherwell Group, who control land at Axehayes Farm.

[East Devon Local Plan - Reg 18 Jan 2023](#)

The site is proposed for allocation as part of the proposed new town. It follows that the Cherwell Group are generally supportive of the Regulation 18 version of the Plan.

Notwithstanding the above, summarily, they have the following comments regarding the consultation version of the Plan:

- 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.
- 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.
- The Cherwell Group are supportive of the Plan's proposed spatial strategy, which focuses growth in the western side of the District. This has been found to be the most sustainable strategy for accommodating development in East Devon in successive Local Plans.
- 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.
- 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.
- The delivery anticipated from the new town is achievable over the Plan period, but would require multiple development nodes.
- There is no evidence to suggest that the quantum of Gypsy and Traveller pitches at the proposed new town is required. Their location should be carefully considered.

- Whilst the Cherwell Group is supportive of employment land provision being provided at the new town, the quantum proposed has not been justified.
- The town centre should be phased to after the Plan period. Local/neighbourhood centres should meet the needs of the settlement's residents in the initial phases.
- The new town will require social, community and education facilities.
- Land at Axehayes Farm, which is proposed to be allocated as part of the proposed new town is suitable and available and development could be achieved on the site.
- The Local Planning Authority needs to consider the most appropriate planning vehicle to bring forward the proposed new town and to consider how its supporting infrastructure will be funded. Viability will be a key consideration.
- 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) town centres; (10) design and local distinctiveness; (11) density; (12) parking; (13) digital connectivity; (14) biodiversity net gain; and (15) the viability of these policy requirements.
- A number of concerns are raised about the scoring of Options 1 and 3 in the 'East Devon – Options Appraisal for a potential New Settlement' Report. The revised assessment work undertaken by the Cherwell Group demonstrates that of the options assessed, Option 1 is the most appropriate location for the second new town and by a more considerable margin.
- A fourth option should be considered by the Local Planning Authority, which includes land to the north and south of the A3052.
- The HELAA assessment of land at Axehayes Farm is overly negative, particularly in respect of heritage and highways impacts.
- Future versions of the Sustainability Appraisal should: (1) assess the distribution of development proposed within the Plan; (2) the effects of a higher housing requirement should be considered (5%, 10% and 15% above the local housing needs); and (3) a fourth option for the proposed new town should be assessed, which should include land to the north and south of the A3052.

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

Kind regards,

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Director

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