

Our Ref: JG

Planning Policy
East Devon District Council
Via Commonplace

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LP Reg 18 Land south west of Woolbrook Road (Sidm_01)

Please consider this response on behalf of Persimmon Homes South West, to the East Devon Local Plan (LP) (2020-2040) Regulation 18 consultation (hereafter referred to as 'The Plan'). This response is to be read in conjunction with previous representation that the Company has submitted regarding the site known as 'Land south west of Woolbrook Road' (hereafter referred to as 'The Site') – see Appendix 1. This is a direct response to the preferred site allocation Sidm_01 and a separate representation has been submitted on behalf of the Company which comments on other aspects of The Plan.

The context for the allocation deserves to be highlighted. It is undisputed that the Country is experiencing a deep-seated housing needs crisis which, in particular, affects the lives of people who cannot afford to buy a home today; a key problem for many potential homeowners today.

The inclusion of The Site within the draft LP is worded as follows:

'Land south west of Woolbrook Road (Sidm_01) – This land to the north west of Sidmouth, is proposed for 127 new homes and 0.51 hectare of employment'

Overall, the Company fully supports the inclusion of this proposed allocation within the Regulation 18 version of the Local Plan: it provides a logical rounding off to the settlement edge, is deliverable and provides an opportunity to meet the housing needs of Sidmouth and East Devon. There are however elements within the Plan which will influence how the site is designed and delivered and we recommend some minor modifications to assist the sites deliverability.

The Site

Land off Woolbrook Road measures approximately 17.5 gross acres and is situated to the north west of Sidmouth. The Site is bound by established hedgerows with a farmers gate fronting directly onto Woolbrook Road from which access will be taken. The A3052 is located in close proximity to the Site which ensures good connectivity to the wider East Devon District. A number of bus stops are located within short walking distance along Woolbrook Road, with frequent services to Sidmouth Fore Street, Exeter, Honiton and Exmouth. In addition to good access to public transport, the Site is within a 15 minute walk of Waitrose, Lidl, Sidmouth Garden Centre, a pharmacy, a public house, a church as well as a primary and secondary school – it is in a highly sustainable location for new housing.

The Site demonstrates the qualities identified within the characteristics of a '20-minute neighbourhood' idealism, which provides the Authority and the Company a real opportunity to deliver a scheme which meets the climate and sustainability ambitions of the Plan.

The field is currently in agricultural use. Persimmon Homes owns the freehold of the site and therefore it is immediately available for development and capable of implementation within 12 months of approval being granted. In other words, the site will make a valuable contribution to the housing need within the District. Fundamentally, today's house prices and the inertia in fresh sites being delivered for development means that much of the local population no longer have the opportunity to live in a decent home which they can afford, and where they want to live. Hence the delivery of this site is essential in contributing toward meeting the District's housing target.

5. Strategic Policy – Mixed use developments incorporating, employment and community facilities

This policy seeks to apply a metric which requires employment on development sites for 100 or more homes. The Company supports a variety of land uses to meet the spatial needs of East Devon, however the policy as worded would result in the provision of employment at inappropriate locations, which would ultimately lead to vacant buildings and/or unplanned conversions.

Land off Woolbrook Road has been identified for 127 new homes and therefore the employment requirement is triggered. The additional 0.11ha of employment land is calculated on a pro rata basis which also seems to include self/custom build provision. It is not clear what the vision is regarding 'employment' land as logically it needs to meet a localised need. However the policy does not factor this in. For instance, clarity is required on whether this includes home working.

In our view, the Site would not provide a logical location for employment as there are sustainable and logical existing alternatives within the settlement. Furthermore, paragraph 6.53 of the Local Plan acknowledges the proposed strategy, in the context of the made Sid Valley Neighbourhood Plan, the clear emphasis on retaining existing employment sites and supporting the town centre. Arguably, this is contrary to Sidm_01, as worded.

A blanket employment policy should not be utilised, and further consideration should be made on a localised basis, to meet settlement needs.

43. Policy – Market housing mix

This policy requires clarity. It suggests that a scheme put forward needs to be informed by an updated local needs assessment for the area, whilst also referring to the East Devon Local Housing Needs Assessment (EDLHNA) 2022 which provides a spatial overview for the entire District. The East Devon Local Housing Needs Assessment sets the overarching requirement of any mix put forward and will only remain relevant for a short period of time rather than the duration of the LP period. Whilst reference should be made to the EDLHNA, the table should not be listed and 'set in stone' within the policy to allow the necessary flexibility to respond to changes in housing need.

Any forthcoming scheme at Sidm_01 will include a mix that reflects local need and market conditions.

44. Policy – Self Build and Custom Build Housing

Previous representations submitted to support Sidm_01 has demonstrated that the site has capacity for approximately 150 homes while the current draft wording describes a capacity of 127 new homes and 0.51ha of employment. The Company is supportive of providing a percentage of Self or Custom Build plots, however, the number provided should be calculated at 5% of 127 homes. Therefore the site would deliver 127 new homes and 6 self/custom plots, rather than 121 homes and 6 self/custom plots.

The Company cannot accept the following wording: '*Be offered for sale with no legal or physical restrictions that would prevent immediate purchase and development*'. It is impossible to commit to such wording at an early stage due to factors which may impact the implementation of the development including fundamental health and safety implications during construction.

87. Policy – Biodiversity Net Gain

Whilst the Company would always look to achieve a Biodiversity Net Gain (BNG), and supports the ambition of this policy, the BNG is often limited by the site and situation. This policy needs to be consistent with the NPPF and the Environment Act 2021.

Sidm_01 provides a good opportunity to deliver a diverse and improved habitat for biodiversity. However to stipulate a gain of at least 20% will have a significant and onerous impact on what the site may be capable of delivering. The Policy should be adjusted to provide 10% Biodiversity Net Gain in line with National Guidance.

Conclusion

Persimmon Homes strongly supports the inclusion of Sidm_01 within the Regulation 18 draft of the East Devon Local Plan (2020-2040) and requests that the above is taken into account. The Site is owned by the Company and could be delivered early in the Plan period or at a point in time where the Authority considered the draft policy to bear material weight in the planning balance.

The overall scheme can be weaved comfortably into the site's locational setting and extends the grain of the existing neighbourhood. Secondly, there will be a good balance between green space and built development. Persimmon Homes will ensure the scheme fulfils every component of the Local Plan requirements and policies – not least in the provision of the 44 affordable dwellings.

Finally, there are no impediments to the site's delivery: it is immediately available for development and capable of implementation within 12 months of approval being granted. This site offers a tangible and material contribution to delivering the Districts housing need.