

Filtered Data Export

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 10. High Quality Design

**1. To which part of the High Quality Design chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** DS01

**3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.:** Vistry recognise and support the requirement within Strategic Policy DS01 for new development to be of a high-quality design and locally distinctive.

Land at Addlepool Farm offers an opportunity to deliver a high quality, self-contained, and sustainable new village, creating homes and a neighbourhood which complements the existing character and needs of the local area.

Addlepool Village is proposed to deliver a range of private and affordable homes supported by a variety of new community, recreational and ecological opportunities to create a self-contained, well-connected, lively and vibrant new neighbourhood. The Site is entirely within the control of Vistry who as promoters of the Site would also ultimately build and sell the new homes, providing greater certainty of delivery in the short to medium term.

We consider that the identification of Land at Addlepool Farm as an allocation, alongside the existing allocation of a new town, would provide the Council with greater assurance that the Plan was capable of delivering its housing requirement, particularly in the event that the new town delivery is delayed.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 10. High Quality Design

**1. To which part of the High Quality Design chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** DS01

**3. Do you consider that this part of the High Quality Design chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.:**

3.12 It is agreed that new developments should be of high-quality, locally distinctive design, following policies and national guidelines like the National Design Code. It is also agreed that developments must integrate well with the street scene, respecting the areas character, neighbouring properties and local amenities.

3.13 Criterion 13 requires new developments to include measures to secure the management of waste in accordance with the waste hierarchy during the construction and operational phases. It should be noted that, whilst developers can put measures in place to promote

certain waste management strategies, the developer cannot control the behaviour of future homeowners.

**3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

3.14 We would suggest that more effective wording of criterion 2 would be to “include measures to promote the management of waste...”. This would ensure that the policy is effective and meets the tests of soundness.



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**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** DS01

**3. Do you consider that this part of the High Quality Design chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.:**

2.86 We acknowledge Strategic Policy DS01 and the need for new development to be of high- quality design and locally distinctive.

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**Proposal:** 10. High Quality Design

**1. To which part of the High Quality Design chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** DS02

**3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.:** Vistry support Policy DS02 and agree with the need for proposals for residential development to optimise the density of the Site in a manner that conserves or enhances the character of the area and makes efficient use of land.

It is also noted that proposals for major residential development in heritage sensitive locations will be required to be supported by a design code agreed with or produced by the council as planning authority.

It is acknowledged that Clyst St George Church (Grade II) is located to the north west of the Site and there are locations within the Site which have some visibility of the church tower.

The proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. Key view corridors have been retained and are proposed as green space to ensure that the intervisibility of the church tower can be preserved.

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**1. To which part of the High Quality Design chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** DS02

**3. Do you consider that this part of the High Quality Design chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.:**

3.15 It is agreed that residential development should optimise site density while preserving the area's character and efficiently using land and that major developments must be supported by a design code supported by the Council.

3.16 It is considered that a design code for all major residential developments is excessive and that this should only be required for larger schemes. It is also noted that there is no guidance on what a design code should include, which raises the concern that officers could request an unreasonable level of detailed as part of the design code.

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**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 10. High Quality Design

**1. To which part of the High Quality Design chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** DS04

**3. Do you consider that this part of the High Quality Design chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.:**

3.18 It is agreed that new developments in East Devon should deliver high quality multi-functional Green and Blue infrastructure in accordance with Natural England's Green Infrastructure Framework. However, the 5 principles referred to by Natural England are to be met at a wider local authority level, and not for individual sites.

**3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

3.19 Testing planning applications against these specific principles is, therefore, unjustified. To ensure the policy is sound, we propose removing this requirement.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR01

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:** Vistry support Policy TR01 and agree that walking, wheeling, cycling and public transport should be the natural first choice for short local journeys, or as part of a longer journey, and therefore should be prioritised in new development.

Land at Addlepool Farm is in a sustainable location and is in close proximity to sustainable modes of transport, with good connectivity to the main district and regional centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is served via several bus services providing connections to Topsham, Woodbury, Exeter and the villages in between.

The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements, new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

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**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR01

**3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:**

2.89 We support EDDC's requirement for walking, wheeling, cycling and public transport to be the first natural choice for short local journeys.

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**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR02

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:** Vistry support Strategic Policy TR02 and the welcome support from the Council for the delivery of sites and routes that are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.

Land at Addlepool Farm does not require significant transport improvements or infrastructure to be delivered and can come forward on its own to accommodate a self-sufficient, sustainable, new village on the western edge of East Devon.

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**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

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**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR02

**3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:**

2.91 It is noted that the Council will support the delivery of sites and routes that are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development, and this will include aiding the delivery of routes including the Local Cycling and Walking Infrastructure Plans, Bus Service Improvement Plans, Local Transport Plans.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR02

**3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:** Whilst PHSW acknowledge the importance of developing infrastructure, we consider Strategic Policy TR02 to be unjustified due to lack of sufficient evidence regarding the delivery and viability of the Axminster relief road.

Within the evidence base for the Draft LP, there is no evidence of a review of the current requirement for a relief road, nor is there any information demonstrating that the relief road is viable, deliverable or justified following the history of funding issues. Until the evidence base is updated accordingly to include further information with regards to the delivery of the relief road, there is no justification for safeguarding land for the purposes of the Axminster relief road. To be considered sound, any reference to safeguarding land for the route of Axminster relief road should be removed from Policy TR02.

The proposed development at land at east Axminster is deliverable and is not reliant on the relief road to come forward.

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**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR03

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:** Vistry support Policy TR03 and agree with the proposed requirement for a transport statement or transport assessment, and subsequent travel plan if a development is likely to generate significant amounts of vehicle movements

Paragraph 117 of the NPPF (2023) which states that “all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.” Vistry therefore considers that Policy TR03 is consistent with National Policy.

A future planning application on Addlepool Farm will be supported by relevant Travel Plans and Transport Assessments.

**3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:**

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**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR03

**3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:**

3.20 The policy sets out the requirement of a transport assessment/statement, followed by a subsequent travel plan, to be submitted as part of the application for schemes that will likely generate significant amounts of vehicular movements.

3.21 This policy is supported and a future planning application relating to land off Northcote Hill will be supported by a suitable Travel Plan and Transport Assessment in accordance with this Draft LP policy.

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**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR04

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:**

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**3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:** Whilst Vistry do not object to a parking policy within EDDC's emerging LP, we question whether the proposed requirement for an average of 1.7 spaces per residential dwelling is effective, and request that greater clarity be provided within the proposed policy text.

This blanket approach offers no flexibility and does not consider site's locational context, which may justify adopting an alternative approach to parking. Car parking requirements for development schemes should be established on a case-by-case basis.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To ensure that the draft policy is sound, we strongly recommend that the reference to 1.7 spaces per residential dwelling is omitted from this policy.

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**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

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**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR04

**3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:**

3.22 We acknowledge the requirements of Policy TR04, which set parking standards for new development within the district.

3.23 Draft LP policy stipulates 1.7 car parking spaces will need to be provided per dwelling across all residential developments within East Devon. This blanket approach offers no flexibility and does not consider a site's locational context, which may justify adopting an alternative approach to parking.

3.24 Whilst we do not object to the provision of a parking policy, or the policy text which requires parking provision to be of sufficient size to accommodate vehicles and to consider access/egress, we object to the inclusion of the restrictive minimum parking standards. At present this part of the policy is not effective.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR04

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:** Policy TR04 proposes an average of 1.7 car parking spaces per dwelling (rounded up to the nearest whole number in individual applications) and 1 cycle parking space per bedroom.

PHSW Support Policy TR04 and welcome the flexibility for different provision based on public transport accessibility, the nature of occupants of dwellings or presence of locally available off-road parking provision.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR06

**3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:**

3.25 Policy TR06 sets out the requirement that all major developments have access to terrestrial or satellite superfast broadband and high-quality communications.

3.26 Policy TR06 is overly restrictive, especially for sites in smaller, isolated communities where practicality and viability are important considerations.

3.27 It is important to engage in discussions with developers to determine the practicality and feasibility of providing superfast broadband connections near the site, The consideration should depend on the size of the development and the costs associated with the additional works required.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR06

**3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:** Policy TR06 states that “planning permission for major developments, that will be used or occupied by people, will not be granted unless the scheme will have access to terrestrial or satellite superfast broadband and high-quality communications”. Whilst PHSW understand that EDDC support digital connectivity, we question whether this is justified.

The current policy wording has no flexibility for areas where superfast broadband and high-quality communications may not be available. As digital connectivity is in the control of strategic providers, and not in the control of the developer, Policy TR06 is therefore considered to be unreasonable and unjustified.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The policy text should therefore be amended to provide flexibility and request that digital connectivity be provided on site in accordance with the current building regulations.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 12. Our Outstanding Landscape

**1. To which part of the Our Outstanding Landscape chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OL01

**3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.:**

2.94 Strategic Policy OL01 states that development will only be permitted where the applicant is able to demonstrate that it will protect and enhance features and qualities that contribute to the character of East Devon's landscapes.

2.95 A number of landscape qualities are subsequently noted within the policy, including: landform and pattern of settlement; important natural and man-made features (including topography, field boundaries, trees and woodlands, areas of importance for nature conservation and rural buildings); adverse disruption of a view; and aesthetic and perceptual factors such as tranquillity, wildness and dark skies. The latter are characteristics rather than physical features of the landscape and the policy should be renamed to Landscape Features and Character to account for this.

2.96 Whilst we agree with the importance of several of the features and qualities within the policy, we do not consider that the failure to protect or enhance existing features, such as an existing tree, is of sufficient grounds to prevent development from being permitted. It is also clearly the case that development can deliver substantial quantities of new green and blue infrastructure features, including planting of different types; and enhancement of positive characteristics, both of which can provide a notable betterment to the existing landscape.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 12. Our Outstanding Landscape

**1. To which part of the Our Outstanding Landscape chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OL02

**3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.:**

2.97 Strategic Policy OL02 gives the highest level of protection to the landscape and scenic beauty of the National Landscapes (NL) within East Devon and addresses development affecting its setting or appearance.

2.98 The draft policy states that development affecting the setting or appearance of a NL will only be permitted where it avoids harm and contributes to the protection, conservation and enhancement of the special qualities, character and natural beauty of the NL.

2.99 Given that NLs account for two thirds of the district we consider the inclusion of a relevant policy that protects the landscape and scenic beauty appropriate to ensure their character and natural beauty is conserved and enhanced.

2.100 However, the current policy appears to refer to development affecting a NL's setting within the same policy clauses as development within a NL, despite being outside of the NL. Whilst the setting of NLs requires a careful and sensitive approach to development to avoid or minimise impacts on the designated landscape, National Policy is clear that the scale of development within NL should be limited, whereas development within its setting should be sensitively located and designed to avoid and minimise adverse impacts. National Policy does not require new development within

the setting of a NL to enhance the special qualities, character and natural beauty of the NL.

2.102 It is welcomed that the policy recognises that development within the setting of a NL or indeed change to the setting of an AL will not necessarily cause harm to its character and natural beauty, noting that development will only be permitted where it “avoids harm”.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

2.101 In accordance with the NPPF, land outside of a NL but within its setting should not be given the same weight and level of protection as land contained within a NL. The policy should recognise this and be consistent with national policy and thereby be segregated appropriately.

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**Proposal:** 12. Our Outstanding Landscape

**1. To which part of the Our Outstanding Landscape chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OL04

**3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.:** Whilst we agree with the need to safeguard the visual and scenic quality of the District, we consider that the policy wording should be revised to acknowledge that a change in a view does not necessarily result in an adverse effect. Development may impact a view, but this impact must be assessed. In such instances where the impact is not considered to be adverse, this should not prevent development from being delivered. It is not always possible for new development to conserve and enhance views of important features in their entirety and/or from every location within a development site from which the view may be obtained; but that also development can open new opportunities for views of important features to be experienced by the public.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The policy should be reworded to reflect these considerations.

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**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

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**1. To which part of the Our Outstanding Landscape chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OL04

**3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.:**

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**3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.:**

3.28 We agree that the visual integrity, identity and scenic quality of the District should be protected. 3.29 We also acknowledge the importance of views from publicly accessible areas and from recreational destinations. It should be acknowledged, however, that it is not always possible for new development to conserve and enhance views of important features in their entirety and/or from every location within a development site from which the view may be obtained; but that also development can open new opportunities for views of important features to be experienced by the public.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.**

**Please be as precise as possible.:** The policy should be reworded to reflect these considerations.

3.30 Furthermore, it is noted that a change in a view will not necessarily cause an adverse effect. We consider that the policy wording should recognise this and should be revised to state that development which adversely affects key views of local landmarks will not be supported.

3.31 Finally, it is noted that views from public rights of way and other publicly accessible areas are not by definition views of any quality or merit.

3.32 For the policy to be justified it should be reworded to acknowledge that the types of views referred to are only subject to the policy where they are publicly accessible.

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**Proposal:** 12. Our Outstanding Landscape

**1. To which part of the Our Outstanding Landscape chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OL05

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.:** We agree with EDDC's view on the importance of Green Wedges in that they are a 'longstanding local landscape designation that maintains open green networks between settlements'. It is agreed that Green Wedges play a vital role in preventing urban sprawl and settlement coalescence by maintaining green space separation between towns.

The importance of giving added protection against development in valued green areas is also agreed and therefore this Policy is supported.

Addlepool Farm is not located within a Green Wedge, therefore its delivery would meet this Draft LP Policy aspirations.

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**Proposal:** 12. Our Outstanding Landscape

**1. To which part of the Our Outstanding Landscape chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OL10

**3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.:** We agree with the need to protect the best and most versatile land and support the acknowledgement that the protection of this should be balanced with the overriding need for development.

It is disappointing, however, that the policy text remains unchanged from the Regulation 18 Consultation Document. Our concerns therefore remain that the policy's reference that development on the best and most versatile land (Grade 1,2 and 3a) will only be permitted in instances where land of a lower grade is unavailable is not suitable. The policy fails to provide any certainty regarding how this assessment will be undertaken and whether it is for the applicant or decision maker to review other lower grade land within the vicinity of the application site. This leads to a lead to a lack of clarity for the decision maker, applicants and local community.

It is noted that the draft allocation at North of Topsham (WS10) is located on land identified as being Grade 1 (best and most versatile). Its allocation therefore does not accord with this draft policy.

Land at Addlepool Farm does not constitute best and most versatile agricultural land and would represent a more sustainable site that would be suitable for residential development.

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**1. To which part of the Our Outstanding Landscape chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OL10

**3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.:**

3.36 This policy states that development will be limited on the best and most versatile land (Grade 1, 2 and 3a) unless allocated within another policy. The policy goes on to set out the exceptions to the above, stating that development on this land will be granted exceptionally if sufficient land of lower grades is unavailable if the benefits of the development clearly justify and outweigh the loss of high-quality agricultural land.

3.37 This policy is supported given it accords with National Policy.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 12. Our Outstanding Landscape

**1. To which part of the Our Outstanding Landscape chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OL10

**3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.:**

3.33 It is agreed that Green Wedges can play a vital role in preventing urban sprawl and settlement coalescence by maintaining green space separation between towns.

3.34 We agree with EDDC's view on the importance of Green Wedges in that they are a 'long-standing local landscape designation that maintains open green networks between settlements'. The importance of giving added protection against development in valued green areas is also agreed and therefore this Policy is supported.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB01

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:** We support Strategic Policy PB01 and agree that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated site should not be permitted subject to meeting specific criteria.

The Exe Estuary RAMSAR, SSSI and SPA are located approximately 0.5km south west of Addlepool Farm. As demonstrated on the concept masterplan, the proposals will extend public access into the Site through substantial new areas of green infrastructure to include new recreational routes. In addition, mitigation for recreational impacts that may occur to any designated sites of international importance from an increase in local residents would be secured as part of the proposals in the form of financial contributions towards improved access management and provision of substantial alternative recreation locations.

The proposed development at Addlepool Farm would comply with Strategic Policy PB01.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB01

**3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:**

2.103 We acknowledge and support the recognition that internationally and nationally important wildlife sites should be protected and note that development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless particular criteria are met.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB02

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:** Addlepool Farm is not located within a regionally or locally important wildlife sites, which is noted to include Local Nature Reserves (LNR); County Wildlife Sites (CWS); Unconfirmed Wildlife Sites (UWS); Special Verges designated for biodiversity. The proposed development will not negatively impact Regionally or Locally important wildlife sites and therefore will fully accord with the requirements of this Draft LP policy.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB03

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:** We agree that important hedgerows (as defined by the Hedgerow Regulations 1997) should be protected and their loss or degradation should only be permitted where the mitigation hierarchy has been applied and evidenced in earnest.

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:** However, we do not support EDDC's approach to applying the same protection and importance to 'species rich Devon hedges', which do not meet the criteria of 'important hedgerows'. We consider this approach is not justified.

Devon hedges are located across Devon and often along the perimeter of sites. As a result, it is often unavoidable to need to remove part of the Devon hedge to deliver a suitable site access.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The need to retain hedgerows on site, where possible, is adequately addressed under draft LP policy PB08, which acknowledges that there may be instances where the removal of hedgerows is justified and unavoidable. There is no justification to include Devon hedges within draft LP policy PB03.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB03

**3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:**

3.40 Draft LP Policy PB03 states that proposals which would result in the destruction or degradation of irreplaceable habitats will be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

3.41 It is noted that hedgerows are included within the definition of irreplaceable habitats and the Draft LP policy states that “proposals resulting in the loss and/or degradation of these hedgerows, will only be permitted where the mitigation hierarchy has been applied and evidenced in earnest”. It is noted that the Draft LP policy also states that “compensatory hedges should be species-rich, include a bank, standard trees, and be mindful of temporal

time scales to become a functional habitat in their replacement ratios. Hedgerow translocation should always be considered first, as a preferential option to hedgerow destruction followed by compensation.”

3.42 We support EDDC’s position that important hedgerows (as defined by the Hedgerow Regulations 1997) should be protected and their loss or degradation should only be permitted where the mitigation hierarchy has been applied and evidenced in earnest. However, we do not support EDDC’s approach to applying the same protection and importance to ‘species-rich Devon hedges’, which do not meet the criteria of important hedgerows.

3.43 We consider this approach is not justified given that Devon Hedges are located across Devon and are often located along the perimeter of sites. As a result, the removal of part of a Devon Hedge to deliver a suitable access point is often unavoidable.

3.44 The need to retain hedgerows on site, where possible, is adequately addressed under draft policy PB08: Trees Hedges and Woodland on Development Sites, which acknowledges that there may be instances where the removal of hedgerows is justified and unavoidable. It is therefore considered that there is no justification to include Devon Hedges within the Draft Local Plan policy PB03.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB03

**3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:**

3.38 It is acknowledged that development proposals that negatively impact Regionally or Locally important wildlife sites will only be allowed if:

- there are no alternative sites that would cause less harm;
  
- if public benefits clearly outweigh the impacts on the site and surrounding habitats;
  
- if the sites have been surveyed by a qualified botanist; and
  
  
- if avoidance, mitigation and compensation measures are proposed, ensuring habitat restoration and no degradation to wider ecological networks.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB04

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:** We support the inclusion of a policy relating to Habitats Regulations Assessment and a requirement that new development must not adversely affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017. We also agree that, where potential adverse impacts are identified, suitable avoidance, mitigation and compensation measures will be required.

It is understood that the SEDESMS is currently undergoing a review and will apply a new strategic approach to HRA mitigation. The Draft LP policy states that all residential schemes within 10km of any European sites will need to provide mitigation to offset recreational pressures. It is assumed that such mitigation will need to accord with the revised HRA mitigation that is yet to be published/completed. Until the updated HRA mitigation is completed and made available it is not possible to provide a comprehensive assessment of this Draft LP policy and understand whether it meets the tests of soundness.

The Exe Estuary RAMSAR, SSSI and SPA are located approximately 0.5km south west of Addlepool Farm. As demonstrated on the concept masterplan, the proposals will extend public access into the Site through substantial new areas of green infrastructure to include new recreational routes. In addition, mitigation for recreational impacts that may occur to any designated sites of international importance from an increase in local residents would be secured as part of the proposals in the form of financial contributions towards improved access management and provision of substantial alternative recreation locations.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB04

**3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:**

2.105 We support the requirement that new development must not adversely affect the integrity of sites protected under the Conservation of Habitats and Species Regulations 2017. We also agree that, where potential adverse impacts are identified, suitable avoidance, mitigation and compensation measures will be required.

2.106 It is understood that the South-East Devon European Sites Mitigation Strategy (SEDESMS) is currently undergoing a review and will apply a new strategic approach to HRA mitigation. It is understood that this work is still on-going and is likely to be completed in early 2025. The

draft LP policy states that all residential schemes within 10km of any European sites will need to provide mitigation to offset recreational pressures. It is assumed that such mitigation will need to accord with the revised HRA mitigation that is yet to be published/completed. Until the updated HRA mitigation is completed and made available it is not possible to provide a comprehensive assessment of this Draft LP policy and understand whether it meets the tests of soundness.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

2.107 The first part of Policy PB04 is not necessary, as it reiterates the Habitats Regulations Assessment, which are already established by legislation. The second part of the policy provides guidance for assessing impacts on certain European Sites in East Devon. This information would be better integrated into Strategic Policy PB01, rendering Policy PB04 redundant.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB05

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:** Whilst Vistry Group understand the principle of the inclusion of a policy to deliver Biodiversity Net Gain (BNG) on new development, Vistry Group strongly object and believe it is important for the required threshold to align with the mandatory requirement of 10% to ensure consistency with the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) and avoid having any undue adverse implications on the viability and overall deliverability of any sites coming forward as part of the plan-making process.

The current policy is unsound as the proposed requirements are not considered to be justified or supported by a robust evidence base. To be sound, any new policy that seeks to go beyond the mandatory BNG requirements needs to be supported by sufficient technical information and an evidence base that demonstrates that the policy is justified and effective.

The PPG states that “Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced, including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.”

In seeking to justify increasing the requirement for on-site BNG twofold, EDDC reference Evidence Document ENV-025 ‘Nature Recovery Declaration for East Devon’. This supporting document sets out the Local Nature Recovery Strategies within East Devon, and states that these have been “designed to work closely alongside other

measures in the Act. They will, for example, support delivery of mandatory Biodiversity Net Gain (BNG) and provide a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity”. This implies that the report has been prepared on the assumption that developments will be delivering the mandatory BNG (at 10%).

The statement notes the existing nature recovery plans/delivery partners (which include AONBs, Clyst Valley Regional Park, Triple Axe Initiative and EDDC Countryside) and potential new projects, strategy and policy, none of which reference or justify the inclusion of a Draft LP policy that requires 20% BNG on all development sites.

This policy is not supported by robust evidence.

Notwithstanding the lack of suitable evidence to underpin this draft Policy, we also object to the viability assumptions included within the draft LP Viability Assessment. EDDC’s Local Plan Viability Assessment (Core Submission Document CSD-004), prepared by Three Dragons attributes a financial assumption of £1,188 per dwelling (greenfield) and £321 per dwelling (brownfield) to account for delivering EDDC’s Draft LP policy of 20% BNG. Within the supporting text of this viability assumption, Three Dragons reference a MCLG report (2019) which includes sensitivity analysis regarding the achieving 20% BNG and makes assumptions on the cost implications for this on developers. The MCLG Report states that increasing the BNG to 20% would result in a 19% net additional direct cost to developers (annual). It is noted that the MCLG Report concludes by stating “our chosen policy approach, which sets out that 10% is the right level to demonstrate net gain, considers this trade-off among other issues”, which further emphasises that EDDC’s proposal to increase the BNG provision to 20% is not appropriate. We have two key concerns regarding relying upon this MCLG report to justify EDDC’s Draft LP viability assumptions:

Firstly, the MCLG document’s cost benefit change by scenario is based on 2017 prices and is therefore 8 years’ old at the time of this Regulation 19 Consultation.

Secondly, there have been significant changes to the DEFRA metric since the publication of the MCLG Report, which has altered how BNG is calculated on site. Reliance upon this report and cost benefit change is not robust or justified.

We have significant concerns regarding the need for all new developments to deliver 20% biodiversity net gain, which is not justified or underpinned by robust evidence base and therefore cannot be considered sound.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB05

**3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:**

2.108 We strongly object to EDDC's Draft Policy PB08, which requires developments to deliver 'at least' 20% BNG to be calculated using the most up to date statutory metric. This is not justified, or supported by robust evidence base, and the policy is therefore unsound.

2.109 PPG1 states that "Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented."

2.110 In seeking to justify increasing the requirement for on-site BNG twofold, EDDC reference Evidence Document ENV-025 'Nature Recovery Declaration for East Devon'. This supporting document sets out the Local Nature Recovery Strategies within East Devon, and states that these have been "designed to work closely alongside other measures in the Act. They will, for example, support delivery of mandatory Biodiversity Net Gain (BNG) and provide a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity". This implies that the report has been prepared on the assumption that developments will be delivering the mandatory BNG (at 10%).

2.111 The statement notes the existing nature recovery plans/delivery partners (which include NLs, Clyst Valley Regional Park, Triple Axe Initiative and EDDC Countryside) and potential new projects, strategy and policy, none of which reference or justify the inclusion of a Draft LP policy that requires 20% BNG on all development sites.

2.112 This policy is not supported by robust evidence.

2.113 Notwithstanding the lack of suitable evidence to underpin this draft Policy, we also object to the viability assumptions included within the draft LP Viability Assessment (Core Submission Document CSD-004), prepared by Three Dragons. The Viability Assessment makes a financial assumption of £1,188 per dwelling (greenfield) and £321 per dwelling (brownfield) to account for delivering EDDC's Draft LP policy of 20% BNG which is considered too low in terms of greenfield development regardless of whether it is delivered on site, or via credits. Within the supporting text of this viability assumption, Three Dragons reference a MCLG report (2019) which includes sensitivity analysis regarding the achieving 20% BNG and makes assumptions on the cost implications of this on developers. The MCLG Report states that increasing the BNG to 20% would result in a 19% net additional direct cost to developers (annual). It is noted that the MCLG Report concludes by stating "our chosen policy approach, which sets out that 10% is the right level to demonstrate net gain, considers this trade-off among other issues", which further emphasises that EDDC's proposal to increase the BNG provision to 20% is not appropriate. We have two key concerns regarding relying upon this MCLG report to justify EDDC's Draft LP viability assumptions:

- Firstly, the MCLG document cost benefit change by scenario is based on 2017 prices and is therefore 8 years' old at the time of this Regulation 19 Consultation.
- Secondly, there have been significant changes to the DEFRA metric since the publication of the MCLG Report, which has altered how BNG is calculated on site. Reliance upon this report and cost benefit change is not robust or justified.

2.114 In addition to the above, a requirement to deliver 20% biodiversity net gain presents challenges concerning the amount of land required to meet this requirement on site. Implementing a 20% biodiversity net gain would reduce the amount of developable land available, hindering the site's ability to efficiently deliver housing to its full housing potential.

2.115 We have significant concerns regarding the need for all new developments to deliver 20% biodiversity net gain, which is not underpinned by a robust evidence base and is not justified and, therefore, unsound.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB05

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:** Strategic Policy PB05 requires development to provide at least 20% biodiversity net gain (BNG), calculated using the most up to date statutory metric. PHSW do not believe this request is justified, nor supported by a robust evidence base.

Strategic Policy PB05 is therefore considered to be unjustified and unsound for the following reasons:

- The Nature Recovery Declaration (Doc Ref. ENV-025) which has informed the proposed policy text has been prepared on the assumption that developments will deliver the mandatory requirement of 10%;
- The 20% BNG requirement has not been referenced or justified by any of the existing nature recovery plans / delivery partners;
- The proposed costs identified within the Draft LP Viability Assessment are not appropriate and make assumptions on the cost implications for developers;

- The 20% BNG requirement would implicate the availability of land on site required to deliver homes; and

- The Draft LP Viability Assessment prepared by Three Dragons concluded that 10% is the right level to demonstrate net gain, emphasising that a 20% requirement is not justified.

The justification used for the 20% BNG requirement is based on the Nature Recovery Declaration for East Devon document which sets out the Local Nature Recovery Strategies within East Devon. This report states that the strategies are: “Designed to work closely alongside other measures in the Act. They will, for example, support delivery of mandatory Biodiversity Net Gain (BNG) and provide a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity”

This implies that the report has been prepared on the assumption that developments will be delivering the mandatory requirement for BNG at 10%.

In addition, none of the existing nature recovery partners / delivery partners noted within the Nature Recovery Declaration, strategy and policy reference or justify the inclusion of a 20% BNG requirement within the Draft LP. The current policy is therefore not considered to be supported by robust evidence.

It is noted that the Draft LP Viability Assessment prepared by Three Dragons (Doc Ref. CSD-004) makes financial assumptions of £1,188 per dwelling (greenfield) and £321 per dwelling (brownfield) to deliver EDDC’s Draft LP policy of 20% BNG. It is noted that this report confirms the 20% BNG requirement will result in a 19% net additional cost to developers on an annual basis. PHSW therefore consider the BNG requirement of 20% is not appropriate, nor justified by the Viability Assessment which concluded that 10% is the right level to demonstrate net gain.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB06

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:** Vistry support Strategic Policy PB06 and the need for new development with identified LNRS / NRN to contribute to their importance, through habitat creation appropriate to network type.

Addlepool Farm is not located within a nature recovery network, however, it will deliver targeted ecological mitigation areas and significant biodiversity improvements, alongside new habitats and improvements along the existing watercourse corridor.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB06

**3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:**

2.116 Strategic Policy PB06 proposals which result in the enhancement of existing and any subsequently defined NRNs and features that contribute to their importance, through habitat creation appropriate to network type, will be supported. The policy goes on to set out the requirements for developments located within NRNs as well as the requirements for biodiversity net gain within NRNs.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB07

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:** We support the overall principle of this policy, and the importance for new development to deliver ecological enhancements.

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:** We have significant concerns, however, regarding the lack of flexibility within the policy wording, which states the following requirements:

One integrated bird box per dwelling;

Provision of integrated bat boxes;

An integrated bat loft within all major developments;

Gaps in fences to facilitate the movement of hedgehogs; and

Provision of overhanging eaves for nesting house martins in all major developments.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Additional

flexibility should be provided within the policy wording to allow ecological enhancement features to be determined on a case-by-case basis and to be influenced by site context and ecological opportunities.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB07

**3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:**

3.45 This policy requires the provision of biodiversity features in new developments, suggesting that as a minimum the following features are required:

- One integrated bird box per dwelling;
- Provision of integrated bat boxes;
  
- An integrated bat loft within all major developments;
  
- Gaps in fences to facilitate the movement of hedgehogs; and
- Provision of overhanging eaves for nesting house martins in all major developments

3.46 The policy is supported in general, however, the current wording of the policy does not offer sufficient flexibility in terms of the location of the above-mentioned features and implies that bird boxes are to be provided on each dwelling. It is suggested that bird boxes located on existing trees may be more beneficial rather than the provision

of one integrated bird box per dwelling. The policy should be reworded to acknowledge this and additional clarity provided.

3.47 Concerns are also raised regarding Part C of the Policy due to uncertainties about enforcement and monitoring post-construction, which would complicate property sales. To address these concerns, it is recommended to strengthen the requirements of Part B by requiring one bat box per dwelling, or on an existing tree.

3.48 In regard to Part E of the policy, the requirement for overhanging eaves suitable for nesting house martins might not be appropriate from a design perspective. Additionally, bird box provisions are already covered under Part A of the policy, rendering Part E redundant.

3.49 These provisions should also only be provided where there is evidence that the relevant species is found at the site. Given that ecological appraisals are submitted alongside planning applications, these reports should be used in determining what biodiversity features should be provided for.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB08

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:** Vistry support this policy, particularly the recognition that there may be instances where tree and hedgerow removal is unavoidable. In such instances, loss of trees must be justified with mitigation and replacement planting to support biodiversity net gain.

The proposals at Addlepool Farm will seek to minimise tree and hedgerow loss, in addition to substantial new habitat creation measures, including species-rich wildflower meadows and dense woodland and thicket buffer planting. This will deliver biodiversity net gain and improve habitat diversity on the Site.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB08

**2(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not legally compliant. Please be as precise as possible.:**

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**2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

-

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:**

1.1 It is agreed that development proposals must retain healthy trees, hedges, and woodlands, especially those of ecological, historical or aesthetic value following BS 5837 standards, with detailed tree assessments and protection plans. It is also agreed that the loss of trees must be justified, with mitigation and replacement planting to support biodiversity net gain and the draft LP policy recognises that there may be instances where tree and hedgerow removal is unavoidable.

1.2 It is noted that the draft policy states “woodland, trees and hedges are to be removed they should be accurately identified, with a clear justification set out for their loss, together with details of any mitigation or replacement planting as part of an overall approach to achieving biodiversity net gain”. We support EDDC’s acknowledgement that development may require some loss of trees and hedgerows.

1.3 The policy is considered overly prescriptive, potentially resulting in future planning applications that seek to remove more existing trees due to stringent guidelines governing the relationship between buildings and trees. Instead of preserving trees, the policy encourages replacing them elsewhere on the site, which is not considered the most optimal approach.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** As drafted the Policy is extensive in its restrictions and could benefit from a shift to a more flexible, general approach.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB09

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:** Vistry object to this policy, which is not justified and therefore not sound.

The draft policy requires annual inspection reports to be prepared and issued to the LPA for a period of 5 years following completion of the planting works. It should be acknowledged that developers will often transfer the ownership of a scheme's public open space to a Management Company, whom would be responsible for the on-going maintenance of the scheme's planting. It is not justified for the developer, whom will no longer have any ownership of the land, to be held accountable for submitting annual inspection reports to the LPA, as alluded to within Part B of this draft LP policy.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** We strongly encourage this element of the policy is omitted.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB09

**3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:**

3.54 We object to this draft LP policy requirement, which requires annual inspection reports to be prepared and issued to the LPA for a period of 5 years following completion of the planting works. This is not considered to be justified. Developers will often transfer the ownership of the public open space to a Management Company, whom would be responsible for the on-going maintenance of the scheme's planting. At this point in time, the developer will no longer have any ownership of the land and therefore cannot be held accountable for submitting annual inspection reports to the LPA, as alluded to within Part B of this draft LP policy.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS01

**3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:**

We support the principle of this policy and the need for new development to deliver new and enhanced high quality open space.

The proposed development at Addlepool Farm shall deliver a variety of informal and formal public open space, which could include allotments, community orchard and formal play pitches, therefore making a positive contribution towards this policy.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS01

**3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:**

2.119 We support the principle of this policy and the need for new development to deliver new and enhanced high quality open space.

2.120 We object to the policy's suggestion that all development must consider the provision of formal sports provision including changing provision, pavilions and other supporting facilities it will generate. It should be recognised that the provision of formal sports facilities should be driven by the site's location and context and not all sites are suitable for formal sports provision.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

The Plan must acknowledge that certain sites (due to their context and topography) are not suitable locations for accommodating formal sports provision. Sporting facilities can be delivered in other, informal ways, including the provision of outside trim trail equipment, circular walking routes, which can deliver similar benefits and provide opportunities for health and well-being to all. The policy must be reworded accordingly to recognise the need to consider formal sports provision on a case-by-case basis.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS02

**3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:**

Vistry acknowledge the need for the draft LP to include a policy stipulating open space provision on new developments, however consider, at present that the policy wording does not provide sufficient flexibility and will be ineffective, hindering housing delivery.

Whilst the policy suggests that the provision and typology of public open space on sites could depart from the policy's typology breakdown, the scenarios upon which this may be acceptable is not considered to go far enough. The Council have failed to acknowledge that site topography and context should influence the open space typology that should form part of a future scheme.

Addlepool Village is centred on promoting healthy communities and is proposed to deliver significant quantum of public open space, village green, allotments, new woodland, potential for sports pitches, community orchard, and children's play areas.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS02

**3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:**

3.55 This policy sets out the requirements for the provision of open space for new developments, with the level of required open space required varying by site size. The requirements are set out below:

- Up to 20 homes – Amenity green space for informal play
  
- 21-100 homes – LAPs and amenity green space
  
- 100-300 homes – LAPs, LEAPs and amenity green space
- 300-500 homes - LAPs, LEAPs, amenity green space and other types
  
- Over 500 homes – LAP, LEAP, NEAP, informal play, amenity green space, and additional green space types.

3.56 Additional requirements for developments over 200 homes include:

- Doorstep accessible Greenspace (0.5ha within 200m) or;

- Local accessible Greenspace (2ha within 300m). For sites over 300 homes, Neighbourhood Accessible Greenspace (10ha within 1km) is required.
- Open space will be calculated based on an average of 2.26 residents per household, with some exceptions or contributions to off-site spaces allowed.

3.57 The draft LP policy provides some flexibility for diverting from the open space requirements, in instances where: the resident population may give rise to particular types of public open space; other substantive types of open space types are present; the site is constrained by size, the most meaningful contribution is generated by providing only certain types of public open space provision.

3.58 We support the Council's recognition that a flexible approach is required, however, at present, consider that the draft LP policy does not go far enough to recognise that there are other matters that influence the open space typologies that could be delivered on a site. This includes physical constraints such as topography and site context. Officers must acknowledge that certain sites are not suitable locations for accommodating certain types of public open space, especially formal sports provision, which requires specific topography and gradients. Sporting facilities can, however, be delivered in other, informal ways, including the provision of outside trim trail equipment, circular walking routes, which can deliver similar benefits and provide opportunities for health and well-being to all.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Open Space and Sports and Recreation chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The policy must be reworded accordingly to recognise open space standards should be considered on a case-by-case basis taking account of site constraints.

3.59 It should be acknowledged that, where on-site provision is not possible, financial contributions can be made to off-set pressures on existing sports and recreational facilities.

3.60 It is also considered that additional open space requirements for developments over 200 homes are not required, given that the policy already requires provision for LAPs, LEAPs and amenity green space. The provision of additional open space, above the Fields in Trust derived standard, would not only add cost to the development but also reduce the developable area of the site to overcome deficiencies of the wider area, which aren't specific to the proposed development.

3.61 If additional open space features are required, these requirements should be brought forward in the Local Plan through specific allocations.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS03

**3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:**

We support draft LP policy OS03, which supports the provision of new open space areas, sports facilities and parks and gardens, or for the upgrading or enhancement of existing facilities provided that unacceptable adverse amenity or environmental impacts do not arise from development.

Addlepool Farm will deliver significant areas of public open space, which will include both informal and formal typologies. The proposals will provide significant public benefits to the existing residents of Clyst St George as well as the future residents of the development and would ensure safe pedestrian and cycle accessibility in accordance with this Draft LP policy.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS03

**3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:**

3.62 We support draft LP policy OS03, which supports the provision of new open space areas, sports facilities and parks and gardens or for the upgrading or enhancement of existing facilities provided that unacceptable adverse amenity or environmental impacts do not arise from development.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS04

**3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:**

Vistry support the principle of policy OS04, which states that new allotments will be granted planning permission where they are well related to settlements and will avoid adverse environmental or amenity impacts.

The concept masterplan for Addlepool Village demonstrates that the future scheme could deliver allotments, should there be an evidenced demand. The allotments would serve the residents of the new village, therefore avoiding adverse environmental impacts.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 15. Our Outstanding Historic Environment

**1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HE01

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Historic Environment chapter, please use this box to set out your comments.:** We acknowledge the requirements of draft policy HE01 and the need for new development that will affect heritage assets to take account of their significance.

In respect of Addlepool Village the proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. Key view corridors have been retained and are proposed as green space to ensure that the intervisibility of the church tower can be preserved. It is agreed that the HELAA (2022) assessment concluded that the Site will not have an unacceptable impact on heritage.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 15. Our Outstanding Historic Environment

**1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HE01

**3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Historic Environment chapter, please use this box to set out your comments.:**

2.122 We acknowledge the requirements of draft policy HE01 and the need for new development that will affect heritage assets to take account of their significance.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 15. Our Outstanding Historic Environment

**1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HE02

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Historic Environment chapter, please use this box to set out your comments.:** It is agreed that developments affecting heritage assets should enhance their significance and support conservation, contributing to local character. Vistry support this policy which would appear to adhere to National Planning Policy.

In respect of Addlepool Farm, it is acknowledged that Clyst St George Church (Grade II) is located to the northwest of the Site and there are locations within the Site which have some visibility of the church tower. The proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. Key view corridors have been retained and are proposed as green space to ensure that the intervisibility of the church tower can be preserved.

It is agreed that the HELAA (2022) assessment concluded that the Site will not have an unacceptable impact on heritage.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 15. Our Outstanding Historic Environment

**1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HE02

**3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Historic Environment chapter, please use this box to set out your comments.:**

3.64 It is agreed that developments affecting heritage assets should enhance their significance and support conservation, contributing to local character. We support this policy which would appear to adhere to National Planning Policy.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 15. Our Outstanding Historic Environment

**1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HE03

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Historic Environment chapter, please use this box to set out your comments.:** It is agreed that proposals for development within or affecting the setting of a Conservation Area must conserve or enhance its special interest, character, setting and appearance, and this would appear to accord with National Planning Policy.

As illustrated within the accompanying Vision Document, Addlepool Farm does not lie within or adjacent to a Conservation Area. The nearest is Topsham Conversation Area, approximately 1km from the Site.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 15. Our Outstanding Historic Environment

**1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HE04

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Historic Environment chapter, please use this box to set out your comments.:** It is agreed that developments must protect the Site and setting of scheduled monuments and archaeological remains. We support this policy which would appear to adhere to National Planning Policy.

A future application on Addlepool Farm would be supported by all relevant technical information relating to archaeology, including a geophysical survey, to ensure that it accords with this draft policy.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 15. Our Outstanding Historic Environment

**1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HE04

**3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Historic Environment chapter, please use this box to set out your comments.:**

3.68 It is agreed that developments must protect the site and setting of scheduled monuments and archaeological remains. We support this policy which would appear to adhere to National Planning Policy.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 15. Our Outstanding Historic Environment

**1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HE05

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Historic Environment chapter, please use this box to set out your comments.:** We support this policy which appears to adhere to National Requirements and states that developments affecting registered Historic Landscapes, Parks, and Gardens must conserve or enhance their character.

Addlepool Farm is not constrained by historic landscapes, parks or gardens and offers the opportunity to deliver a sustainable landscape-led new settlement that will deliver significant benefits to East Devon.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 15. Our Outstanding Historic Environment

**1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HE05

**3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Historic Environment chapter, please use this box to set out your comments.:**

3.70 It is agreed that developments affecting registered Historic Landscapes, Parks, and Gardens must conserve or enhance their character.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** 16. Community Facilities

**1. To which part of the Community Facilities chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph or policy number that your representation relates to.:** CF01

**3(a). If yes, and you wish to support the soundness of this part of the Community Facilities chapter, please use this box to set out your comments.:**

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**3(b). If no, please give details of why you consider this part of the Community Facilities chapter is not sound. Please be as precise as possible.:** Whilst Vistry support Draft Policy CF01 in principle and the proposed tests, Vistry believe that this policy must consider new or extended community facilities on a case-by-case basis. This is particularly with regards to new development and the additional community facilities that may be proposed as the facilities be in close proximity to build-up areas.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** 16. Community Facilities

**1. To which part of the Community Facilities chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph or policy number that your representation relates to.:** CF01

**3. Do you consider that this part of the Community Facilities chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Community Facilities chapter is not sound. Please be as precise as possible.:**

3.72 This policy states that new community facilities or extensions to existing ones will be supported, provided that they meet the following requirements:

- The facility must be within, adjacent to, or close to built up areas such as towns, villages or settlements, including new land allocations in the Local Plan.
- The facility must be accessible to local residents and within reasonable walking distance for most users. Its size and scale should align with the needs of the community it serves.
- Development should promote shared spaces and facilities that cater to a variety of activities.

3.73 This policy is supported in principle but once again must be considered on a case-by-case basis. If additional community facilities are proposed as part of a new development, this should be considered and does not necessarily require such facilities to be in close proximity to existing built-up areas, noting that the additional footfall from new development could support a new community facility.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Community Facilities chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Community Facilities chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The policy should be revised accordingly.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP01

**3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:** Vistry support the principle of the draft spatial strategy detailed within Policy SP01, which seeks to direct development towards the most sustainable locations in East Devon.

The most sustainable locations have been identified as the West End of the District, followed by the Principal Centre of Exmouth, and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton and Sidmouth. Vistry support the proposed settlement hierarchy, and its distribution of development to the most sustainable locations.

It is noted that settlements not listed within the Spatial Strategy are defined as in 'open countryside' for the purposes of the Local Plan. It should be recognised that development can contribute to increasing the sustainability of settlements through the provision of additional services and facilities. New development can also contribute to the long-term viability of settlements through the indirect spending of future occupiers, and the provision of future residents to ensure the long-term vitality of communities.

For the reasons described above, Vistry support Strategic Policy SP01 and its Spatial Strategy, which aims to meet the needs of the West End, Principal Centres, Main Centres, Local Centres, Service Villages and the wider open countryside as a whole.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. :** Our attendance is necessary to effectively discuss the points raised in these representations.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP01

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:** Strategic Policy SP01 – Spatial Strategy

2.2 Strategic Policy SP01 confirms that new development will be directed towards the most sustainable locations in East Devon, with the most sustainable location identified as the West End of the District, followed by the Principal Centre of Exmouth and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton and Sidmouth.

2.3 We support Honiton’s identification as a Main Centre, which is to accommodate significant development across the Plan period ‘to serve its own needs and that of the wider surrounding areas’. Honiton is a sustainable settlement with a range of facilities and services, a mainline railway line and well placed to accommodate new development.

2.4 We support this settlement hierarchy and agree that it accords with the key tenet of the NPPF (2023), directing housing growth to the most sustainable locations.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP01

**3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:** PHSW supports that new development should be directed towards the most sustainable locations in Devon as set out within Strategic Policy SP01 which directs new development at the West End of the District, followed by the Principal Centre of Exmouth and the Main Centres, which include Axminster.

This approach is considered to be consistent with National Policy and the Government's long-standing policy of directing growth to the most sustainable locations as detailed within the NPPF (2023).

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP02

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** While Vistry support the principles set out in Plan's spatial strategy it is considered that for the Plan to be effective:

\*The stepped trajectory should be uplifted within the first half of the Draft LP period to avoid a significant shortfall within the Draft LP up until 2031/32;

\*Additional site allocations should be included within the Draft LP in addition to those already allocated to meet the delivery of at least 20,909 homes within the plan period of 2020 – 2042, which should include land at Addlepool Farm;

\*The Council should provide compelling evidence to justify the reliance on housing delivery within the new settlement.

Strategic Policy SP02 proposes that housing provision be made for at least 20,909 dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042.

While we welcome the uplift in housing delivery in line with the standard methodology Local Housing Need (LHN) figure - to ensure the Plan is positively prepared, the full housing needs of East Devon should be met. At present the Plan only meets 80% of the communities housing needs.

Paragraph 3.12 of the Draft LP states that the proposed “new community provision of new homes will come forward under a stepped trajectory that will provide an annual average of 850 dwellings per year from 2020/21 to 2031/32 and 1,070 per year from 2032/33 to plan end at 2023/24.”

Whilst the principle of Policy SP02 is supported, Vistry strongly object to the proposed stepped trajectory approach utilised within the Draft LP due to the following reasons:

1. We consider that the use of a stepped trajectory approach does not represent effective plan-making, as it places a significant level of reliance on EDDC’s cumulative housing supply shortfall from 2029 onwards.

2. It is noted that the delivery of Cranbrook has historically been associated with supply issues. The over reliance on housing delivery from a single new settlement is therefore not justified as the Council has not provided proportionate evidence to justify this approach.

An assessment of the cumulative shortfall created by the proposed stepped housing trajectory approach has been prepared by Boyer within the table below (Table 2.1).

The table above (Table 2.1) illustrates that with use of the stepped trajectory, EDDC will have a 6-year period from 2025/26 to 2030/31 where it is anticipated that there is a housing shortfall. This shortfall is particularly significant in the years 2028/29 totalling 1,192 dwellings. Vistry consider that the shortfall and failure to meet the adopted housing requirement of 20,900 until 2031/32 is neither positively prepared nor effective.

While it is acknowledged that other local authorities have adopted a similar stepped approach, EDDC’s circumstances differ. Unlike other authorities with stepped housing trajectories, East Devon doesn’t have Green Belt constraints and is able to accommodate development through plan making.

It is considered that the draft LP must uplift its housing supply, particularly within the first half of the draft LP period.

#### AFFORDABLE RATIO IN EDDC

The December 2024 draft Housing Strategy published by EDDC confirmed that Devon Home Choice had almost 6,000 people on the waiting list for social housing, and 3,000 with a housing need at the time of publication. In addition, the Devon Housing Commission report has provided evidence to demonstrate that East Devon is amid a housing crisis.

It must be acknowledged that EDDC has faced significant issues with affordability, with recent ONS data published in 2024 confirming the affordability ratio for EDDC was 9.98. This was higher than the South West (at 9.27) and considerably higher than England (8.26).

This clearly demonstrates that the use of a stepped trajectory within the Draft LP is not justified, will exasperate an existing affordability issue within EDDC, and will not effectively address the existing housing needs.

#### OVER-SUPPLY / HEADROOM

We have concerns regarding the Plan's housing supply contingency, which amounts to only 9.8%. This is considered too low to ensure the Plan remains effective in delivering its housing requirement before 2042. This is particularly pertinent noting the Plan's reliance on a new settlement to deliver approximately 15% of the proposed housing requirement.

We consider that the Plan should provide at least a 20% headroom to ensure the consistent delivery of homes throughout the plan period. This should include the allocation of land at Addlepool Farm.

#### OVER RELIANCE ON THE NEW SETTLEMENT'S HOUSING DELIVERY

It is understood that EDDC's justification for the stepped trajectory is due to a reliance on the delivery of a new settlement (draft LP policy WS01), which, as set out above, comprises over 15% of EDDC's housing requirement.

The allocation of a new town on the edge of Exeter is not disputed and it is agreed that the Western edge of East Devon is a sustainable location for development, meeting housing need close to jobs and services at Exeter.

Whilst we do not oppose the principle of allocating land for a new settlement within the Draft LP, we do object to the delivery assumptions that have been applied; and the over-reliance on this draft allocation to deliver housing within the second half of the plan period.

The new settlement is proposed to accommodate 3,300 homes over the plan period, and is reliant on the creation of an agreed, 'whole community' masterplan, with delivery of the Site to be on an agreed phased basis.

The draft LP proposes the delivery of 3,300 homes in the new settlement, an increase of over 1,000 homes compared to the 2,500 homes projected in the previous Regulation 18 Draft LP.

However, we have not seen robust evidence published since the Regulation 18 Draft LP consultation to justify this uplift in housing delivery assumptions.

At present, we consider that the assumption that housing delivery will commence within the new settlement from 2030 is not justified and the housing trajectory (which informs SP02) is unsound.

Evidence demonstrates that developments of significant scale (including new towns) are characterised by the protracted delivery times of new homes.

A report by Colin Buchanan (2005) noted that new towns are likely to need to be delivered via a Development Plan Document (DPD), which would secure a framework within which planning applications should be prepared. Indeed, this would align with the Strategic Policy WS01 policy text, which states that a ‘whole community’ masterplan must be prepared. Such a document would need to be adopted post-Draft LP adoption, and it is noted that the Draft LP is not due to be adopted until 2026.

Indeed, the risks of bringing forward the development of a new town in the absence of such a document is already apparent in East Devon, noting the infrastructure delivery issues associated with Cranbrook.

To ensure that a future DPD is effective, it is not considered that any subsequent planning applications could be determined until the DPD is formally adopted, to ensure that any development aligns with the relevant DPD.

Several factors also influence the delivery of strategic sites, including site conditions, local market, joint working (including partnership between local authorities).

The Buchanan Report also sets out the likely timescales between first application submission and first build year. The report states:

“...given the need for pre-application discussions and the need to support strategic applications with rigorous and comprehensive information and the complexity of securing onsite and off-site improvements, including provision of infrastructure (community, social, utilities and transport) it is difficult to envisage that the time between an allocation in a local development framework and first year of build reducing.”

For site capacities of 3,000 dwellings or greater, this lag time is approximately 5.5 years.

A more recent report, produced by Nathaniel Lichfield and Partners analysed the deliverability of strategic sites. The report identified that the planning approval period increases in step with the size of the development. The report confirmed that schemes

of 2,000 dwellings or more averaged approximately 6.9 years from validation of application to the construction of first house.

The Draft LP adoption, preparation and adoption of a DPD and submission and approval of an Outline Application and subsequent Reserved Matters and Discharge of Conditions application demonstrate that it is highly unlikely that the new town could deliver 3,300 dwellings within the Draft LP period. Previous evidence would suggest that delivery is unlikely to commence until the latter end of 2030s at the earliest.

To ensure the consistent delivery of dwellings, the Draft LP should allocate additional sites, to provide a greater contingency of supply, should there be any delays with delivery of the new town.

#### HISTORIC DELIVERY ISSUES RELATING TO CRANBROOK

East Devon have previously over-relied on housing delivery within new settlements, a most notable example of this is housing delivery within Cranbrook.

The adopted Local Plan anticipated that a significant quantum of development would be delivered within the West End Strategic Allocations across the adopted Plan period, particularly within Cranbrook and the identified Cranbrook Expansion Areas. However, housing delivery within the expansion areas has not progressed at the rate envisaged, which is highlighted within the table below (Table 2.2). This illustrates the actual housing delivery rates for the West End when compared against the far more ambitious housing trajectory that was anticipated by the Council at the time Local Plan was adopted.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** It's clear that the Plan must take a more pragmatic and realistic approach to the housing delivery assumptions relied upon for new settlement to ensure that the Plan does not repeat the same delivery issues and is effective and sound.

To meet the test of soundness and ensure the Plan is effective and positively prepared additional housing allocations must be included alongside the new settlement, which would ensure the consistent delivery of homes throughout the Draft LP period. This should include the allocation of land at Addlepool Farm.

Land at Addlepool Farm offers an opportunity to deliver a high quality, self-contained, and sustainable new village, creating homes and a neighbourhood which complements the existing character and needs of the local area. The proposals will include approximately 700 homes (including both market and affordable homes), local centre, land for a 2-form entry primary school (2.4ha), allotments, sports pitches and public open space.

One of the key benefits to the scheme relates to its delivery. The Site lies entirely within a single ownership and is within the control of Vistry, the largest housebuilder in the UK, who can deliver the scheme in the short to medium term.

Vistry have the experience and resource to deliver this site in full and will not be reliant on other parties to bring forward the development. This will ensure consistent delivery of homes throughout the Draft LP period.

Vistry would welcome further discussion with the Council regarding the allocation of the Addlepool Farm site, which would help ensure the Plan can be found sound.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP02

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** Strategic Policy SP02 – Levels of future housing development

2.5 Strategic Policy SP02 states that housing provision will be made for at least 20,909 homes between 2020 and 2042. This housing requirement equates to an annual housing delivery of 950 dpa across the draft Plan period, representing 80% of East Devon's Local Housing Need (LHN) as calculated using the Standard Method (NPPF 2024). East Devon claims that this allows the local community to benefit from the NPPF transitional arrangements by building approximately 238 fewer homes each year.

2.6 Strategic Policy SP02 outlines a stepped trajectory, setting an annual target of 850 homes from 2020/21 to 2031/2032, which then increases to 1,070 homes per annum from 2032/33 to 2041/42.

2.7 We object to this policy for the following reasons:

- Reason 1 – The stepped trajectory places a significant reliance on meeting EDDC's cumulative housing supply shortfall in the second half of the plan period. This approach does not represent effective plan-making;
- Reason 2 – The Plan over-relies on housing delivery within the new settlement. Historical housing supply issues associated with the delivery of Cranbook affirm that this approach is not justified;

2.8 These reasons are discussed in further detail below.

## Reason 1 - Stepped Housing Requirement/Trajectory

2.9 We object to EDDC's strategy of adopting a stepped housing trajectory.

2.10 East Devon faces significant challenges by relying on a stepped housing trajectory.

2.11 Firstly, it is important to remember that the Plan's housing requirement does not meet the district's housing need and falls approximately 238 homes per annum short.

2.12 Secondly, by providing only 80% of housing need, it is essential that as many homes are delivered as quickly as possible. However, the Plan proposes a cumulative housing shortfall over 6 years (2025/26 – 2030/31), with a notable deficit of 1,192 homes in 2028/29. Over the

first four years of the plan period, at best, this represents the delivery of only 55% of East Devon's housing needs. This backlog is not proposed to be addressed for 7 years, until 2031/32.

2.13 While it is acknowledged that other local authorities have adopted a similar stepped approach, EDDC's circumstances differ. Unlike other authorities with stepped housing trajectories, East Devon doesn't have Green Belt constraints and is able to accommodate development through plan making.

2.14 It is considered that the draft LP must uplift its housing supply, particularly within the first half of the draft LP period.

### Affordability Ratio in EDDC

2.15 EDDC has significant affordability issues. ONS Data published in 2024 confirmed that East Devon's house price to income ratio was 9.98. This is a significant affordability ratio which means the price of an average house in East Devon costs around ten-times average earnings. This is higher than the South West (at 9.27) and considerably higher than the average for England (8.26).

2.16 EDDC published a draft Housing Strategy in December 2024, which confirmed that Devon Home Choice had, at the time of publication almost 6,000 people on its waiting list for social housing, 3,000 with a current housing need. Furthermore, the Strategy confirmed that East Devon is experiencing a significant housing crisis.

2.17 This clearly emphasises that a stepped trajectory approach is not justified and will exasperate an existing affordability issue in East Devon.

#### Reason 2 - Over reliance of housing delivery within the new settlement

2.18 It is noted that the Plan's stepped trajectory approach is due to a reliance on the delivery of Strategic Policy WS01: Development of a second new community east of Exeter.

2.19 While we do not object to the principle of allocating a new settlement, we do object to the delivery assumptions that have been applied; and the over-reliance on this draft allocation to deliver housing within the second half of the plan period.

2.20 The new settlement is proposed to accommodate 3,300 homes over the plan period, and is reliant on the creation of an agreed, 'whole community' masterplan, with delivery of the site to be on an agreed phased basis.

2.21 The draft LP proposes the delivery of 3,300 homes in the new settlement, an increase of over 1,000 homes compared to the 2,500 homes projected in the previous Regulation 18 draft LP. However, we have not seen robust evidence published since the Regulation 18 draft LP consultation to justify this uplift in housing delivery assumptions.

2.22 The draft LP relies on the new settlement to commence housing delivery in 2030 (para 4.8), with an average build out rate of 300 homes+ per annum. The proposed step change in the

Plan's housing delivery between 2028/29 and 2029/30 is evidently because of housing delivery assumptions associated with the construction of the new settlement.

2.23 We remain concerned regarding the Plan's over-reliance on the ambitious delivery assumption associated with the new settlement, given the significant infrastructure required to support the new settlement's growth. Based on our experience, the delivery of new towns is a slow and protracted process, with delays in delivery of housing common place. We would expect that the delivery of a new town of approximately 8,000 homes to be guided by the preparation of a separate Development

Plan Document (DPD). Indeed, this would align with the Strategic Policy WS01 policy text, which states that a ‘whole community’ masterplan must be prepared.

2.24 The preparation of such a masterplan could not be prepared in advance of the draft LP being adopted. It is anticipated that the earliest that the draft LP would be adopted is in 2026, therefore providing less than four years to: prepare a Development Plan Document (assuming the ‘whole community’ masterplan would be secured in this way); preparation, submission and responses relating to EIA Screening/Scoping; preparation, submission, approval of Outline Planning Applications; preparation, submission, approval of Reserved Matters Applications; and discharging of all relevant planning conditions.

2.25 In the previous Draft LP (Regulation 18), which was published in 2023, the Draft LP stated, “it is unlikely that any new homes will be completed until around 2030. On this basis, and at build out rates climbing to around 300 new homes per year, we can expect to see around 2,500 new homes built at the new town by the 2040 end date of the local plan”. At the time of the Regulation 18 Consultation, the LDS stated that the Draft LP was due to be adopted in 2025. The Draft LP has not progressed at the rate it was anticipated. The current LDS expects the Draft LP to be adopted by late 2026 (12 months later) and yet proposes to allocate in excess of 1,000 additional homes within the new settlement. The delivery assumptions associated with the new settlement are not justified and must, therefore, be revised accordingly.

2.26 It is considered that housing delivery within the new town is unlikely to commence until mid- 2030s. Consequently, to ensure the Plan remains deliverable and effective, the Council must reduce the overall housing numbers allocated to the new town within the plan period to ensure the Plan can be found sound.

#### Cranbrook New Settlement – East Devon’s Historic Delivery Issues

2.27 Historically, EDDC have over-relied upon housing delivery from new settlements.

2.28 The adopted LP identified a housing requirement of 17,100 homes within the plan period (2013-2031), of which 10,563 homes were anticipated to be delivered within the West End. This included 5,270 homes to be delivered within the West End Strategic Allocations. Strategy 2 identified 4,370 homes to be delivered via Strategic Allocations within Cranbrook within the Plan period (2013-2031), with the new settlement delivering peak build out rates of “500 homes a year”.

2.29 The following table compares the quantum of homes that were previously projected to be delivered from the West End (including the Strategic Allocations) (as set out within the adopted LP Appendix 2 Schedule of Housing Sites) against the actual delivery rates from the West End as published within the latest Annual Monitoring Report (November 2024).

2.30 The above table confirms that EDDC have consistently failed to meet their adopted LP projections for the West End. This is due to the adopted Plan's over-reliance on optimistic housing delivery assumption for Strategic Allocations during the plan period.

2.31 This underscores that EDDC's reliance on the new community to significantly contribute to the emerging LP's housing requirement is not justified; and will result in an ineffective Plan; therefore, failing to meet the tests of soundness.

2.32 The Council should prioritise meeting its housing requirement of 950dpa on a consistent, annual basis. It is, therefore, considered that the Plan's proposed stepped housing trajectory will not deliver its housing requirement, and it is not effective or positively prepared and, therefore, unsound.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP03

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** Policy SP03 does not align with National Policy and the Government's overarching objective of significantly boosting the supply of homes under paragraph 60 of the NPPF (2023) and is therefore not sound.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Greater emphasis must be placed on the fact that housing requirements for Neighbourhood Development Plan areas are considered as a minimum target and should therefore not prevent additional growth from coming forward.

Whilst Vistry therefore support the principle of Policy SP03, we are concerned and object to the current policy wording and consider that minor changes to the text are needed to ensure that the policy is consistent with National Policy.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP03

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:**

2.33 We do not object in principle to Policy SP03, however, minor text revisions are required to ensure the policy is justified and accords with National Policy.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

2.34 Greater emphasis should be placed on conveying that the figures represent a minimum housing requirement. Although wording to this effect is mentioned in the second part of the policy, reiterating it within the table would enhance clarity for readers and decision-makers.

2.35 Additionally, we have observed discrepancies between the figures in this policy and those in other policies within the Draft LP. Notably, the Honiton DNA housing requirement in Strategic Policy SP03 specifies 839 homes, while the Honiton allocations identified within Strategic Policy SD03 (Honiton and its development allocations) amount to 838 homes.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. :** Our attendance is necessary to effectively discuss the points raised in these representations.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP05

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** While we support the policy in principle, we are concerned that the proposed wording restricts and discourages Neighbourhood Plans from allocating sites outside of settlement boundaries.

Housing numbers within the Council's strategic policies and housing distribution should not represent a ceiling to growth. Should local unmet need for additional housing be identified (beyond that identified within the Draft LP), the Council should encourage growth within Neighbourhood Development Plan areas to support the delivery of homes within East Devon. Neighbourhood Plans are required to be in general conformity with the strategic policies of the development plan in force (in order to meet the basic conditions) [Neighbourhood Planning PPG Paragraph: 009 Reference ID: 41-009-20190509].

Should updated evidence be prepared in support of a future Neighbourhood Plan that suggests that there is a local unmet need for additional housing (beyond that identified within the adopted LP), the Council should not prevent additional sites from being allocated within the Neighbourhood Plan if the additional growth accords with the overarching spatial strategy for EDDC.

As currently worded, therefore, it is considered that this Strategic Policy is not sound as it is not consistent with National Policy and the Government's overarching objective of significantly boosting the supply of homes under paragraph 60 of the NPPF (2023).

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP06

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** Strategic Policy SP06 states: “In locations outside of the defined settlement boundaries development will not be permitted unless it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development”.

Vistry consider that minor amends are required for this policy to be sound. There is an element of inconsistency with Strategic Policy SP05, which appears to discourage Neighbourhood Plans from allocating sites outside of the Draft LP settlement boundaries.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** It should be acknowledged that Neighbourhood Plans can make alterations to the settlement boundaries to allow for additional housing growth where this is justified and accords with the Council’s overarching spatial strategy, therefore meeting the NDP Basic Conditions Tests.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP06

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:**

2.40 Strategic Policy SP06 states that in locations outside of the defined settlement boundaries, development will not be permitted unless it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development.

2.41 While we support this policy, we consider that there is an inconsistency with Strategic Policy SP05, which appears to discourage Neighbourhood Plans from allocating sites outside of the Draft LP settlement boundaries.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** It should be acknowledged that Neighbourhood Plans can make alterations to the settlement boundaries to allow for additional housing growth where this is justified and accords with the Council's overarching spatial strategy, therefore meeting the NDP Basic Conditions Tests.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP07

**3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:** Vistry support the principle of Strategic Policy SP07 which relates to the delivery of supporting infrastructure with new development. We understand and acknowledge the need for infrastructure on both a strategic and local level to support growth within East Devon, and that new development is a key aspect of the delivery of infrastructure.

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** We, however, disagree with the policy text that references the need for appropriate development to support the 'wider community'. We object to the inclusion of this text within the draft policy. Infrastructure to support proposed development must meet the tests set out within Regulation 122 (as amended by the 2011 and 2019 Regulations) (necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development). At present, the draft LP policy indicates that the proposed development should offer infrastructure that would improve the infrastructure needs of the wider community.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** As set out above, infrastructure must be suitable for the development to be acceptable in planning terms, there is no requirement for development to support the needs of the wider community. This element of the draft LP policy should be removed accordingly.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP07

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:**

2.42 We support the need for new development to be accompanied by appropriate infrastructure, delivered in a timely manner to support the needs of the community.

2.43 However, the draft policy requires new development proposals to be delivered alongside infrastructure that supports the needs of the “wider community.” We object to this inclusion, as it contradicts with CIL Regulation 122, which requires planning obligations to be necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

2.45 It should be noted that land off Northcote Hill is capable of meeting the requirements of policy SP07 through the delivery of a number of public benefits, including extensive areas of public open space; highway improvements to support the vehicular trips likely to arise from

the proposed development; community park; neighbourhood hub; and enhancement of walking and cycling routes.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your**

**suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

2.44 Policy SP07 needs greater clarity to reflect the tests at Regulation 122 to ensure the policy is effective and can be found sound.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**3. Do you consider that this part of the Spatial Strategy chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:**

2.36 Whilst we agree with the principle of this policy, we object to the current policy wording, which appears to restrict and discourage Neighbourhood Plans from allocating sites beyond settlement boundaries.

2.38 Should updated evidence be prepared in support of a future Neighbourhood Plan that suggests that there is a local unmet need for additional housing (beyond that identified within the adopted LP), the Council should not prevent additional sites from being allocated within the Neighbourhood Plan.

2.39 As currently worded, therefore, it is considered that this Strategic Policy is not sound as it does not align with National Policy and the Government's overarching objective of significantly boosting the supply of homes (NPPF; Paragraph 61).

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

2.37 The housing numbers within the Council's strategic policies and housing distribution should not represent a ceiling for growth. Neighbourhood Plans must be in general conformity with the strategic policies of the development plan in force (in order to meet the basic conditions).

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS01

**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:** Vistry do not dispute the allocation of a further new town on the edge of Exeter, and it is agreed that the Western edge of East Devon is a sustainable location for development, meeting housing need close to jobs and services at Exeter.

Whilst we do not contend with the strategy to include a further new town within the Draft LP, we have significant concerns as to whether such a development can deliver 3,300 dwellings within the Draft LP period and commence housing delivery by 2030 (as proposed within the Council's housing trajectory).

It is noted that the Policy WS01 states that the new community "will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis". The policy proceeds to reference the requirement for a "allocation-wide Masterplan", which will set out the affordable housing provision across the entire allocation and housing tenure and densities. By the end of the Draft Plan period, the Site will need to include a 5-hectare completed and operational town centre.

However, the Draft LP fails to confirm how the developments shall be delivered in a phased and co-ordinated manner. It is our assumption that this will be secured via a Development Plan Document (DPD).

A DPD cannot be adopted in advance of the Draft LP to which it relates and arguably, for the DPD to be effective, planning applications relating to the new town should not be submitted in advance of the DPD being adopted.

Even after the adoption of a DPD, as set out within our response to Strategic Policy SP02, there are significant lag times associated with housing delivery in large allocations.

It is not considered realistic that the new settlement could deliver housing by 2030.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** For this policy to be effective and, therefore sound, the quantum of development proposed through the new town in this Draft LP should be reduced to reflect a more justified delivery figure; and additional housing sites allocated across East Devon to ensure the housing requirement is fulfilled and the consistent delivery of homes throughout the Draft LP period.

Land at Addlepool Farm should be included as an allocation. The proposed scheme aligns with the Council's overarching principles of delivering development in accordance with the 20-minute neighbourhood concept, whereby key facilities and services are within a 20-minute distance using public transport, walking or cycling.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS01

**3. Do you consider that this part of the Development at the West End chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:**

2.46 We have significant concerns regarding the Plan's delivery assumptions for the new settlement. In particular, the effectiveness of the Plan given its over-reliance on the new settlement delivering 3,300 homes between 2030 and 2042.

2.47 This consultation document does not contain evidence to justify the delivery rates proposed for the allocation of the new settlement. It is noted that the Council intend to do a further Regulation 19 consultation later in 2025, at which time they hope to identify evidence to support the allocation's delivery rates. Given the current absence of evidence Policy WS01 is not justified and unsound.

2.48 Research undertaken by Litchfields 'Start to Finish' provides such empirical evidence for considering housing delivery in the context of preparing local plans. The research demonstrates that:

- the average timeframe for sites of 2,000+ homes from validation of a first planning application to the completion of the first dwelling is 6.6 years;
- the average lower to upper quartile range for build-out rates for sites of 2,000+ homes is 100 to 188 dpa; and
- looking ahead, the OBR's forecasted drop in housing transactions and worsening market conditions will likely lead to a reduction in build out rates over the beginning of the plan period.

2.49 It is highly unlikely that the new settlement would be started in 2030, and Policy WS01 is ineffective and unsound. We say this because prior to the preparation and

determination of any future planning application significant work is required, inter alia, to:

- Undertake masterplanning work, public consultation and community involvement. Draft Policy WS01 proposes that the new community “will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis”. The policy proceeds to reference the requirement for a “allocation-wide Masterplan”, which will set out the affordable housing provision across the entire allocation and housing tenure and densities.
  - Scope and coordinate the delivery of significant supporting infrastructure, including the construction of an operational, 5-hectare town centre.
  - It is assumed that a Development Plan Document (DPD) will need to be prepared to ensure the allocation is delivered in a coordinated manner. To prevent abortive work, it is anticipated that the DPD would not be prepared until the draft LP had been adopted. It is noted that the Cranbrook DPD was not adopted until October 2022, despite the LP having been adopted more than 6 years prior in 2016.
- 
- Planning applications would be prepared and submitted following the adoption of the DPD to ensure they can demonstrate consistency with the approved masterplan. Noting the scale of the site, it is likely that any future application would proceed in Outline and would be considered as EIA development, therefore requiring additional assessments to be undertaken as part of the application preparation process, and an associated elongated determination timescale.

2.50 On this basis, a more realistic timeframe would be:

- 2025/26 - Adoption of the Local Plan
  
- 2026/27 – Consultation and approval of “Whole New Community Masterplan”

- 2028/30 – Preparation of Development Plan Document
- 2031 - Preparation and submission of outline planning application and EIA
- 2037 - Planning Committee resolution to grant and s106 agreement signed to allow planning permission to be issued and the first completion in 2036
- 2037 – 2042 - An average build-out rate of 120 dpa from 2036 to 2042 delivering 600 homes before the end of the Plan period.

2.51 This would leave 2,700 homes short of meeting the Plan’s housing requirement.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

2.52 For this policy to be effective and therefore sound, the quantum of development proposed through the new town must be reduced to reflect a justified housing delivery figure; and additional housing sites allocated across East Devon to ensure the Plan’s housing requirement is met by 2042.

2.53 Land off Northcote Hill, Honiton (south of the railway line) should be allocated to deliver 285- 300 homes, which would ensure the development can make a meaningful contribution towards EDDC’s housing land supply in the short to medium term, allowing for any unforeseen delays in housing delivery within the new settlement. By increasing the proposed allocation on Land off Northcote Hill, Honiton (south of the railway line), this will ensure that the allocation makes the most effective use of land, in accordance with national policy and guidance.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS09

**3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:** We support draft policy WS09 and EDDC's identification of Clyst Valley Regional Park.

Land at Addlepool Farm will positively contribute to the achievement of the objectives of the CVRP and enhance linkages with the park. The delivery of Addlepool Farm will increase the number of communities that will benefit from the park, offering greater connectivity and access to a wider audience along the eastern edge of Exeter.

Vistry Group consider Land at Addlepool Farm to provide the opportunity for a sustainable new community that will strongly support the expansion of the CVRP. Development at Addlepool Farm would enable the active and healthy places criteria of the CVRP to reach its maximum potential through the Site's proximity to the expansion boundary. Addlepool Village would enhance green links with Clyst St George, providing existing and future residents with improved access to green space and public open space. Given the Site's location along the length of the proposed Clyst Valley Trail, the Walking and Cycling infrastructure of the Clyst St George would also be improved, enhancing accessibility into the CVRP and along Exmouth Road and Woodbury Road through the provision of sustainable movement.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

4. Development at the West End

**1. To which part of the Development at the West End chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS10

**3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:** Vistry object to the allocation identified as “development next to the M5 and north of Topsham”, set out within Strategic Policy WS10. The policy is not justified and is unsound.

Within EDDC’s Regulation 18 Additional Consultation, the Site was identified as being located within a Green Wedge. Vistry responded to that consultation confirming that they had significant concerns regarding the impact of the draft allocation on the purpose and functionality of the Green Wedge designation within which it was then located. It is noted that the proposals map has since inset the Site within Green Wedge designation. EDDC revised the Green Wedge designation to exclude areas covered by Strategic Policy WS10, effectively adjusting the boundaries to leave out site proposed for housing. This adjustment compromises the integrity of the original Green Wedge identification process. The inclusion of a site within a Green Wedge signifies that its development would lead to settlement coalescence. Consequently, such sites should not be deemed suitable for development and should have been assessed appropriately in the Council’s HELAA site suitability assessment.

This development of this site would introduce inappropriate built form to the area, as it is situated between Topsham and Clyst St Mary, not directly adjoining either settlement. This would result in sporadic, isolated development that contributes to settlements coalescence. Although separated by the M5, the allocation would appear as an extension to the southeast of Exeter and the nearby settlement of Newcourt.

It is noted that the Site extends across multiple land ownerships and the policy requires a masterplan prior to enabling any specific parcels of land to come forward for

development. This masterplan will also require cross-boundary working with Exeter City Council and will require the development to consider the infrastructure needs across both authority areas.

The Site's HELAA (2022) assessment also notes that the Site is located within Grade 1 agricultural land, and therefore the allocation does not comply with draft LP Policy OL10.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Vistry consider there to be suitable alternative sites outside of the existing Green Wedge and within areas of lower agricultural land quality, located on strategic network routes that require less infrastructure improvements that can deliver housing at a similar scale to Land North of Topsham without compromising the purpose and function of other policies, including Land at Addlepool Farm.

Addlepool Farm is owned by a single landowner, and is within the control of Vistry, a national housebuilder, who have the expertise and reputation to deliver a sustainable scheme that can make a meaningful contribution to EDDC's housing land supply in the short to medium term. Unlike this draft allocation at north Topsham, Addlepool Farm is not located within a Green Wedge and its development would not compromise the coalescence of settlements.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD02

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** Yes

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**

PHSW supports Strategic Policy SD02: Axminster and its development allocations, which includes land under their control.

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

While PHSW supports the allocation of land east of Lyme Road (Axmi\_22) for the delivery of 100 dwellings, to ensure the policy's soundness during examination, policy requirement to safeguard land for the relief road should be removed. We says this because:

- The Policy's requirement for a 'possible future relief road' lacks justification due to insufficient evidence of its necessity, feasibility or viability. A review of the current Regulation 19 consultation evidence base documents indicates that the relief road is unlikely to be delivered in the plan period.

- By definition, the term 'possible,' refers to something uncertain or improbable. Since the inclusion for the relief road from the 2013-2031 adopted Local Plan (adopted in

2016), nine years have passed without its delivery. Substantial evidence reveals that the road it is not viable and therefore undeliverable.

- The previous Regulation 18 Consultation Plan (August 2022) highlighted significant viability issues with the relief road. These concerns were also noted in EDDC's Strategic Planning Committee meetings.

- For the plan to be made sound, reconsidering and removing the safeguarding of the possible future relief road is essential, allowing for the timely delivery of the Axmi\_22 allocation within the next 5 years.

Furthermore, it is important to consider the changes to the Key Diagram and Proposals Map relevant to Axminster. The Key Diagram designates Axminster as a Tier 2 settlement, marking it as a main centre planned to accommodate approximately 1,100 homes and 4ha of employment land. The online Draft LP Proposals Map identifies the Site as falling within the settlement boundary for Axminster. It also indicates a significantly reduced quantum of development on the eastern side of Axminster, with Site allocated for housing. The land to the north is allocated for both housing and employment.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The reduction in the quantum of development compromises the ability to deliver the relief road originally envisioned for Axminster. The existing evidence base does not include any reassessment of the necessity of a relief road. The evidence base, therefore, lacks any evidence to demonstrate that, given the reduction in scale and quantum of development planned in the emerging Plan, the relief road is still essential to mitigate the impacts of the development.

Emerging Policy SD02 allocates the site for:

“Land east of Lyme Road (Axmi\_22)

This site is allocated for 100 dwellings. The site layout should make provision for a suitable access road to facilitate the development of site GH/ED/80 to the north and also be built to a standard suitable for use as part of a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge.”

The current wording of emerging Policy SD01 is considered to be unjustified, and the inclusion of a requirement for the site to “be built to a standard suitable for use as part of a possible future relief road” is not suitable for the proposed scale of development currently identified for 100 homes.

There is a further reference of the ‘possible future relief road’ as part of allocation wording for land north of the site at Prestaller Farm, Beavor Lane (GH/ED/80a) which also forms apart of Strategic Policy SD02: Axminster. Specifically, that element of draft Policy SD02 states:

“Development must incorporate a site road that is of a standard and is appropriately located so that it, and through potential future extension of the road, can form a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge.”

In both instances, there is no further justification to support the inclusion of a possible future relief road.

**4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?:** Yes

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** To ensure the further work required is undertaken to ensure the Local Plan is positively prepared, effective, justified and consistent with National Policy.



**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD03

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

2.45 It should be noted that land off Northcote Hill is capable of meeting the requirements of policy SP07 through the delivery of a number of public benefits, including extensive areas of public open space; highway improvements to support the vehicular trips likely to arise from

the proposed development; community park; neighbourhood hub; and enhancement of walking and cycling routes.

2.53 Land off Northcote Hill, Honiton (south of the railway line) should be allocated to deliver 285- 300 homes, which would ensure the development can make a meaningful contribution towards EDDC's housing land supply in the short to medium term, allowing for any unforeseen delays in housing delivery within the new settlement. By increasing the proposed allocation on Land off Northcote Hill, Honiton (south of the railway line), this will ensure that the allocation makes the most effective use of land, in accordance with national policy and guidance.

2.55 It is welcomed that land south of Northcote Hill (north and south of the railway line) is identified as two draft allocations within the draft LP. Taylor Wimpey supports the

allocations and can confirm that both sites are suitable and available for immediate development. Both sites can contribute to the Council's immediate housing land supply.

2.87 Land off Northcote Hill lies on the edge of the Blackdown Hills National Landscape Area and therefore any future proposed development should consider the Blackdown Hills AONB Design Guide for Houses and accord with the principles of the National Design Code and Building for a Healthy Life, and any other local design guidance.

2.88 As illustrated on the supporting Vision Document, land off Northcote Hill can deliver an attractive, well-designed and landscape-led scheme that responds to the site's context and location. The developable areas are carefully located along the site's existing contours, with a large eastern green buffer to frame the development from the wider countryside. The concept masterplan demonstrates how the site can accommodate 285-300 homes on land south of the railway line, which will be integrated with the existing settlement of Honiton.

2.90 In accordance with this policy, Land off Northcote Hill will prioritise sustainable modes of transport and ensure that walking and cycling is prioritised within the development's design. The scheme will deliver an attractive, landscape-led development with extensive areas of public open space, including a community park for the enjoyment of existing and future residents.

2.92 Land off Northcote Hill (north and south of the railway line) is not located within a Local Cycling and Walking Infrastructure route. As set out within the accompanying Transport Note, however, the proposed masterplan will incorporate high quality walking and cycling routes throughout the development and provide off-site pedestrian improvements, including provision of footways to ensure future residents are able to safely access the existing facilities and services within Honiton.

2.104 Land off Northcote Hill will not affect internationally and nationally important wildlife sites. The site lies outside of any Natural England 'SSSI Impact Risk Zones' relating to residential development.

2.117 Land off Northcote Hill is located outside of a nature recovery network. The proposed development will deliver a comprehensive landscape-led scheme, which will deliver a mosaic of habitats and deliver areas of ecological enhancement, contributing to the site's biodiversity net gain.

2.121 Land off Northcote Hill proposes to deliver areas of new public open space, which will be for the enjoyment of the existing and future residents of Honiton. This could include a new community park, which will offer a variety of walking routes, informal recreation and biodiversity enhancements. The various areas of informal open

space (including trim trail equipment) will contribute to the health and well-being of future residents. The proposals are landscape-led and informed by the site's context.

2.123 As demonstrated through the accompanying Heritage Note, by virtue of there being no heritage assets within proximity of the site, land off Northcote Hill is unlikely to lead to harm to the significance of any designated heritage assets in the local area. The proposed development, as shown on the accompanying concept masterplan will ensure, through the design process, that opportunities are taken to enhance the historic environment where possible.

3.17 In the case of land at Northcote Hill south of the railway line (Phase II), it is considered that the allocation does not currently optimise site density through the effective use of land. According to the draft Local Plan, allocation GH/ED/39b is able to accommodate 100 homes. However, through further investigation, the technical information submitted alongside this submission clearly demonstrates that the site can accommodate 285-300 homes.

3.21 This policy is supported and a future planning application relating to land off Northcote Hill will be supported by a suitable Travel Plan and Transport Assessment in accordance with this Draft LP policy.

3.35 Land off Northcote Hill is located outside of EDDC's defined Green Wedges. The development of these allocations would therefore accord with this draft LP policy.

3.39 Land off Northcote Hill is not located within a regionally or locally important wildlife sites, which is noted to include Local Nature Reserves (LNR); County Wildlife Sites (CWS); Unconfirmed Wildlife Sites (UWS); Special Verges designated for biodiversity. The proposed development will not negatively impact Regionally or Locally important wildlife sites and therefore will fully accord with the requirements of this Draft LP policy.

3.52 Any future application relating to Land off Northcote Hill will be accompanied by detailed tree assessments and protection plans in accordance with Draft Policy PB08.

3.63 Land off Northcote Hill offers the opportunity to deliver extensive areas of public open space, which could include a community park, that would be a significant public benefit to the existing and future residents of Honiton. The proposed development would ensure safe pedestrian and cycle accessibility in accordance with this Draft LP policy.

3.65 Land off Northcote Hill is not constrained by heritage assets and offers the opportunity to deliver a sustainable landscape-led development that will deliver significant benefits to East Devon, making a meaningful contribution to the District's housing land supply.

3.67 Land off Northcote Hill is not constrained by heritage assets and offers the opportunity to deliver a sustainable landscape-led development that will deliver significant benefits to East Devon, making a meaningful contribution to the District's housing land supply.

3.69 As set out within supporting technical notes, Land off Northcote Hill is not constrained by archaeological assets. Any future application would be supported by a suitable geophysical survey to ensure compliance with this Draft LP policy.

3.71 Land off Northcote Hill is not constrained by historic landscapes, parks or gardens and offers the opportunity to deliver a sustainable landscape-led development that will deliver significant benefits to East Devon, making a meaningful contribution to the District's housing land supply.

4.6 These representations are supported by a full suite of Technical Reports, which have informed a concept masterplan for land north and south of Northcote Hill.

4.7 The technical reports demonstrate that the site can accommodate a greater quantum of development than set out within the Draft LP. The technical reports are summarised below.

#### Landscape and Design

4.8 A Landscape Visual Assessment (LVA) was prepared by Stantec in February 2025 which provides Landscape and Visual advice for the proposed residential development at Land off Northcote Hill, Honiton. The LVA provides a series of landscape development principles with the aim of avoiding or reducing any adverse effects on the landscape as a result of the development.

4.9 The assessment states that there is potential for sensitive development at the site that responds to the surrounding landscape areas based on a number of opportunities, constraints and development principles.

#### Highways/Access

4.10 A Transport Vision Technical note has been prepared by Transport Planning Associates (TPA) and sets out the key transport related opportunities for the proposed development. The report provides an assessment of the following:

- Existing Conditions and Accessibility;

- Existing Local Travel Behaviour;
- Transport Policy and Guidance;
- Transport Vision Overview;
- Access Strategy;
- Masterplan Development and Virtual Mobility;
- Walking and Cycling Vision;
- Public Transport Vision;
- Travel Planning and Other Sustainable Transport Measures;
- Preliminary Junction Capacity Assessment; and
- Summary and Conclusion.

4.11 A technical analysis, assessing the potential impact of the development on the local highway network demonstrates that Phase 2 (GH/ED/39b) can accommodate 300 homes rather than the 100 dwelling currently allocated in the Draft Plan.

4.12 The report highlights that the site is well located in the context of the local and transport highway network and is also well connected with facilities and amenities within Honiton and the surrounding towns and cities. The site is also within walking and cycling distance of a wide range of facilities and amenities in Honiton. The site is situated within close proximity to existing public transport facilities including Honiton Railway Station and a number of bus services. The report demonstrates the possibility to encourage travel via active transport, providing the opportunity to reduce levels of car use by future residents.

4.13 In terms of access, the report concludes that the site can deliver a safe and suitable access for both vehicles and active travel.

#### Flooding and Drainage

4.14 A Flood Risk and Drainage Technical Note has been prepared by Pheonix Design, which provides an assessment of any flood risk or drainage issues that may be present on the site. The assessment concludes that the site is identified to be of low risk to flooding from all sources, and that the NPPF/PPG Sequential Test and Exemption Test are not required. The assessment goes on to state that Sustainable Drainage Systems will be used to manage any surface water from the proposed development and will ensure that the site is safe from flooding for its lifetime.

#### Ecology

4.15 An Ecological Deliverability Report has been prepared by EAD Ecology which provides an assessment of the suitability of the site for development. The report confirms that there are no overriding ecological constraints to the development of the site. It is also considered that, where constraints are identified, that measures could be provided to ensure that enhancements deliver a minimum of 10% biodiversity net gain, as per the mandatory requirement, or 20% biodiversity net gain, as set out in emerging Policy PB05. The report also confirms that the development could be carried out in accordance with the national and local (adopted and emerging) biodiversity planning policies.

4.16 The report also sets out the scope for any further ecological work that will be submitted alongside a planning application. Several habitat surveys (set out within the TN), as well as an Ecological Impact Assessment would be required in order to ensure

that all proposed habitats and species are protected or enhanced as part of the scheme.

4.17 An Ecological Constraints and Opportunities Plan has also been prepared by EAD Ecology and provides an overview of the site's ecological constraints and opportunities. The plan outlines the key ecological constraints for the site which include the hedgerows, scattered broadleaved trees and buildings, watercourse and pond, and lowland mixed deciduous woodland. The constraints include priority habitats which have the potential to support protected species as well as watercourse creating a buffer from development. However, these constraints are overcome via the key ecological opportunities.

4.18 The key ecological opportunities include the creation and enhancement of habitats within Green Infrastructure which will provide a net gain in Priority Habitats such as species rich

hedgerows, traditional orchards and wildflower meadows. Habitats with low ecological value, such as modified grasslands, offer opportunities for habitat improvement. Provisions for Biodiversity Net Gain will also be implemented.

4.19 A Habitat Management and Monitoring Plan could also form a condition to a future planning permission which would ensure the long-term management of all retained and proposed habitats.

4.20 If species are identified on site, the provision of new reptile hibernation sites and boxes for birds, dormice, bats and invertebrates could also be provided within the Public Open Space as well as within the structure of the new buildings.

#### Tree/Arboriculture

4.21 A Tree Survey Report has been prepared by RPS, in February 2025, in respect of the proposed development. A total of 86 individual trees were surveyed during the assessment. Additionally, the survey recorded 55 tree groups, 1 woodland area, 30 hedges, and 2 scrub areas. Most of the trees on the site were located either in the old nursery to the south, within the woodland along the northern boundary, or as hedgerow trees. The rest of the survey area consisted mainly of open fields. It is noted that there are no TPO's, Ancient Woodlands or Veteran trees on the Site.

4.22 The report also provides considerations for the design and site layout, stating that the current and future potential of tree growth should be considered. It also highlights the need to avoid any works to Root Protection Areas.

## Heritage

4.23 A technical paper has been produced by TCMS Heritage which represents a high-level summary of Archaeology and Built Heritage evidence base at this preliminary stage. The report sets out the Key Opportunities and Constraints, Proposed Strategy and Conclusions.

4.24 In terms of Archaeology, the key opportunities and constraints include the Dumpdon Camp Scheduled Monument which is located c. 2.5 km to the north of the site and is considered a dominant feature in the wider landscape. The site is said to have a negligible potential for archaeological deposits dating to Prehistoric and early Medieval Periods, a medium potential for deposits from Roman and Medieval Periods, which would be of low significance if present, and a high potential for deposits from the post-Medieval Period.

4.25 In terms of Built Heritage, there are no designated heritage assets within the Site.

4.26 The site is said to have a negligible contribution to the overall setting of Dumpdon Hill Fort Scheduled Monument (1018851) due to its very small scale within the otherwise extensive landscape setting of the monument. The report recommends that a non-intrusive geophysical survey is carried out as well as appropriate mitigation measures for the retention of existing historic hedgerows and patterns of field drainage within the site. The application should be designed to include mitigation measures to minimise any direct/indirect impacts on significant heritage assets.

4.27 To conclude, the report states that the heritage constraints do not represent an overarching constraint to the development and that there is no heritage reason for the site not to be allocated within the emerging Local Plan.

## Evolving Masterplan / Vision Document

4.28 A Vision Document has been prepared by Stantec to accompany these representations which sets out the proposed vision for the Site. The vision for the site is to provide a vibrant and sustainable new development to the east of the town of Honiton which is well integrated within the existing settlement and landscape setting. The document relays how the development will provide a logical extension to the Honiton while retaining and enhancing a network of green open spaces for the enjoyment of the wider community. The site will accommodate new homes in order to meet local housing demand, including that of affordable housing, with the opportunity to provide a new neighbourhood hub. The site will also have excellent local connections to the existing settlement, encouraging active travel offering ample opportunity for sustainable and local living.

4.29 The proposal supports a form of development that accords with the ecological hierarchy and by focusing on avoidance, mitigation and enhancement measures and can deliver biodiversity net gain.

## Summary / Planning Benefits

4.30 The proposed development will deliver the following benefits:

- The provision of up to 115 dwellings on land north of the railway line and 285-300 dwellings on land south of the railway line, making efficient use of land and delivering a significant contribution to the Council's housing needs in the short to medium term;
  - The opportunity for the creation of significant areas of informal and formal public open space, including allotments, community park, play space and walking routes;
  - Delivery of a neighbourhood hub;
  - Delivery of ecological enhancements and on-site biodiversity net gain;
- 
- The provision of attenuation basins to the south of the site offering a sustainable urban drainage system (SuDS) which also offer a habitat for aquatic wildlife; and
  - off-site improvements to highways, improving traffic flow and enhancing pedestrian and cycle connectivity for new and existing residents.

5.1 These representations and accompanying Technical Notes demonstrate that the current draft allocation at Land South of Northcote Hill – south of the railway line (GH/ED/39a), which restricts the development of the site to 100 homes, does not

constitute effective use of land or optimises the use of land to accommodate an appropriate amount and mix of development (in accordance with NPPF 2023; Paragraph 135e).

5.2 The Draft LP policy for land south of the railway line (GH/ED/39b) should be increased to 285-300 homes for the following reasons:

1. It would make efficient use of the site in accordance with national policy;
2. It would enable the site to support additional uses in the form of a community park and additional facilities such as a neighbourhood hub, as well as making a more meaningful contribution towards EDDC's housing land supply and meeting the housing needs of East Devon in a sustainable location;
3. The site is being promoted by a national housebuilder that is committed to delivering homes in the short-medium term – increasing the quantum of development on this allocation would ensure the draft LP delivers sufficient homes throughout the first part of the Plan period to meet its needs, noting the concerns raised regarding the delivery assumptions of the new settlement east of Exeter.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

5.3 To ensure the draft LP makes the most efficient use of land the draft allocation should be revised as follows: Land south of Northcote Hill – south of the railway (GH/ED/39b)

This site is allocated for 300 homes and will form a medium-scale residential extension on the eastern side of Honiton. Parts of the site are on more elevated ground and development will need to be sensitively planned to avoid adverse impacts on the nearby Blackdown Hills National Landscape area. Vehicular and pedestrian access improvements would be required, incorporating Northcote Hill into development. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD03

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

2.54 We welcome the designation of Honiton as a Tier 2 settlement and a sustainable location for future growth and development.

2.55 It is welcomed that land south of Northcote Hill (north and south of the railway line) is identified as two draft allocations within the draft LP. Taylor Wimpey supports the allocations and can confirm that both sites are suitable and available for immediate development. Both sites can contribute to the Council's immediate housing land supply.

2.56 We discuss each of these allocation in turn below.

2.57 Land south of Northcote Hill (north of the railway line) (site reference - GH/ED/39a) – An outline planning permission was resolved to be approved on the allocation site by East Devon Planning Committee for the development of up to 115 homes, public open space, sustainable drainage systems, landscaping, vehicular access via Tunnel Lane and associated highways improvements and infrastructure. The proposed development was for up to 115 homes.

2.58 Land south of Northcote Hill (south of the railway line) (100 homes) (site reference – GH/ED/39b) – We support the allocation of the site for residential

development; and consider that the site has capacity for up to 285-300 homes. Taylor Wimpey have recently undertaken a full suite of technical work (summarised in section 4 of these representations) that confirms the site can comfortably accommodate a significantly higher quantum of development (285- 300 homes) which could deliver an extensive community park and other public benefits including a neighbourhood hub. The enclosed Vision Document demonstrates how a landscape-led development, with homes provided alongside extensive areas of public open space, including a new community park, can deliver 285-300 homes.

2.59 Taylor Wimpey welcomes the site's identification as an allocation within the draft LP and considers that the allocation has the potential to make a more significant contribution towards the district's housing land supply as shown on the masterplan submitted with these representations, alongside the delivery of additional public benefits for existing and future residents.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

2.60 Taylor Wimpey request that the proposed allocation at Land south of Northcote Hill (south of the railway line) is uplifted to 285-300 homes to ensure the allocation makes the most efficient use of the site in accordance with National Policy and Guidance.

2.61 The draft LP policy should be amended accordingly, and draft revised policy wording has been provided at Section 5 of these representations.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD03

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:** NPPF Transitional Arrangements

1.9 It is acknowledged that EDDC state that the Plan should be examined under the 2023 version of the NPPF, in line with the NPPF Transitional Arrangements set out at Paragraph 234a). This requires Regulation 19 Consultation to be reached before March 12th 2025, with a draft housing requirement that is at least 80% of the authority's Local Housing Need (LHN) figure.

Unpublished Evidence Base

1.10 It is evident, however, that this Regulation 19 Consultation does not include the full suite of evidence base, with the following documents noted as 'still to follow':

- CCF-001 - Water Cycle Study
- CCF-002 Strategic Flood Risk Assessment Surface Water Zone
  
- CCF-005 - Coastal Change Topic Paper
  
- HCO-004- Playing Pitch Strategy

- HCO-005 - Open Space Strategy
- HCO-006 - Sports Facilities Study
- HRD-004 - East Devon Heritage Strategy (2024-2042)

#### Two Phased Regulation 19 Consultation

1.11 Introductory text within this Draft LP also confirms that EDDC will be undertaking a second phase of Regulation 19 Consultation in Spring 2025, which will include additional detail regarding the new community (Strategic Policy WS01) and ‘other inter-related local plan matters’. The Draft LP proceeds to state, ‘once this evidence work is completed, and policy gaps in the plan can be filled in, and further policy refinement undertaken, the second phase of consultation will take place’.

1.12 It is evident that the new community is an integral part of the Draft LP strategy, and the delivery assumptions are fundamental to ensure EDDC achieve a housing requirement that is within 80% of their LHN figure. We raise significant concerns regarding EDDC’s approach in releasing piecemeal evidence that underpins this new community. It is evident that the approach to undertaking the Regulation 19 Local Plan in two parts is to allow EDDC to benefit from the NPPF Transitional Arrangements set out at Paragraph 234a). It is our view

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No**

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**

-

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

1.1 These representations have been prepared by Boyer on behalf of Taylor Wimpey UK Ltd, in response to the East Devon District Council (EDDC) Local Plan (Regulation

19) Consultation Document (hereafter referred to as the “Draft LP”), in promotion of land off Northcote Hill, to the east of Honiton (the site).

1.2 Representations have been previously submitted as part of EDDC’s Regulation 18 Consultation undertaken in 2022, and the second Regulation 18 Consultation in 2024.

1.3 The site is dissected by the East Devon Railway Line into two parts, identified as Phase I (north of the railway line) and Phase II (south of the railway line). It is welcomed that both parts have been identified as allocations within the Draft LP:

- The land north of the railway line, which is proposed by the Council as a residential Local Plan allocation of approximately 100 homes; and referred to as ‘land north of Northcote Hill, north of the railway line’ (GH/ED/39a); and
- The land south of the railway, which is proposed by the Council as a residential Local Plan allocation of approximately 100 homes; and referred to as ‘land south of Northcote Hill, south of the railway line’ (GH/ED/39b).

1.6 Together, the site can create a sustainable new neighbourhood to the east of Honiton, providing approximately 400 homes. This includes 115 homes on land north of the railway line; and 285-300 homes on land south of it. By doing so, the proposed allocation would significantly contribute towards the Council’s housing land supply, in accordance with the Council’s spatial strategy.

#### Phase II Supporting Documentation

1.7 These representations should be read alongside the following technical reports, which support an increased quantum of development proposed for Phase II:

- Vision Document (prepared by Stantec) (which includes a concept masterplan for land north and south of the railway line);
- Tree Survey Report (prepared by RPS);
- Drainage Technical Note (prepared by Phoenix Design);
- Ecology Deliverability Report (prepared by EAD Ecology);

- Heritage Technical Note (prepared by TCMS);
- Landscape Visual Assessment (prepared by Stantec); and
- Transport Appraisal (prepared by TPA);

#### Test of Soundness

1.8 These representations respond to the relevant draft Local Plan policies, with particular consideration given to the NPPF's tests of soundness:

- Positively Prepared;
- Justified;
- Effective; and
- Consistent with National Policy

that this does not represent effective plan-making or the Government's objective to significantly boost the supply of homes.

1.13 The Draft LP in its current consultation form therefore fails to meet Section 19a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 as a copy of each of the submission documents has not been made available for consultation. It cannot therefore be considered that this Draft LP meets the definition of a comprehensive Regulation 19 Consultation.

1.14 Notwithstanding this, should this Draft LP be examined under the provisions of the previous NPPF (2023), these representations reference the soundness of this Draft LP against the requirements set out within the NPPF (2023).

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any**

**matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

1.4 We support the principle of both allocations; however, we strongly consider that the number of homes proposed for the land south of the railway line (Phase II) must be increased to 285- 300 homes. This increase is essential for ensuring that the allocation (and future scheme) makes effective use of the land and optimises its potential to accommodate an appropriate amount and mix of development as well as making a meaningful contribution towards meeting housing needs in East Devon (in accordance with NPPF 2023; Paragraph 135e).

1.5 Increasing the number of homes on land south of the railway line will enable the proposed development to offer more public benefits, such as a neighbourhood hub and significant public open space, potentially including a community park.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC01

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:** Strategic Policy  
CC01 requires that developments must support East Devon's target to become carbon neutral by 2040, through:

Supporting movement to net zero development; and

Maximising opportunities for delivery of low carbon and renewable energy, district heat networks, and energy storage facilities.

The policy is acknowledged; however, it should be recognised that the implementation of the Future Homes Standard (FHS) will largely influence the sustainability requirements that must be adopted for housebuilding across England. The implementation of the FHS will support East Devon's target to become carbon neutral by 2040, and therefore, any policy requirement which goes beyond the requirements of building regulations (now or in the future) must be justified and supported by relevant viability assumptions and assessment.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC01

**3. Do you consider that this part of the Mitigating Climate Change chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:**

2.62 Strategic Policy CC01 requires that developments must support East Devon's target to become carbon neutral by 2040, through:

- Supporting movement to net zero development; and
  
- Maximising opportunities for delivery of low carbon and renewable energy, district heat networks, and energy storage facilities.

2.63 The policy is acknowledged; however, it should be recognised that the implementation of the Future Homes Standard (FHS) will largely influence the sustainability requirements that must be adopted for housebuilding across England. The implementation of the FHS will support East Devon's target to become carbon neutral by 2040, and therefore, any policy requirement which goes beyond the requirements of building regulations (now or in the future) must be justified and supported by relevant viability assumptions and assessment.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC02

**3(a). If yes, and you wish to support the soundness of this part of the Mitigating Climate Change chapter, please use this box to set out your comments.:** Vistry continue to support the Council's declaration of a climate emergency and acknowledge that there is a need within the Draft LP for a policy which requires new developments to respond to, and mitigate, the effects of climate change.

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:** However, Vistry have significant concerns with regards to the requirements for 'all new homes' and 'all development' as detailed within Strategic Policy CC02 and question if the level of detail required is a justified request based on a robust evidence base.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Mitigating Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Mitigating Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Policy requirements should be based upon existing legislation such as Part L of the building regulations and the Future Homes Standard requirements. Whilst it is acknowledged that meeting energy efficiency requirements as set out within the building regulation Future Homes Standard 2025 or successor standards will provide measures to achieve the overarching goal of net-zero carbon development, the proposed policy should not be a duplicate to Building Regulations; and viability must be considered and sufficient flexibility built into the policy.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC02

**3. Do you consider that this part of the Mitigating Climate Change chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:**

2.64 Strategic Policy CC02 requires all new homes to meet the energy efficiency requirements set out in the building regulations Future Homes Standard (FHS) 2025. It is anticipated that the FHS will come into force in 2025, therefore on adoption of this Draft LP it is assumed that this policy will be unnecessarily repeating other legislation and requirements and will therefore not be required.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Mitigating Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Mitigating Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

2.65 The policy also requires all new developments to demonstrate at the application stage that the relevant standards can be achieved. It should be recognised that such information, which relates to detailed interior and exterior design will only be available at detailed design stage, therefore is unlikely to be available at the point of Outline planning application submission. The policy text should be revised accordingly.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC02

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:** PHSW consider that Strategic Policy CC02 is unnecessary as Future Homes Standard (FHS) will come into force by the adoption of the Draft LP, and that the current policy text repeats legislation and requirements which is not required.

In addition, the PHSW consider that the proposed policy text should be amended accordingly, to ensure that there is flexibility with particular regards to application types, as it is unlikely that this information will be available at outline application stage.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Mitigating Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Mitigating Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The policy text should therefore be updated to acknowledge this will only be available at a detailed design stage.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC05

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:** We object to this policy which is not justified or supported by sufficient robust evidence.

Strategic Policy CC05 proposes that all major developments within 1km of an existing heat network be connected or provide a new heat network for proposals over 1,200 homes where no heat network currently exists. The proposals at Addlepool Farm fall below the threshold of 1,200 dwellings and therefore it is not anticipated that a heat network would be required to be delivered as part of this site.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Mitigating Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Mitigating Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Notwithstanding this, further work is also needed to demonstrate that a heat network can be secured at an affordable price that would benefit from the same safeguarding as a domestic supply. As present, the ability to access heat networks is outside of the control of the developer/landowner and this Draft LP policy should be removed.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC05

**3. Do you consider that this part of the Mitigating Climate Change chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:**

2.66 We consider that this policy is not justified and is unsound.

2.67 Strategic Policy CC05 proposes that all major developments within 1km of an existing heat network be connected, or provide a new heat network for proposals over 1,200 homes where no heat network currently exists. It is understood that Honiton does not, at present, benefit from a heat network. The allocations proposed at Honiton (including Land off Northcote Road (site references - GH/ED/39a and GH/ED/39b)) fall below the threshold of 1,200 homes and therefore it is not anticipated that a heat network would be required to be delivered as part of any of these allocations.

2.68 Further work is also needed to demonstrate that a heat network can be secured at an affordable price that would benefit from the same safeguarding as a domestic supply. As present, the ability to access heat networks is outside of the control of the developer/landowner and this Draft LP policy should be removed.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC05

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:** Strategic Policy CC05 requires “For all major developments proposed within 1km of an existing heat network connection to the existing heat network should be provided”.

As currently worded, Strategic Policy CC05 is unjustified and unsound for the following reasons:

- There is no flexibility within the policy when considering on a case-by-case basis if achieving a connection is feasible;
- Further information is required regarding where the existing heat networks are located within East Devon to ensure there is clarity on networks and connectivity requirements. The draft policy map does not currently include heat network areas.

As the ability to access heat networks is currently outside of the control of the landowner and developer, further work is required to demonstrate that the heat network can be secured at an affordable price, whilst benefiting from the same safeguarding as a domestic supply.

As land at east Axminster will deliver up to 100 homes, it is not anticipated that a heat network would be delivered as part of the development.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC06

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:** We have two key concerns regarding this policy:

1. The assumption that applications at each stage can be supported by an embodied carbon assessment submitted via a Whole Life Carbon Cycle Assessment (WLCCA) procedure; and

2. Viability Assumptions.

These are discussed in turn below.

#### PREPARATION OF A WHOLE LIFE CARBON CYCLE ASSESSMENT (WLCCA)

This policy is underpinned by two pieces of evidence including CCF-018 - Whole Life Carbon Assessment for the Built Environment (2nd Ed.) and CCF-024 - RICS Whole Life Carbon Assessment for the Built Environment (1st Edition - 2017). Both documents confirm the methodology and requirements for preparing a WLCCA. The reporting table requires significant amounts of information relating to the proposed development including GIA, Facilitating Works, Substructure, Finishes, Fixtures and Fittings.

## VIABILITY ASSUMPTION

It is also noted that the Draft LP Viability Assessment (Core Submission Document CSD-004), makes no allowance for this policy requirement, confirming that the need to prepare an embodied carbon assessment is considered to fall within the remit of Professional Fees. Whilst we do not disagree with this approach, particularly given the high-level nature of Local Plan Viability Assessments, we note that the Draft LP Viability Assessment has applied the assumption that Professional Fees are reduced to 6% of build costs for developments in excess of 101 dwellings.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Mitigating Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Mitigating Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** PREPARATION OF A WHOLE LIFE CARBON CYCLE ASSESSMENT (WLCCA)

Strategic Policy CC06 needs to acknowledge that such inputs will not be available at the outline stage of a project or application and would require the assessor to adopt a considerable number of assumptions. This is impractical and goes beyond the remit of an outline application which is only seeking permission for the principle of development.

## VIABILITY ASSUMPTION

We strongly consider that this assumption is insufficient and the assumption that these fees fall to 6% of build cost on larger schemes is not justified and does not represent best practice in viability assumptions. Professional Fees for all viability assessments should range between 8-10%.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC06

**3. Do you consider that this part of the Mitigating Climate Change chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.:**

2.69 This policy requires all major development to undertake an embodied carbon assessment submitted via a Whole Life Carbon Cycle Assessment (WLCCA) procedure.

2.70 This policy is underpinned by two pieces of evidence including CCF-018 - Whole Life Carbon Assessment for the Built Environment (2nd Ed.) and CCF-024 - RICS Whole Life Carbon Assessment for the Built Environment (1st Edition - 2017). Both documents confirm the methodology and requirements for preparing a WLCCA. The reporting table requires significant amounts of information relating to the proposed development including GIA, Facilitating Works, Substructure, Finishes, Fixtures and Fittings. Strategic Policy CC06 needs to acknowledge that such inputs will not be available at the outline stage of a project or application and would require the assessor to adopt a considerable number of assumptions. This is impractical and goes beyond the remit of an outline application which is only seeking permission for the principle of development.

2.71 It is also noted that the Draft LP Viability Assessment (Core Submission Document CSD- 004), makes no allowance for this policy requirement, confirming that the need to prepare an embodied carbon assessment is considered to fall within the remit of Professional Fees. Whilst we do not disagree with this approach, particularly given the high-level nature of Local Plan Viability Assessments, we note that the Draft LP

Viability Assessment has applied the assumption that professional fees are reduced to 6% of build costs for developments in excess of 101 homes. We strongly consider that this assumption is insufficient and the assumption that professional fees fall to 6% of build cost on larger schemes is not justified and does not represent best practice in viability assumptions. Professional fees for all viability assessments should range between 8-10%.

2.72 We also object to the policy text which relates to the need to retain existing habitable buildings with new development (except for in exceptional circumstances).

2.73 At present, this policy is not justified. There may be instances whereby retrofitting and converting an existing building is less sustainable than its demolition and rebuild as a new build property, that would accord with the building regulations and relevant updated sustainability requirements. In such instances, where it is demonstrated that this is the case, the proposals for demolishing and rebuilding the dwelling should not be resisted.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

7. Adapting to Climate Change

**1. To which part of the Adapting to Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** We support the principle of a flooding-related policy, however, we consider the policy wording to lack in flexibility and is overly onerous to the development industry, without appropriate justification.

Criterion a) requires development proposed in a flood risk location from any source to demonstrate that there is no sequentially preferable location for development. We consider that additional clarification is required to ensure this policy aligns with the NPPF. Planning applications will be determined against their compliance with the most up to date National Guidance and PPG. In respect of sequential tests (ST), it is clear that these are only required to be undertaken in instances where build development/land rising/access or egress/internal road layout are located within areas at risk of flooding (from all sources). A ST is not required where POS is located within areas at risk of flooding. We consider that additional clarity is required to ensure this policy is not ambiguous to the decision-maker.

We disagree with Criterion c) requirement regarding delivering developments which result in a lower than greenfield run off rate. We have reviewed the 'Sustainable Drainage System – Guidance for Devon', which states that "for developments on greenfield sites, runoff rates post development should never exceed greenfield runoff rates for the same return period event." There is no requirement for developments to deliver a lower greenfield run off rate. Whilst we support an encouragement for developments to deliver a betterment in respect of greenfield run off rates, DCC guidance is clear that this is not a requirement, rather, existing greenfield run off rates shall not be exceeded. We propose that the policy is reworded accordingly, as currently worded it is not justified and not supported by proportionate or robust evidence.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Criterion a) - We consider that additional clarity is required to ensure this policy is not ambiguous to the decision-maker.

Criterion c) - We propose that the policy is reworded accordingly, as currently worded it is not justified and not supported by proportionate or robust evidence.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

7. Adapting to Climate Change

**1. To which part of the Adapting to Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

**3. Do you consider that this part of the Adapting to Climate Change chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:**

2.74 We object to the following criteria within this policy, which is not effective and therefore unsound.

2.75 Criterion a) requires development proposed in a flood risk location from any source to demonstrate that there is no sequentially preferable location for development. We consider that additional clarification is required to ensure this policy aligns with the NPPF (2023). Whilst it is acknowledged that this Draft LP is likely to be examined against the previous NPPF (2023), planning applications will be determined against their compliance with the most up to date NPPF and NPPG. In respect of sequential tests (ST), these are only required to be undertaken in instances where build development/land rising/access or egress/internal road layout are located within areas at risk of flooding (from all sources). A ST is not required where POS is located within areas at risk of flooding. We consider that additional clarity is required to ensure this policy is not ambiguous to the decision-maker and therefore effective and sound. Further revisions to flood risk guidance are also expected to be published by the Government in the coming months and this policy should take account of this.

2.76 Criterion c) requires “ensuring that space is provided on all development sites for the inclusion of SuDS designed to reduce the volume and rate of runoff to less than greenfield rates, as informed by the ‘Sustainable Drainage System – Guidance for Devon’. Surface water run-off should be managed as close to the source as possible.” We have reviewed the ‘Sustainable Drainage System – Guidance for Devon’, which

states that “for developments on greenfield sites, runoff rates post development should never exceed greenfield runoff rates for the same return period event.” There is no requirement for developments to deliver

a lower greenfield run off rate. Whilst we support an encouragement for developments to deliver a betterment in respect of greenfield run off rates, DCC guidance is clear that this is not a requirement, rather, existing greenfield run off rates shall not be exceeded. Notwithstanding this, the policy should clarify if the greenfield rates referenced in this draft policy are based on impermeable area or developable area. It should also be noted that you cannot reduce volume of runoff on a greenfield site unless there are soakaways, this policy must be updated accordingly.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

2.77 We propose that the policy is reworded accordingly, as currently worded it is not justified and not supported by proportionate or robust evidence.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

7. Adapting to Climate Change

**1. To which part of the Adapting to Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** It is noted that the Water Cycle Study is not currently published and does not form part of the existing Draft LP Regulation 19 Consultation evidence base. Vistry therefore consider that Strategic Policy AR02 is not justified as there is a lack of supporting evidence that is robust, and that the policy text is not consistent with current Building Regulations.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Adapting to Climate Change chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** In the absence of the relevant evidence base, Vistry suggest that an amendment to the policy text be made to ensure that reference is made to Building Regulations G2 and the water efficiency standard of 125 litres per day to ensure that the policy is not unsound. In addition, acknowledgement should be included within Policy AR02 stating that developers cannot impose water usage restrictions, and that developers can only install and encourage occupiers to adopt water efficient methods.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

7. Adapting to Climate Change

**1. To which part of the Adapting to Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

**3. Do you consider that this part of the Adapting to Climate Change chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:**

2.78 This policy states that all homes must meet the optional Building Regulation G2 standards of 110 litres per day. Supporting policy text states that the water cycle study provides clear evidence for adopting the stricter standard of 110 litres per day in East Devon to address water stress.

2.79 The Water Cycle Study has not been published and is not available to view as part of this Draft LP Regulation 19 Consultation. This lack of supporting evidence base clearly highlights that this policy is not supported by robust evidence and the stricter optional Building Regulations is not justified.

2.80 Furthermore, East Devon is not classified as a water stress area, promoting questions about the justification for imposing limits on water usage. Water consumption is a matter already covered by the Buildings Regulations Regime, making a specific plan policy on this matter unjustified.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN01

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:** We support the principle of Strategic Policy HN01 and recognise the need for new developments and housing to address the Council's needs. In addition, Vistry continue to welcome the use of local market evidence and sales information as a method to determine appropriate housing need as this provides flexibility for the market to inform the types of dwellings that should be delivered on development sites.

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** Vistry suggest that the policy text be amended to ensure that sufficient flexibility is built into the policy with regards to the requirement for the provision of serviced plots (for self-build / EDDC Regulation 19 Consultation: Representations | Land at Addlepool Farm custom build) and the requirement for all new development. Vistry continue to question if this request is justified.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** It should be acknowledged that in cases where there is no demand for self-build plots, the developer should not be penalised for not delivering specialised dwellings on new development and should be driven by demand.

To ensure that Strategic Policy HN01 is justified in accordance with the NPPF, the policy text should therefore state that “D. Serviced plots of land for self-build and custom housebuilding will be sought on new developments where there is an evidenced market demand”.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN01

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:**

2.81 We support the principle of Strategic Policy HN01 and the need for new developments and housing to meet existing needs. We also welcome the recognition that up-to-date local housing need evidence assessments can be referenced when assessing existing and future housing need.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To this end, we consider that the Plan should include housing allocations that deliver 100% of the housing needs of East Devon, rather than only 80%. As drafted the Plan falls approximately 238 homes per annum short of meeting the community's housing needs.

2.82 It also should be recognised that local market evidence and sales information, which should be considered within the wider remit of local housing need evidence, can be used as a method to determine appropriate housing need, and can often provide useful local intelligence beyond that set out in District wide evidence.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN02

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:** Vistry support Strategic Policy HN02 and the approach made to affordable housing with regards to allocated sites and windfall development. It is acknowledged that this requirement will assist the Council in meeting and addressing housing need and worsening affordability gap.

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** In accordance with Strategic Policy Addlepool Village is proposed to deliver 35% affordable housing which will assist the Council in meeting their affordable housing need (which is understood to be one of the highest detailed within the proposed affordable housing requirements within Policy HN02).

The policy provides a breakdown of affordable housing tenures and mix, which provides no flexibility for the development industry and fails to recognise market variance. At present, the policy therefore does not accord with paragraph 86(d) of the NPPF (2023) which requires planning policies to be “be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”. We therefore raise concerns in respect of the proposed affordable housing mix within Policy HN02, and request that additional flexibility be provided as it should be recognised that local market information should be used to inform the appropriate tenure breakdown, beyond that set out within the District wide housing needs assessment. The proposed affordable housing mix should therefore be considered on a case-by-case basis and allow alternative mixes where necessary.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have**

**identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To be considered effective and sound, Strategic Policy HN02 should provide greater flexibility and allow developers to depart from the affordable mix set out within the tables where this is robustly evidenced. Departure from the proposed affordable housing mix should be considered acceptable when sufficient market evidence is provided, particularly if the overall percentage of proposed affordable housing meets the requirements as set out within Policy HN02. Vistry suggest that the prescribed tenure mix should therefore be used as a guidance and starting point only.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN02

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:**

2.83 This policy prescribes the affordable housing requirements required on all developments across East Devon. For site allocations within Honiton, affordable housing is set at 30%. We agree with this approach.

2.84 The policy also prescribes the breakdown of affordable housing mix, delivering 65% Social Rent and 35% Intermediate or other forms of affordable housing, we object to this inclusion, which is inflexible and does not allow for market variance. An affordable housing mix should be prepared on a site-by-site basis and allow for changes in affordable housing need which may warrant an alternative tenure mix.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

2.85 The policy text indicates that a departure from the affordable housing tenure mix prescribed in the policy can be proposed, but that this would need to be supported by viability evidence. We object to this approach. Market evidence should be considered sufficient to allow for a departure from the tenure mix, particularly when the overall quantum of affordable housing provision meets the requirements of this policy. This must be recognised within the policy text and additional flexibility should be provided to ensure this policy is effective and meets the test of soundness.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN02

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:** The proposed targets for affordable housing with Policy HN02 are supported by PHSW. For sites falling within the settlement boundary within Axminster, affordable housing is set for 25%. We agree with this approach and can confirm that land at east Axminster is policy compliant with the ability to provide 25% affordable housing.

It is noted the policy provides a proposed tenure mix of 65% social rent and 35% intermediate or other forms of affordable housing. Whilst the principle of the tenure mix is supported, PHSW suggest that sufficient flexibility should be included for all forms of development to ensure that affordable housing accords with the definition within Annex 2 of the NPPF. It is acknowledged that flexibility has been provided with regards to tenure mix for sites in Axminster, which is welcomed.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN03

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:** Vistry support the principle of Policy HN03 and recognise the importance of housing to meet the needs of older people, given that evidence suggests that there is a need for a greater number of units for older persons due to an aging demographic across the District. However, we are concerned that greater emphasis must be placed on the viability of this provision as some sites may not be suitable for older persons specialist housing.

It is noted that the requirement for housing proposals, subject to commercial viability, “schemes for 200 or more dwellings should include at least 10% as on-site as specialist older persons dwellings as either C3 dwellings and/or C2 equivalents”.

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** The reduction from 20% to 10% for schemes over 200 dwellings is welcomed, however Vistry consider that the current policy wording is not effective, nor justified, as it fails to consider the specific locational needs of specialist housing (such as proximity to town centres or well established public transport routes), which may render such dwellings typologies unsuitable for major development sites. At present therefore, the policy is not considered sound.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The proposed policy text should be reworded to recognise that older persons units will only be required where there is up to date evidence and an evidenced market demand, subject to viability.

Addlepool Farm would create a new sustainable village and destination. Should there be a demand for specialised homes, in accordance with this Policy, these could be delivered as part of the future scheme.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN03

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:**

3.1 Policy HN03 requires that residential schemes for 50-199 homes are required to meet the requirements relating to older person homes.

3.2 The policy stipulates that for residential developments of 50-199 homes, a minimum of 10% of the homes should be designated for specialist older person housing (Class Use C3). While it is acknowledged that the provision of specialist housing for older persons is important, it is recommended that consideration be given to the viability of such provision, considering the specific location of the development. Site constraints may impact the feasible proportion of specialist older person homes that can be delivered. Additionally, it is important to recognise that residents of specialist housing may have particular locational needs, such as proximity to town centres or well-established public transport routes. They may also require closer access to community facilities and services. Therefore, it should be recognised that not all sites may be suitable for specialist housing delivery. In such cases, the Council should adopt a flexible approach when applying the requirements of this policy.

3.3 Market demand for housing to meet the needs of older people should also be considered as part of this policy. Should there be no demand for housing to meet the needs of older people, such homes should be reverted to market housing.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN03

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** Whilst addressing the growing need for diverse housing options within East Devon is supported by PHSW, the policy should include sufficient flexibility to consider sites on a case-by-case basis to ensure that local needs are considered. Whilst the reduction from a 20% requirement of specialist older persons dwellings to 10% is welcomed, as worded there is currently no mechanism for off-site contributions if necessary.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The policy text should therefore be updated to include sufficient flexibility for sites to be considered on a case-by-case basis.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN04

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:** Vistry support the principle of Strategic Policy HN04 and acknowledges that new homes should provide quality living environments for residents both now and in the future.

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** However, we believe that there should be more emphasis on flexibility and viability which should be factored into the proposed policy text.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To be considered justified, the policy text should provide more detail with regards to the Site suitability and viability considerations.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN04

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:**

3.4 Policy HN04 requires that all new homes meet specific accessibility standards from Building Regulations Approved Document M. The requirements set out as part of the policy are as follows:

- 100% of new homes meeting M42(2) standards for accessibility and adaptability;
- 100% of new specialist accommodation for older people meeting M4(3) wheelchair user standards; and
- At least 5% of affordable housing for rent and homeownership to meet wheelchair adaptable or user standards.

3.5 We support that the policy gives recognition to site requirements/typology and viability, however, further consideration to viability of the requirements should be given.

3.6 The criterion requires for 100% of new homes to meet the requirements for accessible and adaptable homes under Part M42(2) of Building Regulations. It is noted that the Council's evidence base allows for an additional £1,400 per dwelling in build costs to meet the M4(2) requirements. Taylor Wimpey considers that that this cost should be increased to at least £2,000 per dwelling. As drafted the policy is unjustified and unsound. It is recommended that the Council's evidence base is amended to reflect a more robust figure to ensure the effectiveness of the policy in the adoption of this higher accessibility standard.

3.7 The second criterion requires that 100% of new specialist accommodation for older people must meet the requirements of M4(3) wheelchair user standards of Building Regulations. The Council's evidence base suggests that an additional £138/sq.m is sufficient to meet the costs of the M4(3) requirements. It is considered that the cost is insufficient to allow for these additional requirements and therefore that the evidence base be amended to reflect a more robust cost base.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN05

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:** Vistry support the principle of Strategic Policy HN05 however we have concerns regarding the requirement for at least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self-build plots.

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** We question whether this requirement for provision of self-build and custom build housing to be delivered on all new developments above 20 dwellings is justified. In such instances where there is no demand, the developer should not be penalised for not delivering specialised dwellings on new developments.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To ensure that the policy is justified and therefore sound, the policy text should be clarified to state that such specialised housing will be sought on new developments where there is an evidenced market demand. If there is no market demand, it should be acknowledged that units should revert back to market housing too meet local demand.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN05

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:**

3.8 This policy sets out the requirements for the provision of self-build plots within new residential schemes. The policy states that on sites of 20 or more homes, 5% of those homes are required to be serviced custom or self-build plots while on larger sites (250 homes or more), a portion of plots must be designated for affordable housing with all self- build plots being completed within 3 years of purchase.

3.9 The Plan's evidence base (document 'HOU-017') which is based on 'Self-Build Demand and Supply' is out of date. This report covers the data provided for self-build need up until October 2021. This data is out of date and the policy is not robust and, therefore, unsound.

3.10 Whilst we support the aim of the policy in principle, the market demand for self-build plots needs to be reconsidered within the policy. The policy stipulates that self-build plots must be marketed for a period of 24-months before being able to revert to a 'normal' market housing. This is not considered to be reasonable. A development site may have been fully constructed and occupied within a 24-month period, and therefore the construction workers would have departed the site. It would not be reasonable for the developer to have to subsequently return to the development site to help construct a small number of self-build plots that had no demand during the 24-month marketing exercise. As a result, it will be commonplace that development sites are left with unsightly undeveloped plots of land, which often delay the provision of cycle and pedestrian connections or play facilities within the site. The marketing period within this policy should be reduced to 12-months.

3.11 It should also be noted that the developer cannot influence market demand for the self-build plots, and once the plot is sold, it is for the purchaser to obtain their own detailed planning consent. It should therefore be considered that no obligation can be placed on the developer to ensure that self-build plots are completed within 3 years of purchase, it is the role of the developer to deliver serviced plots.

**Full name:** Jemma Shorrock

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Persimmon Homes South West Limited

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN05

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:** PHSW support Policy HN05 and welcome that it is acknowledged if plots have not been sold after 2 years of being marketed, they shall be made available for development on the open market.

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:** Whilst point b of the proposed policy requires suitable road access to be delivered at an early stage in development, we consider that the proposed policy wording should include sufficient flexibility to ensure that appropriate triggers can be negotiated on a case-by-case basis.

Policy HN02 Also requires sites of over 250 dwellings or more to make available a proportion of plots for affordable housing, to be secured through legal agreement, subject to viability. PHSW consider this requirement should be removed from the policy text for the following reasons:

- The requirement for affordable housing will create viability and delivery constraints for developers;
- Joint working would be required with Housing Associations and third sector groups, creating a complexity and time constraint to the delivery of development;

- It must be acknowledged that Housing Associations and third sector groups may not be in a position to purchase self-build and custom build plots, and there may not be a local need for this addition;

- This requirement creates an unnecessary barrier to the delivery of homes.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:** Sustainability appraisal

**If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.:**

#### 1. Biodiversity

The Site is supported by a Preliminary Ecological Appraisal (PEA) to identify important ecological features. The PEA found the Site to be dominated by uniform agricultural land of low ecological value, both arable crops and cattle pasture.

It is noted that there are designated sites of international importance within a 10km radius of the Site. Mitigation for recreational impacts that may occur to these sites from an increase in residents would be secured as part of the proposals, in the form of financial contributions towards improved access management and provision of substantial alternative recreation locations. The concept masterplan also proposes extensive areas of public open space which will include walking routes and will present an alternative option.

The Site will not have an unacceptable impact on biodiversity. It is welcomed the EDDC's HELAA (2022) concluded that the Site would have no unacceptable impact on biodiversity.

#### 2. Landscape

The Site is not located within any statutory or nonstatutory landscape character or quality designations. The northern part of the Site benefits from intervisibility between the Site and Clyst St George. It is acknowledged that the southern part of the Site is on slightly elevated ground and the proposed masterplan demonstrates how the new village can be delivered sensitively in respect of its landscape context.

It is welcomed that the HELAA (2022) assessment concluded that the Site would have no impact on NLs.

### 3. Historic and built environment

It is acknowledged that Clyst St George Church (Grade II) is located to the north west of the Site and there are locations within the Site which have some visibility of the church tower.

The proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. Key view corridors have been retained and are proposed as green space to ensure that the intervisibility of the church tower can be preserved.

It is agreed that the HELAA (2022) assessment concluded that the Site will not have an unacceptable impact on heritage.

### 4. Climate change and carbon emissions - To minimise greenhouse gas emissions

The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements, new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond.

We support the HELAA (2022) recognition that “the site is within 1,600 metres of 4 or more different local facilities and within 1,600 metres of a train station or bus route with an hourly or better service”.

## 5. Climate change adaption - To adapt to the possible effects of climate change

The Vision Document demonstrates that any areas of the Site at risk of flooding (from all sources) would be kept free from development. Any future scheme would be supported by a comprehensive drainage strategy that would demonstrate that the proposed development would be safe for its lifetime. In accordance with DCC aspirations, the proposed development would seek to deliver a betterment to existing greenfield run off rates, therefore delivering a minor positive effect.

## 6. Land resources - To utilise our land resources efficiently and minimise their loss or degradation

The majority of the Site comprises of Grade 3 (good to moderate) land classification. The Site is not affected by not affected by minerals, waste, nitrate or phosphate zones.

## 7. Water Resources - To utilise our water resources efficiently and minimise their loss or degradation

The Site is not within a groundwater source protection zone or the River Axe SAC phosphates catchment.

## 8. Homes - To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure to meet East Devon's needs

Addlepool Village will be a self-contained new village, whilst connecting the development both visually and physically to the existing surrounding settlements of Ebford and Clyst St George. The proposals will include approximately 700 homes

(including both market and affordable homes), making a significant contribution towards EDDC's local housing need in the short to medium term.

The Site is owned by a single landowner and under the control of Vistry Group, who as the largest housebuilder in the UK by number of dwellings completed annually, are well positioned to both promote and construct the proposed new homes, seeing the project through from inception to completion.

9. Health and well-being - To support healthy, safe and active communities where people have access to attractive and functional recreation spaces

Addlepool Farm will be a self-contained new village, providing significant areas of new public open space, which will include allotments, sports pitches and walking routes, centred on health and well-being of future residents.

The proposed development will meet and contribute to the objectives of the Clyst Valley Trail and wider network.

10. Access to services - To provide accessible and attractive services and community facilities for all ages and interests

The Site is in close proximity and with good connectivity to the main district and regional centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is served via several bus services, including 56, 57 Gold, 58C and the 95. These routes provide connections to Topsham, Woodbury, Exeter and the villages in between. The nearby station at Topsham is located approximately 1 mile (1.6km) to the west of Addlepool Village. Great Western Rail service provides connections to Exeter, Plymouth, Taunton and beyond, including London Paddington.

The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements,

new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond.

11. Jobs and employment - To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity

The delivery of the proposed development will create numerous construction jobs and will contribute to the local economy through construction workers' spending. The provision of an onsite community hub will also deliver additional economic benefits through the creation of new employment.

12. Town centres - To safeguard and strengthen the vitality and viability of town centres

The proposed development is in proximity to Topsham and therefore the future occupiers of the development will contribute to the long-term vitality and viability of East Devon's towns. The proposed development will not compete with the facilities and services on offer in nearby Topsham, however, will provide some on-site retail to meet basic needs.

13. Connectivity and transport - To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon

The Site is in close proximity and with good connectivity to the main district and regional centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is served via several bus services, including 56, 57 Gold, 58C and the 95. These routes provide connections to Topsham, Woodbury, Exeter and the villages in between. The nearby station at Topsham is located approximately 1 mile (1.6km) to the west of Addlepool Village. Great Western Rail service provides connections to Exeter, Plymouth, Taunton and beyond, including London Paddington.

The Site is located in an area with superfast broadband (30mbps plus) as a minimum.

**Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).**

Appendix 1 4927\_107\_A Site Location Plan Final.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1745579318/projects/6734d674023a1f95dd0a926c/respondent-upload/xoz3o3niqiefczi0ajdl.pdf>; Appendix 2 4927\_05\_B Vision Document-compressed.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1745579327/projects/6734d674023a1f95dd0a926c/respondent-upload/o0gkytyb06hdvi2axify.pdf>; 250326 Addlepool Farm EDDC Regulation 19 Representations.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1745579316/projects/6734d674023a1f95dd0a926c/respondent-upload/q0bojgsjzsapognaocup.pdf>; 250327 Addlepool EDDC Reg 19 Representation Form.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1745579314/projects/6734d674023a1f95dd0a926c/respondent-upload/olffaustzza18zszq3h.pdf>

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**Proposal:** Sustainability appraisal

**If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.:**

4.2 The Council have assessed Land off Northcote Hill against the Sustainability Appraisal (SA) Objectives (site reference GH/ED/39a and GH/ED/39b) and prepared a site assessment, set out below.

4.3 On review of the SA, we are able to provide additional evidence to support the assessment of the site. It is considered that this additional evidence will enable an updated site assessment to be considered by the Council, with regard to objectives relating to transport and landscape. The current SA has restricted the site's capacity 200 homes (100 homes for site reference GH/ED/39a and 100 homes for site reference GH/ED/39b).

4.4 Boyer has undertaken a critique of the Council's assessment (set out below) and prepared a revised site suitability assessment. With this revised assessment the site is evidenced to be a suitable site that can accommodate a greater quantum of development, allowing for the draft allocation to be subsequently increased within the Draft LP.

The above revised site suitability assessment for land off Northcote Hill, Honiton (land north and south of the railway line), which has been assessed using the site's specific technical notes prepared by relevant technical consultants, demonstrates that the site can deliver 285-300 homes on land south of the railway line, and in excess of 100 homes on land north of the railway line, and continue to positively contribute towards EDDC's Sustainability Objectives.

**Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).:** 250224 Northcote Hill Honiton EDDC Regulation 19.pdf: <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1744110146/projects/6734d674023a1f95dd0a926c/respondent-upload/zfbdss4jmvxvhrwaqje2.pdf>