



13 January 2023  
Our Ref: 21.167

East Devon District Council  
Blackdown House  
Border Road  
Heathpark Industrial Estate  
Honiton  
Devon

Dear Sir/Madam,

**East Devon Local Plan 2020-2040 – Regulation 18 Preferred Options Consultation**  
**LRM Planning on behalf of Persimmon Homes**

On behalf of our client, Persimmon Homes, we enclose representations on the Regulation 18 Preferred Options consultation. Our client is the freehold owner of land adjacent to Lyme Road in Axminster which forms part of an existing allocation in the adopted Local Plan (ref: Strategy 20 - E105) as well as a preferred allocation in the emerging Local Plan (ref: Policy 19 – GH/ED/79). We offer support to the draft Local Plan, and in particular the intended continued allocation of our client's land under Policy 19. However, we raise some concerns on policies as currently worded and provide recommendations to be considered in the review of the draft Local Plan as it progresses.

**Executive Summary**

- Persimmon Homes fully support the inclusion of Land east of Lyme Road (GH/ED/79) as a preferred allocation under Policy 19.
- Persimmon Homes are progressing with a planning application on the land and can provide the Council with confidence on the deliverability of the site.
- The Draft Policies as currently worded present a potential burden to development and should be reconsidered to improve flexibility and deliverability of development over the plan period.

**Axminster**

Our client, Persimmon Homes, owns approximately 4.5ha of land at Lyme Road, Axminster which forms part of an allocation in the adopted Local Plan (East of Axminster mixed use allocation (ref: E105) as outlined by Strategy 20).

Part of the existing East of Axminster allocation is proposed as an allocation in the emerging Local Plan under Policy 19, albeit for a lesser land area. Our client's site is listed as 'Land east of Lyme Road (GH/ED/79)'. An extract of the relevant policy wording is outlined below.

**Strategic Policy 19 – Axminster and its future development**

*‘Land east of Lyme Road (GH/ED/79) and Pestaller Farm, Beavor Lane (Part of GH/ED/80 – shown as GH/ED/80a on the Policies Map) – The endorsed Axminster Masterplan provides guidance for how this*

*site should come forward. This site is allocated for 293 dwellings and 1 hectare of employment land. This is a preferred allocation'.*

We fully support Policy 19 and the inclusion of our client's land as a preferred allocation and can provide the Council with confidence that it can be delivered.

Whilst the site forms part of an existing allocation, constraints to delivery to date have included pollution to the River Axe Special Area of Conservation (SAC) meaning development of the site must demonstrate nutrient neutrality. There are also infrastructure requirements associated with the wider strategic allocation, including the delivery of a new relief road which is unviable.

The Working Draft Local Plan recognised that there have been delivery issues associated with the wider strategic allocation at land east of Axminster, including significant cost in delivering a link road and the absence of public funding to support its delivery. It is recognised in the consultation document at paragraph 6.10 that the relief road would require circa £15 million of public money to deliver.

Accordingly, the Council does not intend to continue with the strategic extension east of Axminster given the difficulty in delivering the relief road, and instead a more dispersed approach is proposed, which is subject to this consultation.

Our client's land is included as a preference in the more dispersed approach, along with land immediately north which is controlled by The Crown Estate.

The Council can be assured of the site's future deliverability given its control by Persimmon Homes, a national housebuilder with a track record for delivery. Persimmon Homes are working on a nutrient mitigation strategy to ensure development can be achieved without adverse impact on the River Axe SAC. Persimmon Homes are preparing a planning application for approximately 84 homes, which has been subject to EIA screening and scoping and is intended to be submitted this year. The proposed development would essentially represent a first phase from Lyme Road.

We support the proposed policy and site allocation as well as supporting paragraph 6.10 which recognises the deliverability issues associated with a new relief road and the recommendation that this is not carried forward into the new Local Plan. However, we would recommend that the following sentence is deleted from the policy; '*The endorsed Axminster Masterplan provides guidance for how this site should come forward*' given that the Strategic East of Axminster allocation and associated relief road is not being carried forward, in preference for a more dispersed approach. The east of Axminster Masterplan is therefore rendered obsolete.

## **Draft Policies**

### **Strategic Policy 4 – Employment Provision and Distribution Strategy**

**&**

### **Strategic Policy 5 - Mixed use developments incorporating housing, employment and community facilities**

Strategic Policy 4 seeks a net increase in sufficient new employment floorspace over the plan period. An Economic Development Needs Assessment will inform the scale of economic development to be delivered in the plan period. This does not appear to be available at the time of consultation. The location of additional employment land is to be identified in the western side of the district, including the Exeter and East Devon Enterprise Zone, at tier 1 and 2 towns and in tier 3 and 4 settlements on mixed use sites.

Strategic Policy 5 adds that in tier 1 and 2 settlements, 0.4 hectares of employment land provision is required for each 100 homes, and in tier 3 and 4 settlements, 0.1 hectares for each 25 homes.

The only exceptions are when at least one of the following apply:



- *Specific employment only allocations at that settlement provide a quantum of employment land that exceeds the ratio of 0.25 hectares of employment land per 100 houses allocated (0.1 hectares per 25 homes) when taking into account firstly total quantum needs generated by the level of housing allocations proposed for a settlement in the local plan and in addition to this the quantum needs generated by the proposed scheme.*
- *It can be clearly demonstrated that off-site provision of employment land at a settlement and at a quantum to meet or exceed above thresholds, will be delivered and is better located to meet needs.*
- *The nature of the housing being proposed (for example elderly person housing) will not generate the need for employment provision.*
- *The site, by way of non-typical characteristics or clear constraints, is wholly unsuited to provide for employment needs.*

Furthermore, where sufficient viability or other evidence precludes the employment provision sought, developers will be required to make a financial contribution for off-site employment provision to a comparable degree.

Whilst it is appreciated that the intention of the policy is to secure sustainable patterns of development with more mixed use developments, its current approach is too rigid in its application.

In the adopted Local Plan, Strategy 31 seeks 1ha of employment land for each 250 homes, the same equivalent ratio to that proposed. However, the adopted policy Strategy 31 applies to large scale major housing proposals, the scale of development that would be strategically planned for. It is also more positively worded as it does not include a list of specific exceptions, it simply adds that: ***'employment land evidence will be taken into account on suitability of existing available and unused or underused employments sites and the ability of these to meet the needs for proposed development'***.

This adopted policy approach is much more flexible than that proposed and has better regard for existing and underutilised employment land. There appears to be no rationale for changing the approach in adopted policy.

A flexible approach should also be applied to mixed use allocations where an element of employment land is sought, yet it is not feasible to deliver or surplus amounts of employment land are already available in the locality.

In accordance with paragraph 23 of the NPPF, *'strategic policies should provide a clear strategy for bringing sufficient land forward...this includes planning for and allocating sufficient sites'*. The starting point for the Council should be to identify the amount and type of employment land needed in the plan period. This needs to build upon the existing evidence, monitoring the effectiveness of the adopted policy, and provide up to date evidence of employment need. The most recently available Employment Land Review for the year ending 31 March 2021 was published in Spring 2022. It indicates that **103.45 ha of employment land is currently available**, based on the ratio of 1ha for each 250 homes embedded in the adopted policy, sufficient employment land is currently available for more than 25,750 homes.

When the Economic Development Needs Assessment is prepared it should consider surplus employment land before establishing requirements for the new plan period under Policy 4. From the point of identifying how much employment land is needed, only then should the distribution be considered, and this should be appropriately planned for to respond to the type of employment required. As currently worded, Policy 5 is reliant on all residential developments to provide a proportion of employment land, with a preference of that provision being on site to form mixed uses. The draft policy represents a 'scattergun approach' to employment provision, especially as it applies to all residential development with a threshold of 25 homes.

Other things to consider are *inter alia*:

- The changing nature of employment and the role of the internet and home working.



- Accessibility to existing employment uses and major centres, including via public transport or active travel.
- Uses other than employment that contribute to sustainable neighbourhoods.

### **Strategic Policy 28 – Net-Zero Carbon Development**

We appreciate East Devon have a target to become carbon neutral by 2040, in line with a ‘Climate Emergency’ declared by the Council in 2019. Policy 28 seeks all new residential development to deliver net-zero carbon emissions. Developers are expected to submit a “carbon statement” to demonstrate how this will be achieved.

In addition, homes are to be future proofed to avoid temperature discomfort and there is also a requirement for major development to calculate the whole life-cycle carbon emissions through a nationally recognised Assessment.

The supporting paragraph 7.6 adds that the gap between designed and actual performance, the “performance gap” is an issue to be addressed. One suggestion is to seek 10% of buildings on major developments to send energy performance and carbon emissions data to the local planning authority over five years.

The NPPF advises that the planning system should support the transition to a low carbon future in a changing climate (Paragraph 152). Planning Practice Guidance (PPG) adds that local requirements (Paragraph 009 ID: 6-009-20150327) will need to be based on robust and credible evidence and pay careful attention to viability. PPG also advises that locally set energy performance standards should not exceed the equivalent of Level 4 of the Code for Sustainable Homes (Paragraph 012 ID: 6-012-20190315).

Whilst the Council may need to apply innovative and ambitious measures in order to reach its carbon neutral goal, the policy and supported text as worded is in excess of national standards and places a burden on residential development to achieve this. Given that the carbon neutral target is at the end of the plan period, a cascade approach could help developers with a period of transition to more stringent requirements. The adopted standards relate to Code for Sustainable Home Level or equivalent and relevant energy efficiency standards are embedded in Part L of Building Regulations. More stringent ‘Future Homes Standards’ are also set to become integrated in Building regulations going forward. We would suggest a gradual transition from existing standards to the more stringent net zero standards, in line with national standards, so as to not hinder deliverability.

In terms of energy performance and monitoring, the Council should work with developers on a mutually agreeable approach. The current suggestion of energy performance data on 10% of dwellings would be extremely difficult to implement, especially once dwellings are occupied and no longer under the control of the developer. Therefore, it may be more appropriate for the Council to work with volunteering residents in gathering data.

### **Strategic Policy 33 – Heat Networks**

Policy 33 as worded requires all major developments within 1km of an existing heat network to secure connection to that network and where no heat network currently exists, a new heat network will be required for proposals above 1,200 homes or 10ha of commercial floorspace. This latter requirement relates to a scale of development that would only be relevant to the proposed New Town.

Further clarity is required on existing and proposed heat networks within the district in addition to the operation of such networks and connectivity requirements. The policy as worded provides the onus on developers to achieve a connection in order to secure planning permission and it offers no flexibility in considering whether a connection is feasible on a site by site basis. The policy in its final wording should allow flexibility. For instance, the adopted Strategy 40 – Decentralised Energy Networks policy includes the wording ‘*dwellings should, where viable, connect to any existing, or proposed, Decentralised Energy*



*Network' and where there is no network, 'should evaluate the potential for such systems and implement them where they are viable over the life of the developments in the locality.'*

The Council should also consider whether its strategy for district heat networks is consistent with its goals for net zero carbon given that often district heat networks are reliant on gas as the most viable option.

#### **Policy 40 - Affordable Housing**

Whilst there is no objection to the overall Affordable Housing target of 35% (for the majority of the district), we have reservations over the tenure mix of affordable housing, as worded this is indicated as being 64% for Social Rent and 36% for First Homes. This offers no option for Affordable Rent or other forms of affordable home ownership. It also offers no room for future initiatives towards affordability as it is very prescribed as worded. There should be flexibility to provide all forms of affordable housing as defined in Annexe 2 of the NPPF.

Furthermore, at paragraph 4 of the policy, a housing mix schedule to accord with, is provided that is taken from the East Devon Local Housing Needs Assessment (LHNA) (2022). Whilst the LHNA may provide most up to date evidence at the time of consultation, needs will alter over the course of the plan period and we would suggest that specific reference to the 2022 LHNA is removed. Broader wording should be included along the lines of mix being reflective of up to date evidenced need and market conditions.

#### **Policy 41 - Housing to meet needs of older people**

Policy 41 as worded states that *'at least 1,630 net additional specialist dwellings in East Devon to meet older person needs is expected to be delivered in the form of adapted housing delivered through Policy 41 but the Council aspires to achieve more than this amount in the plan period where consistent with plan objectives and the spatial strategy'*.

As part of this strategy it is proposed that specialist accommodation for older people comes forward through site allocations and be delivered on site; on sites for 20-199 dwellings at least 20% specialist older person dwellings (use class C3); and on site for 200 or more dwellings the same 20% requirement but as either under C3 or C2 use classes.

Given that approximately 12,000 homes are proposed for allocation in the emerging Local Plan, plus an additional 5,500 homes from the New Town beyond 2040, the blanket policy approach of 20%, well exceeds the need to meet at least 1,630 net additional specialist dwellings (by almost 1000 units). This blanket approach could create over delivery of one form of accommodation at the expense of others that are needed and as such a more targeted approach should be applied with flexibility embedded. The policy should be reviewed against PPG which recognises that many older people may want to stay within or move to general housing that is already suitable (Paragraph 012 ID:63-012-20190626) and that allocating sites for specialist housing can provide greater certainty and ability to deliver in appropriate accessible locations such as town centres, location being a key factor for older people considering whether to move (Paragraph 013 ID:63-013-20190626).

It is noted that the draft policy requirement is subject to up to date evidence and viability, but it provides an additional obstacle to conventional residential development. As is the case with employment land, instead of properly planning where specialist accommodation for older people should come forward there is an automatic dependence on housing developers to contribute towards the overall level of specialist affordable accommodation needed. Indeed, the same policy states at paragraph 4 that suitable locations for specialist older person accommodation will be within 400m walking distance of local shops and easily accessible by walking or public transport to town centres and to health, care and community facilities. Whilst new housing allocations will be within sustainable locations, they will not necessarily meet these specific accessibility requirements, and as such the Council should consider



specifically allocated specialist accommodation in the right locations rather than rely on all housing allocations to deliver 20% specialist older person accommodation.

### **Policy 42 - Accessible and Adaptable Housing**

Policy 42 requires all new dwellings to meet at least Building Regulation M4 (2) requirements (accessible and adaptable dwellings), rising to M4 (3) standards for specific dwellings (all specialist accommodation, 15% of affordable homes for rent and 10% for affordable homes for ownership and open market dwellings).

This represents a leap in requirements from the adopted Policy 36 which seeks all affordable dwellings and around 20% of open market dwellings to meet M4 (2).

PPG is clear in that planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors (Paragraph 009 ID:63-009-20190626). Whilst we appreciate that the rationale relates to an ageing population in the district, proposed requirements need to be justified with evidence. If higher accessibility standards are justified, as with ambitious targets for carbon neutrality it would be helpful to developers to have a transitional arrangement to be able to adapt to the new requirements which will have implications in terms of additional floorspace required and associated cost.

In addition, flexibility is needed as certain standards may be difficult to achieve on certain sites in terms of topography for instance and the ability to provide level step free access. Furthermore, relevant standards may evolve during the plan period therefore rather than quoting standards in the policy it may be more prudent to refer to most up to date accessibility standards in Building Regulations rather than quote the relevant standards at the time of preparing the Plan.

### **Policy 43 - Market housing mix**

As with the affordable housing mix under Policy 40, this policy also sets a housing mix schedule based on the 2022 LHNA. The same comments apply here. A table with suggested mix based on 2022 needs should not be included in the Policy text for the plan period up to 2040.

The policy as worded suggests a range of appropriate departures from the housing mix set by the 2022 LHNA at paragraph 4, one of which is local up to date evidence of housing need in the Parish. If the policy stated more generally that development should be comprised of a mix in accordance with up to date housing need evidence, there would not be potential for conflict between two standards and the appropriate evidence could be agreed by the local planning authority at the time of an application. The list of examples under paragraph 4 are also very detailed and could be broader in scope, for example '*Locations such as town centres where low density development with larger, higher value dwellings may not be appropriate*' could be simplified as local characteristics.

Paragraph 5 adds; '*Exceptionally, if a proposal is not meeting policy requirements, applicants will need to provide robust market conditions evidence demonstrating lack of marketability*'. Instead of being a separate paragraph, market conditions should be included in Paragraph 4 as one of the examples of where a departure from the 2022 LHNA may be appropriate.

### **Policy 44 - Self Build and Custom Build Housing**

5% provision for self or custom build within developments of 20 or more dwellings is accepted to be a standard approach and it is noted that the policy includes a mechanism for the plots to be delivered in the open market should there be no take up for self or custom build. Whilst the policy requirements are generally accepted, points 'b', 'c' and 'f' raises particular concern as they seek:





*b. Have suitable road access delivered at an early stage.*

*c. Be made available for sale before 50% of the dwellings on site have commenced.*

*f. On sites of over 250 dwellings, a proportion of plots must be made available for affordable housing, to be secured through legal agreement, subject to viability.*

Points b and c. seek early infrastructure delivery in providing road access and being available for sale before half the site is constructed. It would be helpful if this policy could be worded with the ability for appropriate triggers to be negotiated on a site by site basis.

We also consider the inclusion of affordable plots under point 'f' will have viability and delivery constraints. Custom and self build housing is managed by the provisions of the Self-build and Custom Housebuilding Act (2015). Councils have a legal duty to keep an up to date register of those seeking custom or self build plots. The process is already complex and by having a policy that requires affordable plots, adds an extra layer of complexity. It would require joint working with Housing Associations and third sector groups. The Act enables authorities to include up to two optional eligibility tests, these are a local connection test and a financial solvency test. The purpose of the financial solvency test is to determine whether the applicant can afford to purchase the land. In the case of affordable housing it needs to be considered whether Registered Affordable Housing Providers would be in a position to purchase plots for self or custom build, and to ensure that those individuals that are already on the Council's self-build and custom build register are not 'queue jumped'.

Custom and Self Build offers another level of housing choice in addition to conventional market housing and various forms of affordable housing. The requirement for affordable custom and self build plots should be deleted so as to not have an extra barrier to delivery of homes.

Furthermore points 'g' and 'h' could be combined and clarified to ensure any potential design code/passport relates to the self or custom build dwellings and not conventional dwellings.

### **Policy 63 - Housing Density and Efficient Use of Land**

It is noted that there is an intention to set minimum density standards to support the efficient use of land, we would recommend that this allows exceptions based upon local characteristics.

The policy as worded also seeks design codes to be agreed with or produced by the Council for major developments and those in environmentally or heritage sensitive locations. This element of the policy should be reconsidered, as worded it would suggest that a design code is required for a ten dwelling scheme or even less than ten dwellings if in a sensitive location. Significant time and resource is required in preparing and agreeing design codes, adding a financial burden and potential delay to development – as well as a burden on local authority resource.

PPG (Paragraph 008 ID:26-008-20191001) defines design codes and advises that:

*'Design codes can be commissioned or prepared by either the local planning authority or developer, but are best prepared in partnership to secure agreed design outcomes and maintain viability, particularly across complex sites and phased and multi-developer schemes. They can also be prepared for smaller sites, including self-build or custom build projects, where codes can be used to maintain a degree of certainty whilst allowing for design freedom. On large sites it can be important to allow for the code to be reviewed as development proceeds, so that lessons from its initial implementation can be addressed, provided that any changes do not subvert the overall design vision or weaken the quality of development'.*

Codes are intended to inform masterplans and Design and Access Statements, by their very nature they are a tool intended for complex schemes. Accordingly, it would be unreasonable to have a blanket requirement for design codes for every major development.

### **Policy 68 - Parking standards**



The policy sets minimum parking standards of not less than 1.6 car and 2 cycle spaces per dwelling. It also requires Electric Vehicle (EV) charging points in accordance with Building Regulations. We do not object to these requirements but would advise that given EV charging is embedded in Building Regulations, there is no need for it to be included in planning policy.

Furthermore, we would recommend that there is flexibility to parking standards based on site location, as is the case in the adopted Policy TC9 which states:

*'In town centres where there is access to public car parks and/or on-street parking lower levels of parking and in exceptional cases where there are also very good public transport links, car parking spaces may not be deemed necessary'.*

### **Strategic Policy 72 - Digital Connectivity**

The policy as worded states that planning permission for new development will not be granted unless the scheme will have access to superfast broadband. Whilst we appreciate broadband is now an expectation and viewed as an additional utility, there is no flexibility for scenarios where 'superfast broadband' may not be feasible, for example in rural communities. Furthermore, the policy adds that:

*All new ducting to serve new developments must be installed with capacity for more than one provider and other provisions to **enable the delivery of multi-operator fibre to the premises and sufficient mobile connectivity.** (our emphasis).*

The provision of sufficient mobile connectivity is subject to service provision and is beyond the control of a developer. Accordingly, this is an unreasonable request and should be omitted from the policy.

### **Policy 87 - Biodiversity Net Gain**

A Policy requirement of at least 20% Biodiversity Net Gain (BNG) is unjustified and unreasonable. The Council's justification states that the Environment Act 2021 requires all development proposals to result in BNG and that the level set in the regulations is 10%. There is no rationale provided for a figure that is double the national requirement. There is only reference to DEFRA Evidence Base and Impact Assessment Report (2017) for biodiversity net gain relating to viability. It is indicated that the majority of cost to developers is within the delivery of the first 10% of BNG, with reduced cost to deliver additional net gain beyond that, however there is still recognition that increasing BNG from 10% to 20% represents an additional cost to developers by approximately 18%.

The DEFRA evidence base is from 2017 and does not provide an up to date portrait of viability, particularly as land prices and construction costs have increased exponentially since 2017. Cost and viability aside, there is still absence of justification as to why the Council deem it necessary to have a requirement that is double that required by law, and furthermore it fails to consider additional land take required to achieve 20%. For instance where any habitat mitigation is required in the form of nutrient neutrality or Suitable Alternative Natural Green Space, this could include a large land area yet as it forms mitigation it can not be relied upon in BNG calculations – it can contribute up to a point of no net loss but not beyond. In these scenarios it would be difficult for sites to achieve 10% BNG let alone 20%.

The policy should be revised to accord with the national 10% figure and encourage any increase beyond that rather than set a minimum figure of 20% that presents an additional barrier to development.

### **Policy 92 - Tree policy**

We offer support to the tree policy in principle, however we have reservation over the wording '*provide potential net gain in canopy cover and contribution towards local canopy cover goals*'. A note adds that this is to be confirmed by the tree strategy. At this time it is unclear what is meant by net gain in





canopy cover. We consider that requiring a net gain in trees or vegetation more generally should be acceptable and would contribute towards the Council's goals. Or to continue the wording of adopted policy D3, which seeks no net loss in the quality of trees or hedgerows.

### **Policy 97 - Land and buildings for sport, recreation and open space areas in association with development.**

We have reservations that this policy seeks large amounts of open space to be delivered on-site, with little room for variation and no option for off-site delivery embedded within the policy text.

Whilst the draft policy reflects the adopted policy (Strategy 43) in terms of expectation for on-site delivery – i.e. schemes for 10-49 dwellings are expected to provide amenity open space on site, rising to the additional requirement of children's and youth play space for schemes of 50-199 dwellings and all types of open spaces (including allotments and playing pitches) expected to be delivered on site for schemes of 200 dwellings or more - the draft policy states that developments that do not meet the policy requirements '*will be refused planning permission though there will be scope through negotiation to vary types and quantities of space if net benefits achieved **can be clearly shown to be greater than the tabulated need figures***' (our emphasis).

This wording implies that variation to standards can be negotiated, however only providing that an overall increase to standards is achieved. This offers no flexibility for scenarios where minimum standards cannot be achieved. As worded there is also no mechanism for off-site contribution.

Compare this to the adopted Policy Strategy 43, which provides a more flexible approach:

*'It may be necessary or desirable to provide more of certain typologies and subsequently less of others depending on site specifics and an appropriate layout and arrangement will be considered during the planning application process. Where a developer considers an alternative mix is more appropriate evidence should be submitted with an application to demonstrate the justification for an alternative approach. Provision of new off-site open space or enhancement of existing off-site open space will be funded through the Community Infrastructure Levy (CIL) if considered necessary. Until adoption of CIL, off-site open space will be funded through financial contributions as part of a Section 106 Agreement where on-site provision is impractical or non-viable'.*

Without allowance for exception to on site provision, the policy as worded is too rigid and presents an additional burden to developers. The level of open space required on site will not be feasible for every site, there is no consideration towards individual site constraints or viability. We would recommend that the policy is revised to allow more flexibility, as is established in the adopted policy.

### **Viability**

As indicated above, there are numerous emerging policies that will have financial implications on development, in addition to infrastructure requirements associated with proposed allocations. Paragraph 34 of the NPPF outlines that policies relating to development contributions should not undermine the deliverability of the plan.

Accordingly, in preparing the Plan the Council should ensure that viability is tested to ensure development is not undermined by policy requirements.

### **Summary**

Collectively the draft policies provide immense pressure on residential development, even of a modest scale, to achieve onerous requirements in order to obtain planning permission. Residential developments are potentially expected to be:

- Carbon neutral;
- Connected to a Heat Network;



- Accessible to M4(2) / M4(3) standards;
- Inclusive of employment land on site;
- Inclusive of multiple forms of open space on site;
- Achieving 20% BNG;
- Achieving housing mixes in line with the LHNA 2022 without the option for provision of intermediate affordable housing;
- Including 5% self and custom build plots of which a proportion are affordable;
- Including 20% specialist older person dwellings on site; and
- Subject to a Design Code.

Clearly revisions are required to the draft policies in order to allow more flexibility for residential development so as to not render development unviable and undeliverable over the plan period.

Overall, we are supportive of the emerging Local Plan and commend the Council's efforts to date. We support the allocation of our client's land in Axminster under Policy 19 and can provide further evidence of the site's deliverability when required.

Our comments are aimed to be helpful and constructive, and we look forward to reviewing future iterations of the emerging Local Plan as it progresses towards adoption.

Please do not hesitate to contact us should you require any further detail.

Yours faithfully,



**John-Rhys Davies MRTPI**

**Principal Planner**

**LRM Planning**

Enc.

