

WADDETON PARK LTD
REPRESENTATIONS ON THE SECOND REGULATION 19 CONSULTATION DRAFT OF THE
EAST DEVON LOCAL PLAN (2020 – 2042) (JANUARY 2026) BY BELL CORNWELL LLP

INTRODUCTION

Waddeton Park Ltd is a very well-established and successful local housing land promoter and investor with considerable interests across the district. Waddeton Park Ltd has helped to facilitate new homes, affordable housing and other uses in the area. Specifically, Waddeton Park Ltd has interests in land at London Road, adjacent to the Cranbrook built-up area boundary, which is suitable and available for residential development. We attach a plan that shows this land (please refer to the Location Plan produced by Clifton Emery Design)

Given the nature of their long-standing interests across the district, Waddeton Park Ltd is an important local stakeholder and is interested in the proposals in the East Devon Local Plan for future development in the district.

Against this background, Bell Cornwell LLP made comments on Waddeton Park Ltd's behalf on the first Regulation 19 Consultation Draft of the East Devon Local Plan (2020 -2042) in March 2025. Comments were made on the following draft policies:

- SP01: Spatial Strategy
- SP02: Levels of Future Housing Development
- Chapter 4: Development at the West End
- WS09: Clyst Valley Regional Park
- HN02: Affordable Housing
- OL05: Green Wedges
- PB05: Biodiversity Net Gain

Bell Cornwell LLP has now reviewed the Second Regulation 19 Consultation Draft of the East Devon Local Plan. It is noted from the consultation website that comments are being sought on changes to the draft plan only and that comments submitted previously do not need to be made again —they will be provided to the inspector for review.

All comments made on the first Regulation 19 draft on behalf of Waddeton Park Ltd still stand. Comments on the Second Regulation 19 draft focus on the policy for the proposed new settlement – Strategic Policy WS01 – which was not included in the previous draft.

CHAPTER 4. DEVELOPMENT AT THE WEST END

Strategic Policy WS01: Development of Marcombe New Community East of Exeter

A very important part of the proposed spatial strategy for the new East Devon Local Plan and the strategy for how East Devon will meet its housing land supply requirement is a proposed new community – Marcombe. The strategy is flawed because there is too much reliance on this proposed new community, when there is still a lot of uncertainty over how much development can be delivered there and how quickly this could be brought forward and, therefore, on the ability of Marcombe to provide the required number of houses within the Plan period.

Critique of the Masterplan for the Proposed New Community

The masterplan for Marcombe, included in the draft Local Plan as Figure 7, is very high level at this stage. There is still a lot of uncertainty and work that needs to be done to understand whether it is feasible for the new community to deliver 8,000 new homes on the land that has been earmarked and how quickly the housing could be delivered, or even started - it is recognised widely that there will be significant challenges due to the large number of different land ownerships, the topography of the land, highways constraints etc.

Particular areas of concern are highlighted on the attached High Level Constraint and Capacity Check plan and are summarised below:

- **Density** - 180ha of land are allocated for residential development i.e. the 8,000 new homes. This results in an average density of 45dph. Indeed, the draft Policy WS01 states that Marcombe will provide a site-wide average density of at least 45 dwellings per hectare, with densities of up to 75 dwellings per hectare within and around the town centre. This is very high. By way of comparison, the density for Cranbrook town centre is not less than 55-60 dwellings per hectare (Policy CB22). It is likely that a large proportion of apartments and terraced housing would be needed to achieve this average density and it is highly questionable whether this would align with identified needs, market demand and, thus, the willingness of developers to bring forward housing in this form.
- **Topography** - There are some areas of steep ground within the masterplan area that are likely to be unsuitable for development without extensive engineering works. This could have a significant impact on the number of homes that can be delivered in these areas.

- **Heritage Impact** - There are a number of heritage assets within the masterplan area, either within or very close to areas earmarked for residential development, which, due to the need to protect their setting, could reduce the developable areas and the number of dwellings that can be delivered in these locations. More work is required in this regard.
- **Attenuation and Drainage** - Attenuation and drainage proposals look to be located in flood zones and within steeply sloping areas. Is this feasible?
- **Open Space and Biodiversity** – Is it credible that sufficient public open space, Suitable Alternative Natural Green Space and biodiversity net gain could be provided on the land that is available?

We are aware that comments along these lines have been made by a large number of other commentators, who echo the concerns outlined above. There seems, therefore, to be a consensus that there are questions over the ability of the masterplan to deliver the required development.

Opportunity for Modest Additional Growth Next to Cranbrook

Because of the significant uncertainty about over-reliance on the new community, especially for housing delivery early in the Local Plan period, sensible options for housing delivery in the West End around Cranbrook must be given due consideration and have not been (please refer to the comments made in March 2025). It would be inherently sensible to look for modest additional growth opportunities around Cranbrook, which could make a meaningful contribution to housing delivery early in the Local Plan period. This would take some of the pressure off the new community whilst there is still so much uncertainty.

Waddeton Park Ltd is promoting housing development on an area of land to the south of London Road, immediately adjacent to the Cranbrook Plan area and to the built-up area boundary of Cranbrook – please refer to the Location Plan. This land is available now and capable of early delivery. Waddeton Park Ltd has been liaising with East Devon District Council on this site since April 2025 and has been through lengthy and detailed and very positive pre-application engagement with officers, reference 25/0030/PREAPP. Detailed technical analysis has been undertaken by a group of local technical experts covering landscape and visual impact (including a detailed green wedge assessment), highways and access, ecology and biodiversity net gain, flood risk and drainage, archaeology and heritage matters, trees, noise, air quality, contamination and energy and sustainability and the conclusion of the technical reports is that development of this land for residential purposes is deliverable on technical grounds. This detailed information has informed an illustrative layout, which

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has been produced by Clifton Emery Design – a copy is attached to these comments. The detailed feasibility work that has been undertaken has determined that the following can be delivered on the site:

- A landscape-led development of approximately 136 dwellings, comprising a mix of dwelling sizes and types;
- Approximately 4.72ha of public open space, which exceeds both the adopted and draft local plan policy requirements;
- 20% biodiversity net gain, inline with the policy requirement in the draft local plan;
- Early delivery – development could commence within two to three years.

Officers have advised that they would be minded to support the proposals on this basis, having concluded that any adverse impacts of the development would not significantly and demonstrably outweigh the benefits.

The benefits of the proposals are:

- The delivery of housing, quickly, in a sustainable location;
- A policy compliant level of affordable housing, on site;
- Local economic benefits, both in terms of jobs created at the construction phase of the development and an increase in spend in the area once the dwellings are occupied;
- Large extents of public open space and SANGS;
- Early delivery – development could commence within two to three years.

As a result of the extensive work that has been carried out to-date, there is considerable certainty that a housing development on the land is credible, deliverable, in a sustainable location and able to be brought forward in a way which is entirely compatible with the character and constraints of the area in which it would be located.

Concerns Over East Devon District Council's Ability to Benefit from NPPF Transitional Arrangements

Regardless of whether or not the new community in its proposed form turns out to be feasible and deliverable, the draft Local Plan is still not sound because it is still not considered that East Devon District Council can benefit from the transitional arrangements set out in Annex 1 of the 2024 NPPF. The overall housing requirement figure of 20,909 dwellings (net) should be higher because the figure should be calculated using the standard methodology.

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The transitional arrangements apply when a Local Plan has reached Regulation 19 stage on or before 12th March 2025. Regulation 19 is a final stage of public consultation i.e. a proposed submission document. The version of the draft Local Plan published by East Devon District Council for consultation back in March 2025 did not include the draft policy wording for the proposed new community, which, as set out above, forms a critical part of the spatial strategy for the Local Plan. A complete version of the draft Local Plan did not reach Regulation 19 stage until December 2025 and, therefore, the transitional arrangements should not apply and East Devon District Council's housing land supply figures should be re-calculated using the standard methodology, which would result in a higher overall housing figure for the district for the Local Plan period. This, in addition to the significant uncertainty over the delivery of the new community, provides a strong reason to allocate additional sensible sites for housing delivery around Cranbrook in the West End located, such as Waddeton Park Ltd's land to the south of London Road.