

Land at Addlepool Farm (Addlepool Village)



EDDC Draft Local Plan 2020-2040 (Regulation 18) Representations



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APPENDIX

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1. INTRODUCTION

Overview

- 1.1 These representations have been prepared by Boyer on behalf of Vistry Group, in response to the East Devon Local Plan (Regulation 18) Consultation Document (hereafter referred to as the “Draft LP”).
- 1.2 The representations make specific reference to Land at Addlepool Farm, Clyst St George (see attached Site Location Plan – Appendix 1); and refer to related policies and the development potential of this site. Further information relating to the site is set out in Chapter 3.
- 1.3 The site has been promoted through the Call for Sites 2022, accompanied by a Vision Document. The site and proposals were also presented to the East Devon Strategic Planning Committee on November 1st 2022.
- 1.4 As set out in the accompanying Vision Document, the site 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.
- 1.5 As the largest housebuilder in the UK by number of dwellings completed annually, Vistry are well positioned to both promote and construct the proposed new homes, seeing the project through from inception to completion. Vistry have an excellent track record in delivering sustainable new communities of this scale, demonstrated through their delivery at North Whiteley, Winchester (3,500 dwellings) and at South West Exeter (1,350 dwellings). As set out within these representations, the development of Land at Addlepool Farm would accord with the Council’s spatial strategy and emerging policies and there are no technical impediments, or environmental constraints, that would prevent the site from being delivered. The positive assessment of the site by the Council’s HELAA is welcomed, as discussed at Chapter 3 of this report.
- 1.6 These representations respond to the relevant policies. Consideration has been given to the tests of soundness required to be met, as set out by Paragraph 35 of the NPPF (2021), including whether the Local Plan is:
 - a) Positively prepared;
 - b) Justified;
 - c) Effective; and
 - d) Consistent with national policy.
- 1.7 Our comments reflect the chronological order of the sections and policies within the consultation document, and our representations are set out below.

2. DRAFT LP - RESPONSES

Chapter 2 - Vision and Objectives

- 2.1 Overall, we support the Draft LP Objectives. Of particular note is Objective 4 which recognises the need to meet future housing needs. We consider that this represents an essential objective of the Draft LP, particularly noting the Council's historic affordability and delivery issues.

Chapter 3 – Spatial Strategy

Strategic Policy 1 - Spatial Strategy

- 2.2 We do not dispute the overall spatial strategy; and support the recognition that significant development has been distributed, to the 'Westend' of East Devon District, close to Exeter, as one of the most sustainable parts of the District.
- 2.3 As set out at Paragraph 73 of the NPPF:

The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).

- 2.4 Vistry are promoting Land at Addlepool Farm, which is proposed to accommodate a new sustainable and self-contained village. Its location on the edge of Exeter accords with the Council's overall spatial strategy and the proposed development would make a significant contribution to the Council's housing trajectory in the short to medium term.
- 2.5 The new village will be supported by a local centre and primary school. To this end, it should be recognised that new development (and its associated facilities) can enhance the vitality of a location by contributing to its existing services and facilities. The facilities on offer at Addlepool Village will benefit both future residents of the new village, in addition to the residents of nearby existing communities.

Strategic Policy 2 - Housing Distribution

- 2.6 Whilst the overall spatial strategy is not disputed, it is noted that the Council have allocated a significant amount of growth to the proposed new town (2,500 dwellings within the Draft LP period). We have concerns regarding the quantum of growth allocated to this new town within the Draft LP, particularly noting that the location of the new town is not yet indicated on the Proposals Map.
- 2.7 Supporting text (Paragraph 5.12) states that the Council are anticipating housing to be delivered within the new town from 2030, with the highest annual delivery to be circa. 300 dwellings.

- 2.8 Evidence demonstrates that developments of significant scale (including new towns) are characterised by the protracted delivery times of new homes.
- 2.9 A report by Colin Buchanan (2005)¹ 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. 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 2025.
- 2.10 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.
- 2.11 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.
- 2.12 Several factors also influence the delivery of strategic sites, including site conditions, local market, joint working (including partnership between local authorities).
- 2.13 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 on-site 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.**”*
- 2.14 For site capacities of 3,000 dwellings or greater, this lag time is approximately 5.5 years.
- 2.15 A more recent report, produced by Nathaniel Lichfield and Partners² analysed the deliverability of strategic sites. The report identified that the planning approval period increases the larger the site. The report confirmed that schemes of 2,000 dwellings or more averaged approximately 6.9 years from validation of application to delivery of housing.
- 2.16 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 2,500 dwellings within the Draft LP period. Previous evidence would suggest that delivery is unlikely to commence until the mid-2030s at the earliest.
- 2.17 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.

¹ Housing Delivery on Strategic Sites: Research Study - Colin Buchanan (December 2005)

² How Quickly do Large-Scale Housing Sites Deliver? (Nathaniel Lichfield and Partners; November 2016)

2.18 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.

Strategic Policy 3 - Levels of Future Housing Development

2.19 The Council's housing requirement is defined within Strategic Policy 3 and is proposed at 18,920 dwellings. This equates to an annual district requirement of 946 dwellings per annum.

2.20 It is understood that this housing requirement figure now reflects the Council's latest affordability ratio (published in March 2022). This affordability ratio showed a worsening affordability gap when compared to the figures published in March 2021. It is welcomed that this latest evidence base has been adopted in the preparation of this policy, therefore aligning with Paragraph 31 of the NPPF requirement all policies to be underpinned by relevant and up-to-date evidence.

2.21 Should the Council's affordability position change between this Draft LP Consultation document and adoption of the Draft LP, this should be reflected in the overall housing requirement accordingly. This would ensure that this part of the policy is sound and underpinned by an up-to-date evidence base.

2.22 The Council's evidence base suggests that there is currently no unmet identified need within neighbouring authorities, however, neighbouring Torbay have suggested that they will not be delivering their districts' housing need identified by the Government's standard methodology. Should there be an unmet housing need arising from Torbay, there may be a requirement for East Devon to accommodate this unmet need under its 'duty to cooperate'.

2.23 The policy also suggests that the Council will be over allocating by 10% beyond their housing requirement to provide housing supply flexibility in the District. However, there is a conflict within the policy's supporting text noting that Paragraph 3.17 suggests that the current over-supply within the Draft LP is nearer 8%. It is understood that the Council have included a windfall allowance of 2,335 dwellings (Strategic Policy 2), however it is unclear whether this has been included within the 8% oversupply, with the supporting policy text (Paragraph 3.17) simply suggesting that the 20,441 dwellings (with 8% over-supply) in the plan period has been calculated "*from the supply categories we [the Council] count towards meeting our [the Council's] requirement plus headroom*".

- 2.24 We have significant concerns regarding the Council's over-allocation of 8% (or indeed 10% as per the policy wording) and do not consider this percentage to be significant enough to ensure the consistent delivery of homes through the Draft LP period. This is particularly pertinent noting the reliance of circa. 12% of their housing delivery to be secured through the future new town (Council's Housing Need, Supply and Requirement Interim Paper, Table 1; 2022).
- 2.25 We consider that the oversupply of allocations should be nearer 20%, which would ensure the consistent delivery of homes throughout the Draft LP period. This should include the allocation of land at Addlepool Farm.
- 2.26 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), local centre, land for a 2-form entry primary school (2.4ha), allotments, sports pitches and public open space.
- 2.27 One of the key benefits to the scheme relates to its delivery. The site lies entirely within single ownership and is within the control of Vistry, the largest housebuilder in the UK by number of dwellings completed annually, who will be able to deliver the scheme in the short to medium term.
- 2.28 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.

Strategic Policy 6 - Developments inside settlement boundaries

- 2.29 Whilst we do not dispute the principle of this policy, at present, we are concerned by the current policy wording which appears to restrict and discourage Neighbourhood Plans from allocating sites outside of the settlement boundary.
- 2.30 Housing numbers within the Council's strategic policies and housing distribution should not represent a ceiling to growth. 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)³.
- 2.31 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.
- 2.32 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 60).

³ PPG Paragraph: 009 Reference ID: 41-009-20190509

Chapter 5 - Future growth and development on the western side of East Devon

Strategic Policy 8 – Development of a second new town east of Exeter

- 2.33 The allocation of a further 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.
- 2.34 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 2,500 dwellings within the Draft LP period in the absence of a housing trajectory evidence and details of how the new town will be delivered.
- 2.35 The Strategy 8 policy text states:
- “Developments shall be developed in a phased and co-ordinated manner alongside the required infrastructure and in accordance with parameter plans for the new town which will be developed in partnership with the developers and the community.”*
- 2.36 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).
- 2.37 As set out in our response to Strategy 2, 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.
- 2.38 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 figure and additional sites should be allocated across East Devon to ensure the consistent delivery of homes throughout the Draft LP period.
- 2.39 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.
- 2.40 In addition to the delivery of 700 homes (including approximately 245 affordable homes), local centre and land for an educational facility, the development will also provide 17.45ha of new public open space in the form of sports pitches, recreational routes, community allotment or orchard, which could include a “pick your own” space to encourage informal recreation.

Chapter 7 – Tackling the climate emergency and responding to climate change

Strategic Policy 28 – Net Zero Carbon Development

- 2.41 We support the Council's declaration of a climate emergency and agree that there is a need for a policy which requires new developments to respond to, and mitigate, the effects of climate change. We have concerns, however, with regards to the additional requirements for new developments sought through this Strategic Policy, which are beyond the obligations of existing legislation and regulations. We question whether the requirement for new development to deliver net-zero carbon dwellings is supported by a robust evidence base and is justified.
- 2.42 The evidence which supports this policy includes the Low Carbon and Climate Change Evidence Base for the Greater Exeter Strategic Plan, which is greater than 2 years old. Moreover, the evidence is not specific to East Devon and refers to the previous Greater Exeter Strategic Plan which has been withdrawn. We do not consider that this evidence base is therefore robust, as required by the NPPF (Paragraph 31; 2021).
- 2.43 The policy requirements also go beyond the existing requirements of Part L building regulations (which require a 31% reduction in CO2 emissions for new developments) and the Future Homes Standard requirements of 75% reduction in CO2 emissions beyond homes delivered under the old regulations.
- 2.44 We also raise concerns regarding supporting text Paragraph 7.6, which states that there may be a future requirement for 10% of buildings on major developments to send energy performance and carbon emissions data to the local planning authority for a period of 5 years. It should not be the developer's responsibility to coordinate and submit monitoring information following development of the site, particularly when this monitoring relates to the carbon emissions of particular homes.

Strategic Policy 33 - Heat Networks

- 2.45 Strategic Policy 33 proposes all major developments within 1km of an existing heat network to be connected or provide a new heat network for proposals over 1,200 homes where no heat network currently exists.
- 2.46 Addlepool Village is proposed to accommodate approximately 700 homes, which falls below this threshold, and therefore it is not anticipated that a heat network would be required to be delivered as part of this development.

Strategic Policy 35 – Flooding

- 2.47 Whilst we do not object to the principle of this policy, however, its content appears to repeat existing legislation and does not appear to be specific to East Devon. As currently worded, it would therefore not align with National Planning Policy and specifically Paragraph 16.f, as it unnecessarily duplicates other policies / requirements.

Strategic Policy 39 - Housing to address needs

- 2.48 We support the principle of Strategic Policy 39 and the need for new developments and housing to meet existing needs. We also welcome the recognition that local market evidence and sales information 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. This would also appear to provide some level of flexibility for the market to inform the types of dwellings that should be delivered on development sites.
- 2.49 We question whether the requirement for provision of serviced plots (for self-build/custom-build) to be delivered on all new developments is justified. It should be recognised that self-build and custom-build customers often have specific criteria, particularly in terms of locational requirements. Often, the provision of serviced plots on larger schemes is not desirable for self-build and custom-build customers. In such instances where there is no demand, the developer should not be penalised for not delivering specialised dwellings on new developments.
- 2.50 To ensure that the policy is justified, 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.

Policy 40 - Affordable Housing

- 2.51 We agree with the increase in affordable housing requirement on sites of 10 or more dwellings to 35% and acknowledge that this will assist in East Devon addressing their worsening affordability gap.
- 2.52 In accordance with this 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 in Devon; Paragraph 8.13). The affordable housing dwellings at Addlepool Village will be tenure blind and evenly distributed across the site, in accordance with the requirements of this Policy (criterion 4d).
- 2.53 We raise concerns in respect of the prescriptive nature of Table 1, which provides a tenure breakdown for affordable housing to be applied to all developments. It is our view that there needs to be a level of flexibility in the policy wording to recognise that local market information can provide a useful indicator for informing appropriate tenure breakdown, beyond that set out within the District wide housing needs assessment.
- 2.54 Similarly, we raise concerns regarding the prescriptive nature of Criterion 4, which stipulates a mix of property sizes and types based on the District wide housing need assessment. We do not dispute that, at present, the LHNA (2022) remains the most up to date evidence base, however, it should be noted that local market information can provide a useful indicator to inform property sizes and types.

- 2.55 At present, it is not considered that the policy is sufficiently flexible and therefore does not accord with Paragraph 82d) of the NPPF (2021) which requires planning policies to be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances.
- 2.56 To ensure that this policy is sound, the Council should provide greater flexibility and allow developers to depart from the tables set out within Policy 40 where this is robustly evidenced. The prescribed tenure mix set out within Policy 40 should be used as a guidance and starting point only.

Policy 41 - Housing to meet the needs of older people

- 2.57 Policy 41 relates to specialist housing for older people. We agree 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, the policy requirements are not clear and we propose that amendments are made to rectify this.
- 2.58 Criterion 4 suggests that suitable locations for specialist older person accommodation will be at “settlements in tiers 1-4 of the settlement hierarchy and where the site is **within 400m** walking distance of local shops **and** easily accessible by walking or by public transport to town centres and to health, care and community facilities” [Own Emphasis]. Criterion 6 however, assumes that (subject to viability) “**all** development proposals for 200 or more dwellings will include at least 20% of those dwellings on-site as specialist older person dwellings as C3 dwellings or C2 equivalents”.
- 2.59 The policy therefore does not align and Criterion 6 should be reworded to recognise that older persons’ units will be required where there is up to date evidence, subject to viability and in locations defined with Clause 4.
- 2.60 As currently worded the policy is not effective or justified and therefore not sound as it will lead to a lack of clarity for the decision maker, applicants and local community.
- 2.61 Whilst Addlepool Village is not located within tiers 1-4, the development 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.

Policy 43 - Market housing mix

- 2.62 We support Policy 43 which acknowledges that there are instances where the proposed housing mix set out within the Policy can be departed from, including in instances where more up to date and relevant local housing need is available, which could be informed by up-to-date sales and market information.

Policy 44 – Self-Build and Custom Build Housing

- 2.63 At present, we do not consider this policy to provide sufficient flexibility.

- 2.64 Whilst we do not dispute that there is demand for self-build and custom-build plots, it should be acknowledged that self-build and custom-build customers often have specific criteria in respect of their locational requirements.
- 2.65 As set out in our response to Strategic Policy 39, often the provision of serviced plots on larger schemes is not desirable for self-build and custom-build customers. In such instances where there is no demand, the developer should not be penalised for not delivering specialised dwellings on new developments.
- 2.66 Additional flexibility should be included within the policy text to reflect this.
- 2.67 We are also concerned by the extensive marketing period required within the policy. The policy requires self-build and custom-build plots to be marketed for at least 24 months from being fully serviced and developable before being made available to the open market.
- 2.68 It is not uncommon for some developments to have completed on sites within a 24-month period. As such, in accordance with the requirements of this policy, developers may have completed on sites and need to subsequently return to the development to complete the build should the custom-build and self-build plots not be sold. This is not considered to be an effective approach and would not be sustainable for house builders.
- 2.69 It is our view that a marketing period of 12 months is more appropriate and would ensure that the plots are being marketed for an adequate period, whilst also ensuring that, should there not be demand for the plots, they can be developed for market housing whilst the house builder and construction team are still on site. To ensure that the policy is effective, it is recommended that this amendment is adopted.

Chapter 10. Designing beautiful and healthy spaces and buildings

Policy 62 – Design and Local Distinctiveness

- 2.70 We support the majority of criteria within Policy 62 and recognise the need to ensure that new development is of high quality design and locally distinctive.
- 2.71 We suggest there is a need for some minor amendments to Criterion 2 which, at present, assumes that the development can secure the management of waste in accordance with the waste hierarchy. Whilst the developer can put measures in place to promote the management of waste in accordance with the waste hierarchy, it is not considered possible for the developer to ensure that future occupiers adopt sustainable waste disposal measures, including to reduce, reuse, recycle, recovery, and disposal.
- 2.72 To ensure that the policy is effective, we recommend that Criterion 2 is amended to reference that the development should include measures to promote the management of waste.

Policy 63 – Housing Density and Efficient Use of Land

- 2.73 We support Policy 63 and the need for developments to make effective use of land whilst also responding to the local vernacular, which would appear to accord with the NPPF (2021) particularly Chapter 11 which relates to making effective use of land.

Chapter 11. Prioritising Sustainable travel and providing the transport and communications facilities we need

Strategic Policy 65 – Walking, cycling, and public transport

- 2.74 We support the promotion of the 20-minute neighbourhood concept, which is promoted through this policy.
- 2.75 Addlepool Village accords with the 20-minute neighbourhood concept as it will promote active modes of transport (including walking, cycling and the use of public transport). The proposals will include on-site facilities, including a primary school, local centre and village green. The design of the new village will prioritise cyclists and pedestrians to encourage modal shift.

Policy 67 – Travel Plans, Transport Statements, Transport Assessments

- 2.76 We support Policy 67 and consider this to align with the NPPF (2021), particularly Paragraph 113 which states that all developments that will generate significant amounts of movement should be required to provide a travel plan.

Policy 68 – Parking standards

- 2.77 We agree with the principle of needing to provide a policy relating to car parking and note that car parking requirements in East Devon are provided at a District level.
- 2.78 We consider that the policy wording is not effective. The policy stipulates that new developments should provide an average of not less than 1.6 car parking spaces per dwelling. The policy would provide a greater amount of clarity to the decision maker, applicants and local community if more detailed parking standards were provided, which provided a suggested bedroom tenure/car parking spaces breakdown.

Policy 70 – Safe vehicular access to sites

- 2.79 Whilst we do not object to the inclusion of Policy 70, it appears to unnecessarily reiterate the NPPF (2021), particularly paragraph 110b).

Chapter 12. Caring for our outstanding landscape

Policy 74 – Landscape Features

- 2.80 We agree with the principle of Policy 74 and the need to protect and enhance features that contribute to the nature and quality of East Devon's landscapes.

- 2.81 However, we do not think the policy, as currently worded, to be effective due to the inclusion of part a) which states that there is a need to protect all trees. This would appear to conflict with Policy 85 of the Draft LP, which prioritises the protection of ancient woodland, veteran trees and irreplaceable habitats, as opposed to needing to protect all trees.
- 2.82 The Draft LP should recognise that development may cause an adverse effect on trees, however, this should not prevent development from being permitted. There should be an understanding that, in some instances, tree removal can be beneficial to the wider ecological network. Mitigation can also result in an overall betterment, whereby specific species can be selected for tree planting.
- 2.83 To ensure this policy is effective, it is recommended that part a) is removed.

Policy 77 – Areas of Strategic Visual Importance

- 2.84 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.

Policy 82 – Control of Pollution

- 2.85 We support the principle of this policy, which states that development will not be granted where it would result in an unacceptable level of pollution, which would appear to align with the NPPF (Paragraph 174e; 2021).
- 2.86 Whilst new development should seek to help improve local environmental conditions, it is not a development's responsibility to rectify existing pollution issues. This should be acknowledged in the policy wording.

Policy 83 – Development on High Quality Agricultural Land

- 2.87 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.
- 2.88 The policy states 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. 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.
- 2.89 The policy is not effective or justified and therefore not sound as it will lead to a lack of clarity for the decision maker, applicants and local community.

Chapter 13. Protecting and enhancing our outstanding biodiversity and geodiversity

- 2.90 It is agreed that there is a need to protect internationally and nationally important wildlife sites and locally important sites.
- 2.91 A number of RAMSAR, SSSI and SPAs exist across East Devon, some of which are in proximity to the western part of the District, which is considered to be the most appropriate location for accommodating new development.
- 2.92 In such instances, subject to the development demonstrating that sufficient open space is provided on site to offset any potential recreational impact on these sites and appropriate mitigation can be secured, the development should not be refused.
- 2.93 Land at Addlepool Farm is located approximately 0.5km from the Exe Estuary RAMSAR, SSSI and SPA. The site has been subject to a PEA, which has found the site to be dominated by uniform agricultural land of low ecological value. The proposed development will include approximately 17.45ha of public open space which, together with financial contributions towards improved access management, would mitigate any potential recreational impacts that may incur from an increase in residents.
- 2.94 The provision of 17.45ha of open space would also be available to existing surrounding residents and would therefore also assist in addressing existing recreational pressures on these sites.

Policy 85 – Protection of irreplaceable habitats and important features

- 2.95 We support the principle of Policy 85 and the need to protect irreplaceable habitats.
- 2.96 The policy refers to the need to retain important hedgerows (defined by the Hedgerow Regulations 1997 as hedgerows dated 30 years or more [Regulation 4; a]). It should be acknowledged that there are instances where hedgerow removal cannot be avoided, for example when needing to implement an access into a development site. In such instances, where it has been demonstrated that the loss of the hedgerow is both justified and mitigated, development should not be refused.

Policy 86 – Habitats Regulations Assessment

- 2.97 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.
- 2.98 It is understood that the SEDESMS is currently undergoing a review and will review the suitability of the existing SANG requirements. The Draft LP policy suggests that any changes will be incorporated through the Draft LP and this policy text may be updated. Until such amendments are made it is unclear whether this policy is sound.

Policy 87 – Biodiversity Net Gain

- 2.99 We support the principle of a policy within the Draft LP that relates to the need to provide Biodiversity Net Gain on new developments.
- 2.100 However, we do not consider that Policy 87 is sound as we consider that it is not supported by a robust evidence base as required by the NPPF (2021). The policy also does not appear to be supported by a robust viability assessment as required by Paragraph 58 of the NPPF (2021).
- 2.101 The policy requires all new developments to provide a biodiversity net gain of 20%. This percentage is significantly higher than that required under the Environmental Bill (2021). It should be noted that the element of the Environmental Bill that relates to the provision of biodiversity net gain on new developments is not due to come into force until November 2023 (following a 24 month transitional period from the Bill being passed).
- 2.102 In seeking to justify the policy requirement, EDDC are relying on the DEFRA Evidence Base and Impact Assessment Report (2017), which is five years' old and is not specific to the District. The Report claims that increasing the net gain percentage to 20% from 10% results in an increase in initial biodiversity net gain delivery cost of ~18%, and a corresponding 29% increase in the area (ha) of habitats created (Draft LP supporting text 13.43).
- 2.103 We question whether the 20% requirement set out within this policy has been viability tested.
- 2.104 The policy also appears to rely on evidence base that is being used to support Swale Borough Council's emerging Local Plan, with reference in the Draft LP to Swale's use of the DEFRA Viability Study and claims that "10% BNG costs developers approximately £948/dwelling, and 20% costs approximately £180/dwelling more".
- 2.105 We do not consider that it is reliable to reference other LPAs within the Draft LP, particularly noting that Swale does not adjoin East Devon and the market and viability work undertaken by Swale is likely to differ to the local market within East Devon. Notwithstanding this, it should be noted that Swale's emerging Local Plan is still in its preliminary stages and has not yet been examined by an Inspector. It therefore cannot be assumed that Swale's evidence base is robust.
- 2.106 We have significant concerns regarding the need for all new developments to deliver 20% biodiversity net gain, which would appear is not justified or underpinned by a robust evidence base and therefore cannot be considered sound.

Strategic Policy 88 – Local Nature Recovery Strategy and Nature Recovery Network

- 2.107 It is understood that the Local Nature Recovery Strategy is currently under review. Until such time that the mapping areas are fixed, it is not possible to comments on the soundness of this policy.

Policy 89 – Ecological Impact Assessment

- 2.108 We do not dispute the need for Ecological Impact Assessments and agree that such assessments should be carried out in accordance with CIEEM guidelines.
- 2.109 We do not agree with the policy text which states that ecology surveys cannot be conditioned. There may be instances, particularly in relation to large scale planning applications, whereby the length of time between application submission and determination may result in some ecological surveys becoming out of date. In such instances, it is considered appropriate that such survey updates can be secured by way of planning condition.

Policy 92 – Tree policy

- 2.110 Policy 92 refers to a Tree Strategy that does not yet exist. It is understood that the future Tree Strategy will inform future redrafting of this Policy. Until such time that the Tree Strategy is published, it is not considered that this policy can be properly assessed.

Chapter 14. Open space and sports and recreation facilities

Policy 97 – Land and buildings for sport, recreation and open space areas in association with development

- 2.111 We support Policy 97 and note that the open space typologies and requirements remain largely the same as those within the adopted Local Plan. It is welcomed that the Council will apply a flexible approach to calculating the open space requirements, which will include a consideration in respect of the existing provision in the parish within which they are proposed.

3. ADDRESSING HOUSING NEEDS AND IDENTIFYING SITES FOR DEVELOPMENT

East Devon Housing and Economic Land Availability Assessment 2022

- 3.1 At present, Chapter 4 of the Draft Local Plan only refers to site assessment work in respect of sites located in Tier 1-4 settlements and states at paragraph 4.3 that *“to date, detailed assessment has not been undertaken of sites on the western edge of East Devon where close to the Exeter City Boundary. Assessment work will be undertaken in the coming months though in this plan we do show suggested allocations”*.
- 3.2 The Draft LP Proposals Map identifies Land at Addlepool Farm as forming part of a second option for a new town. Whilst we fully support this, it is our view that the development of Land at Addlepool Farm can come forward on its own to accommodate a self-sufficient, sustainable, new village on the western edge of East Devon.
- 3.3 The Draft LP states that a final technical HELAA report was considered at the Strategic Planning Committee on 1st November 2022. Land at Addlepool Farm has been promoted through the Council’s Call for Sites process and subsequently assessed through this latest HELAA (dated November 2022). This HELAA report also included a Site Assessment for Land at Addlepool Farm (site reference Clge_37).
- 3.4 This chapter discusses the Council’s site assessment in the context of the Draft LP.

Services and Facilities

- 3.5 The site assessment states 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”*. We fully support this statement and agree that the site is in a sustainable location.
- 3.6 We agree with this summary. 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.
- 3.7 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.

Biodiversity Comments

- 3.8 The biodiversity comments are as follows:

“Several TPOs along parts of southern boundary. Not located within any other known area of biodiversity interest although it is within the Exe Estuary & Pebblebed Heath mitigation zones. At its closest, the site is approx 500m from Exe Estuary SPA & SSSI, and 1750m from Clyst Marshes CWS”.

- 3.9 We agree with the comments provided and can confirm that the site has been subject to 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.
- 3.10 It is also acknowledged 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.
- 3.11 We agree with the site assessment that the site will not have an unacceptable impact on biodiversity.

Heritage Comments

- 3.12 The Site Assessment states:

“Site surrounds but does not include a scheduled monument on Woodbury Road (Animal Pound On Woodbury Road 275M SE Of Church). Open views of site from Grade II listed farm 40m to north. Also views of site from Grade II listed Lady Seawards Primary School, although these are obscured by intervening buildings and trees.”

- 3.13 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.
- 3.14 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.
- 3.15 We agree with the findings of the site assessment, which notes that the site will not have an unacceptable impact on heritage.

Landscaping Comments

- 3.16 The landscape comments are as follows:

“Large site with far reaching views from surrounding rural landscape. Located between Ebford and Clyst St George so limited context of built form. No impact on AONB due to distance. DCA Clyst Lowland Farmlands and part Exe Estuary and Farmlands. LCT Ref 3E. Lowland plains.”

3.17 It should be noted that the site is not located within any statutory or non-statutory 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.

3.18 We support the Council’s assessment that the site will not have an unacceptable impact on landscape.

Flooding/Drainage Comments

3.19 The site assessment provides the following commentary in respect of flooding and drainage:

“There is approx. 0.95 ha of Flood Zone 3 in the northern edge of the site so this will reduce the gross development area and yield. Also, high surface water flood risk in northern edge. Most of site is Grade 3 agricultural land in strategic assessment but western tip of the site is Grade 1”.

3.20 The above assessment is not disputed. The extent of the site allows for all development to be located within Flood Zone 1 along with drainage basins within the low points of both parcels and outside of surface and fluvial flood zones.

3.21 We support the Council’s assessment that the site will not have an unacceptable impact on flooding/land/resources.

Overall Conclusions

3.22 It is welcomed that the HELAA Panel have assessed the site and consider development to be *“probably achievable as housing with a local centre and potentially with additional employment subject to highway drainage mitigation measures and highway/transport assessment”*.

3.23 We fully support this conclusion and agree that development of Land at Addlepool Farm is achievable and would contribute to the Council’s housing delivery and accord with the spatial strategy.

3.24 The Council’s overall comments are provided below, which consider the site can accommodate 554 dwellings.

“Of the 37.902 ha site, 0.95 ha of land is discounted due to either being in Flood risk Zone 3, or for safety reasons such as high voltage power lines or high pressure gas pipelines, or Use Classes C3/Eg/B2/B8 planning commitments. Thus the gross site development area for housing and for employment is approx. 36.952 ha.

HOUSING : Site resubmitted in 2022 as available for housing. Based on the gross site area and after applying the gross to net conversion factor, the site has potential to deliver approx. 554 dwellings (midyield). The lower of the mid yield and the site promoter's yield would have the potential for 554 dwellings. Sites Clge_37 and Clge_28 wholly overlap, so to avoid double counting Clge_28 is counted as NIL. The site Clge_37 (GDA) passes Stages A and B Suitability Assessment and Achievability and therefore for the trajectory the net site capacity is 554 dwellings.

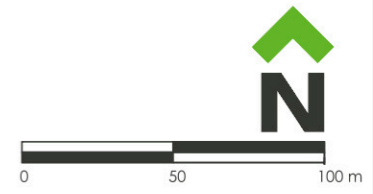
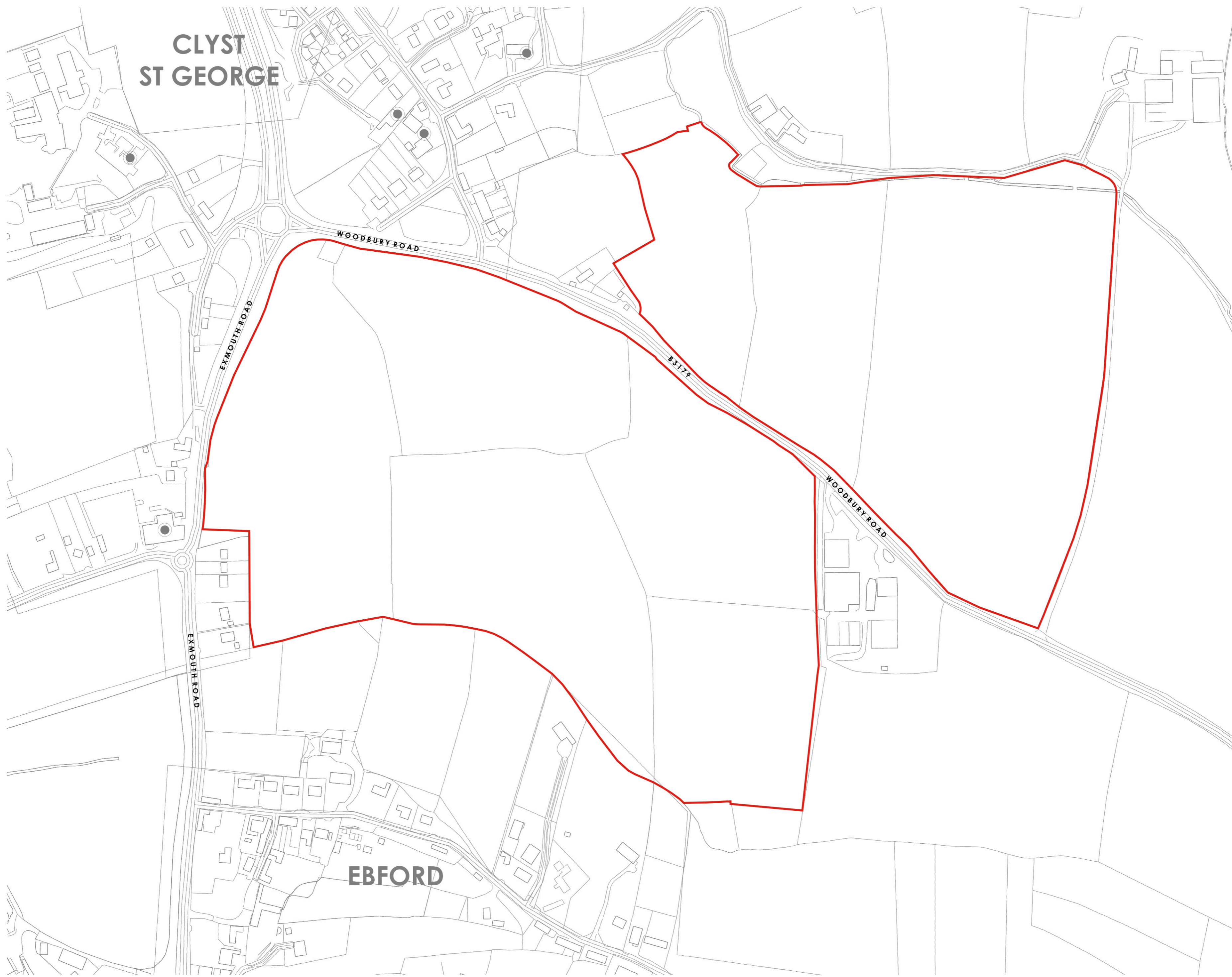
EMPLOYMENT : The site is submitted as available for employment (office/retail) - but the submission makes the site available as a comprehensively planned village (predominantly housing) so therefore the site capacity for employment is limited to that in the proposed local centre. This might equate to estimated 1.0 ha based on area shown by the masterplan map notation.

RETAIL : The submission proposes the site is part of a comprehensively planned village with retail and/or health facility in the form of a local centre. This is included in the employment assessment, so not assessed again.”

- 3.25 It is also welcomed that the site has been included within the HELAA Trajectory (shown at Appendix I) and considered able to accommodate 425 dwellings in 2027-2032 and 129 2032-2037.
- 3.26 The development of Addlepool Farm and its location along the western edge of East Devon would fully align with the Council's spatial strategy. The Council's site assessment supports the development of the site. The site's identification as an emerging allocation within the Council's Draft LP would ensure the consistent delivery of homes throughout the Draft LP period.
- 3.27 It is considered that the evidence supports the allocation of land at Addlepool Farm for residential development within the Draft LP, as a sustainable new self-contained village.

APPENDIX ONE – SITE LOCATION PLAN

CLYST
ST GEORGE



 Site Boundary: Aprx. 37.0ha

Rev	Date	By	Description
A	09.05.22	JC	Minor Red Line Amendment

CSA
environmental

Dixies Barns, High Street,
Ashwell, Hertfordshire SG7 5NT

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Project Land at Addlepool Farm
Clyst St George

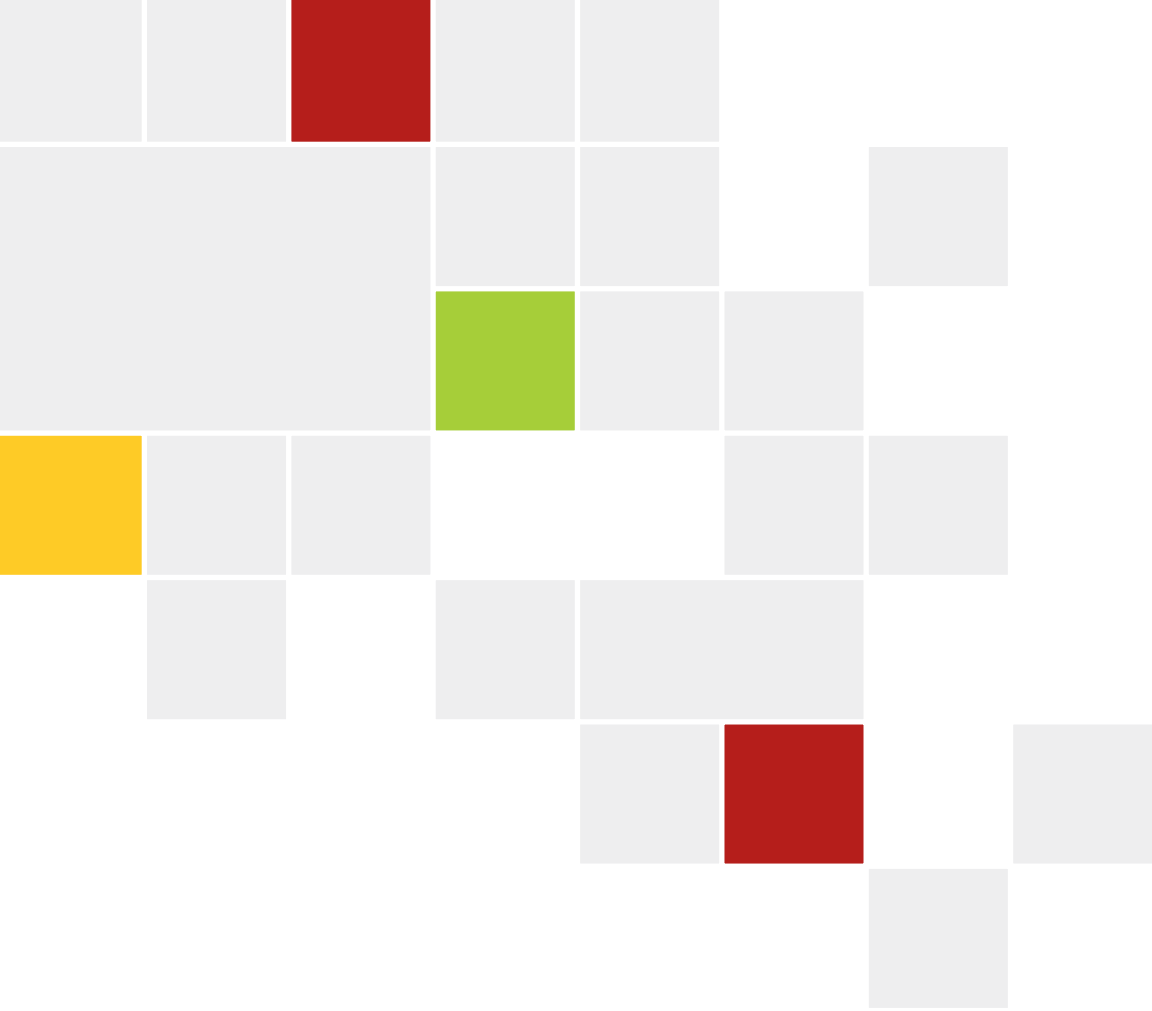
Title Site Location Plan

Client Vistry Group

Scale 1:2500 @ A2 Drawn SM

Date March 2022 Checked JC

Drawing No. CSA/4927/107 Rev A



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