

## **Whimble Parish Council Consultation Response to the EDDC Emerging Local Plan consultation.**

Specifically for site Whim\_08a Land west of Bramley Gardens.

The following response has been drafted using the headings on the EDDC Commonplace application.

### **Question 1: To which part of the Development in the Towns and Villages Chapter does your representation relate?**

Whimble Parish Council Response: Policy

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

Whimble Parish Council Response: SD29: Strategic Allocations at Whimble

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

Whimble Parish Council Response: Yes

### **Questions 2(a), 2(b) and 2(c)**

Whimble Parish Council response: No comments to make

### **Question 3: Do you consider that this part of the Development in the Towns and Villages chapter is sound?**

Whimble Parish Council response: No

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

Whimble Parish Council response:

Whimble Parish Council is responding to, and challenging policy SD29: Strategic Allocations in Whimble, particularly to the allocation of Whim\_08a (Land west of Bramley Gardens) site in the EDDC Emerging Local Plan.

The objection is on the grounds of soundness in that the allocation and policy is not based on solid evidence.

The EDDC Strategic Planning Committee considered the Whimble Site Selection Report at a meeting on 1 October 2024.

Professional planning officers identified and assessed the potential sites in Whimble and using their professional judgement, backed up with sound evidence recommended to Members whether to allocate the site or not.

In the case of Whim\_08 site, officers recommended that the site was not allocated for the following reasons:

- Scale of development incompatible with spatial strategy.

- Site lacks safe and convenient pedestrian access to services and facilities in the village.
- The site forms part of the 'Green Wedge' between Whimble and Cranbrook.
- Forms an important part of the very attractive rural landscape setting for the settlement.
- Potential impact on unconfirmed wildlife site.
- Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation.

In the earlier phases on consultation, Planning Officers held a Public Consultation event at the Victory Hall, Whimble. This site was never considered as being appropriate for development at that event and, in fact, when local residents asked the question, the Officers in attendance vehemently denied that it was a possibility for consideration.

At the meeting on 1 October 2024, Members of the committee voted to go with the officer recommendation and not allocate the site. However, at the Strategic Planning Committee meeting on 1 November 2024 Members did a complete u turn and decided to allocate part of the site, contrary to Officer recommendation.

There was no justification or reason given as to why this site was picked above any others in Whimble or other sites in the east Devon area. Also no additional work appears to have been completed by officers to assess the risks relating to this site before allocating it.

This gives the appearance of the Strategic Planning Committee having a knee jerk reaction to needing to allocate additional houses across the district without considering a fully worked up proposal or sound justification (based on evidence and facts), as to why the site should be allocated (partially or otherwise).

This site allocation report also considers 'If whole site is not suitable for allocation, could a smaller part be allocated?' The view of the professional planning officers was 'No'. Again, this leads Whimble Parish Council to challenge the soundness of any allocation of this site, whether full or partial.

Taking the list of reasons drawn up by officers as to why the site should not be allocated, Whimble Parish Council makes the following comments:

Scale of development incompatible with spatial strategy.

Policy SP01: Spatial Strategy section E states 'Allowing limited development at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimble.'

The EDDC Site Allocation Report for Whimble states 'Whimble is a is a 'Tier 4' settlement, where the draft local pan seeks to promote limited development to meet local needs. The development of up to 180 dwellings on Whim\_08 is considered to be excessively high in relation to the scale of the existing village.'

As part of the work on the Whimble Neighbourhood Plan, the Parish Council commissioned a Housing Needs Survey. The Whimble Parish Housing Needs Report states 'The survey identified a need for at least 4 affordable homes within the next 5 years.'

Whimble Parish Council does not class a total allocation of 83 homes in Whimble to be 'limited development' (Whim\_11 total of 33 homes; Whim\_08a total of 50 homes), especially when the Whimble Housing Needs Report lists a significantly lower figure.

The Parish Council also suggests that the allocation is not sound as it is contrary to EDDC Emerging Local Plan Policy HN01: Housing to address needs, which states 'This will be achieved by providing an appropriate mix of decent, good quality homes which meet identified needs for housing as identified in a neighbourhood plan, local needs assessment or other evidence document over the plan period, at locations consistent with the settlement hierarchy and the spatial strategy.'

In addition to this, there are developments planned in neighbouring areas e.g. Cranbrook. This includes the current Cobdens Expansion of Cranbrook, part of which is still in the Whimble Parish Area, where 1500 houses, a school and a travellers site have already been approved by the Strategic Planning Committee. These sites have a far better infrastructure than Whimble Village so why has the additional housing requirement not been allocated at these sites?

Site lacks safe and convenient pedestrian access to services and facilities in the village.

Access to the site and potential development would be through Bramley Gardens and onto Church Road. Church Road is the main route into the Village and is a narrow and dangerous road.

The section of Church Road nearest to the Square and village shop is single track road with houses either side of the road. There is no pavement along the stretch of Church Road to The Square and School Hill. The Parish Council and Villagers have raised concerns about the volume and speed of traffic on that road.

The Parish Council are so concerned about the volume and speed of traffic along Church Road that it has convened a Community Speed Watch Group to monitor the traffic and speed along that road. The Police confirmed that Church Road is not recommended as a safe route to the Primary School, Village shop, church or railway station.

To access the village shop in the Square and the Primary School in School Hill villagers would have to walk down Church Road which has no pavements. Therefore, there is no safe and convenient pedestrian access to services and facilities in the village.

To ensure safety most people would probably use their car or vehicle to access the village shop or primary school. This is not sustainable and surely would be against

EDDC Emerging Local Plan Policy TR01: prioritising walking, wheeling, cycling and public transport and is also contrary to the EDDC Climate Change aspirations.

The site forms part of the 'Green Wedge' between Whimble and Cranbrook.

The EDDC Emerging Local Plan Policy OL05: Green Wedges states 'Within green wedges, as defined on the Policies Map, development will not be permitted if it would add to existing sporadic or isolated development, damage the individual character or identity of a settlement, or could lead to or encourage settlement coalescence, whether physical, visual, or intrinsic.'

Whimble Parish Council again challenges the soundness of the proposed allocation due to the Green Wedge. The Allocation of this site would potentially damage the individual character or identity of Whimble. This site forms an important part of the very attractive rural landscape setting for the settlement.

This would also lead to settlement coalescence between Whimble and Cranbrook, which is a material planning issue, and clearly demonstrates that this site should not be allocated in the Local Plan. This was the view of the EDDC professional Planning Officers.

Potential impact on unconfirmed wildlife site.

Local residents have stated that this site is a wildlife site which is home to bats, owls, woodpeckers, deer and badgers. Any development of this site would be contrary to EDDC Emerging Local Plan Policy PB03: protection of irreplaceable habitats and important features.

Part of is at risk of flooding and further work would be required to understand the nature and extent of the risk before consideration could be given to allocation.

There is no evidence to suggest that officers have carried out further work relating to the flood risk before consideration was given to a partial allocation.

Therefore, Whimble Parish Council suggests that there is no sound evidence for allocating this site in the EDDC Emerging Local Plan and that it is contrary to Policy AR01: Flooding.

### **Other comments**

The Parish Council and local residents in Whimble have not said that they are against development. But the issue is the size and location of the development.

It is the view of the Parish Council that development would be better placed elsewhere in Whimble, or in Cranbrook or elsewhere in the district where there is appropriate infrastructure.

As set out earlier there is no sound justification as to why the Strategic Planning Committee decided to go against the professional judgement of the Planning Officers and allocated this site in the Emerging Local Plan.

Also, in terms of soundness, the Strategic Planning Committee does not appear to have fully considered a number of other options that could have been chosen.

Whimble Parish Council is looking at Site Allocations as part of the evidence base for its Neighbourhood Plan. The Parish Council is considering a number of sites, which are:

Whim\_03 Land to the south of Grove Road  
Whim\_07 Land south of Broadclyst Road  
Whim\_13 Land north side of Grove Road  
Whim\_18 Land to the east of Church Road  
Whim\_20 Land to the north of Plumtree Lane

The Parish Council's preference would be that a site is allocated to the east of Church Road so that it is nearer to the established infrastructure near the Hand and Pen.

It is appreciated that there are constraints to these sites but the Parish Council challenges that there are constraints with site Whim\_08a, hence why the EDDC professional Planning Officers recommended that the site was not allocated.

It is the view of the Parish Council that further work should be carried out on all of the sites by the professional Planning Officers before any allocation is made in Whimble.

So, in summary, Whimble Parish Council does not feel that the EDDC Emerging Local Plan policy SD29: Strategic Allocations in Whimble is sound, and therefore site Whim\_08a should not be allocated.

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

Whimble Parish Council response:

Whimble Parish Council believes that policy SD29: Strategic Allocations for Whimble, specifically site Whim\_08a is not sound, as the decision to allocate this site went against the solid evidence provided by the professional Planning Officers report and recommendations, without any justification as to why the decision was made to partially allocate the site.

Therefore, Whimble Parish Council and local residents want to see the modification of site Whim\_08a being removed from the EDDC Emerging Local Plan and the homes being allocated elsewhere in the District (outside of Whimble Village), where there is appropriate infrastructure.

**Question 4: Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?**

Whimble Parish Council response: Yes

**Questions 4(a) and 4(b)**

Whimble Parish Council response: No comments to make

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

Whimble Parish Council response: Yes, I wish to participate in hearing session(s)

**Question 6: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.**

Whimble Parish Council response: Whimble Parish Council wishes to participate in the hearing session(s) to challenge the soundness of the allocation of Policy SD29: Strategic Allocations at Whimble, and to represent local residents of Whimble who have also voiced significant concerns and objections.