

## CONSULTATION ON THE DRAFT EAST DEVON LOCAL PLAN 2020 – 2040

### Clyst Honiton Parish Council's Response

#### General

Below is a series of comments on the draft Local Plan from Clyst Honiton Parish Council.

The parish council has considered the plan in detail, in particular the parts relating to Clyst Honiton directly. In short, the proposed new town is largely on land currently within the Clyst Honiton Parish boundary so there is naturally a focus on this.

Planners will be aware that the emerging Clyst Honiton Neighbourhood Plan (CHNP) is currently at the Reg. 14 consultation stage, accompanied by the Clyst Honiton Neighbourhood Development Order (CHNDO). The CHNDO will, assuming it emerges in its current form, provide planning permission for around 50 homes alongside a 10-unit small business site and a community hall. When the homes are built, this will obviously contribute to the windfall numbers within the housing supply totals.

At a time of housing & climate crises it is important that the East Devon District Local Plan fully addresses solutions to these at the same time as delivering all other elements of the plan. Underlying the comments below, there are a number of basic matters that the parish council believes should provide golden threads with which to pull the plan together. The parish council does not believe that the draft plan as written provides this, although there are further stages in the process at which the ideas could emerge. The suggestions are as follows:

#### In General

- a) Whilst it is aware that planners have to work within guidelines for the production of the Local Plan, the belief is that references to **affordable housing** are too generic and that policies should focus more on truly affordable or social rent dwellings. It is clear that in rural areas there is a real problem in maintaining the integrity of communities because housing in these places has become very expensive,

#### Clyst Honiton Problems

##### Village Identity

- b) The development of the **new town** will materially affect Clyst Honiton village, which is in danger of losing its identity, one of the worries expressed by the community in surveys carried out for the Neighbourhood Plan.
- c) Thought needs to be given to how the new town is going to relate to the existing parish, how its future boundaries are going to be laid out and what benefits could come as a result of the changes.

##### Sewage Disposal

- d) The River Clyst runs through Clyst Honiton and the sewage pumping station was installed to accommodate waste from Cranbrook when it was built.
- e) This facility is now overwhelmed with regular discharges of raw sewage being allowed to pollute the river. This does not bode well for the integrity of the Clyst Valley Park area. This

must be resolved now, as further housing is proposed with the Cranbrook extension and more major development being put forward as part of the original plan.

- f) The matters that need addressing are many-fold because the current discharges are being blamed by SWW on heavy rainfall overwhelming the system. This is, to say the least disingenuous. The real cause of the overwhelming of the system is a lack of investment in old inadequate infrastructure.
- g) The concept of the sewage underground pipework is that it is water-tight and discrete from the groundwater conditions, meaning that the whole area could be flooded but the sewage system would remain unaffected and would contain just sewage. This however relies on the integrity of the sewage underground infrastructure and when this is compromised floodwater enters and the overwhelming happens.
- h) There has therefore been a need to maintain to repair or replace the infrastructure from the new housing at Cranbrook to the pumping station at Clyst Honiton which has not been done. The problem will therefore not go away but will indeed be worse once the Cranbrook extension is undertaken and also potentially other developments in the vicinity of the village proposed in the new plan.
- i) In addition, the pumping station was designed and installed for the original Cranbrook plans which have expanded and changed since then. With all the other development feeding into the same pumping station there has to be the question of whether it is now fit for purpose.
- j) This is not a problem unique to Clyst Honiton but has been reported by other parishes all the way down to Countess Wear and beyond.
- k) Further development anywhere near this problem needs to be provided for without SWW being in denial about the inadequacies of the current infrastructure.
- l) This also highlights a distinction between the elements of 'infrastructure' that are provided by distinguishing those things that should be provided eventually to avoid future problems as opposed to those that have to be provided before the housing is built. Sewage, Water, Electricity and Telephone/Broadband facilities have to be provided first, whilst highways and health can be provided later.

## **New Town**

- m) Clyst Honiton Parish Council is not objecting to the principle of the new town proposal, although it believes that the provision of 2,500 within the proposed plan period is optimistic and should not be relied upon. 2030 is only 7 years away and will be nearer by the time the Local Plan is in place.
- n) The inclusion of the new town in the Local Plan is a chance for planners to get ahead of the curve and not let developers determine what is provided when, as appears to have been the case with Cranbrook.
- o) It is assumed that there will be a **Masterplan** produced for the overall site, which should include a number of principles designed to make this a better place to live. Clyst Honiton Parish Council would like to be able to contribute to the production of such a plan, given that a good proportion of its area is within the parish boundary.
- p) The masterplan should use **Garden Town** principles to ensure that, although it is going to an urban environment, it feels like it has been planned with future residents in mind.
- q) Green maximisation – the Local Plan should be setting out policies that not only look to fit in with the EDDC Green/Carbon Zero aspirations but should be looking to ensure they are delivered.
- r) An example is that all buildings should meet Passivhaus standards.

- s) There should be a biodiverse blueprints to be adhered to, not just random open spaces determined by developers.
- t) These should contain ecological corridors for wildlife to thrive and expand into rather than just trying to prove, usually falsely, that development will not just make things worse.
- u) Where possible, energy sources should look to be wind or solar powered – and example is road signs and lighting to have PV facilities powering them.
- v) All dwellings should be home-working friendly and where possible earmark an office area rather than just kitchen, dining room etc.

### **This Submission**

The analysis below tries to apply some of these principles to the draft policies in the Local Plan with the Clyst Honiton comments in boxes under each policy description. There is no attempt to comment on all of the policies as some do not apply to Clyst Honiton and some are agreed with without comment, This is a genuine attempt to have a conversation at an early stage of production in the hope that it helps.

Rob Martin

Clerk to Clyst Honiton Parish Council

13<sup>th</sup> January 2023

## **POLICY CONSIDERATIONS**

### **Strategic Policy 1– Spatial Strategy**

Clyst Honiton Parish Council is at the centre of the proposed area for the new town. It has decided that, rather than oppose the development of this town, it wants to work with the District Council to see the opportunity to improve the local facilities and to ensure that the development works to the benefit of local people.

### **Strategic Policy 2– Housing distribution**

This distribution is largely determined by the availability of deliverable land. A large amount of land was put forward under the 'Call for Sites' in the West End of the district, which has raised the possibility of building a second new town with 2,500 units being allocated within the period of the proposed plan and a further 5,500 beyond that. With the experience of Cranbrook it is clear that achieving the 2,500 in the period between 2030 and 2040 will be a challenge and this might not be met for many reasons.

With the distribution of the allocations, other than the new town, resulting in a large number at the West End (9,851) the need for major infrastructure improvements must not be ignored.

The current problems experienced by Clyst Honiton residents relate to two main problems which will be exacerbated by more development. These are the problem of sewage disposal and treatment and the second being blocked highways.

As experienced by Clyst Honiton residents, the current sewage system does not work well currently with numerous overflows of untreated sewage into the River Clyst from the pumping station in the village, an experience shared by all parishes between there and the Exe estuary. The main problem seems to be that the underground infrastructure has not been improved and that rainwater enters and floods the sewage pipes, inundating the system. This should not happen because the principle should be that the sewage infrastructure should be sealed from groundwater and rainwater. The existing pipework is likely to be Victorian and compromised and has to be replaced before more substantial development takes place.

From the highway perspective, the local roads need to be improved before a huge number of extra vehicles are introduced, particularly at the major junctions. An example will be at the roundabout at the Clyst St Mary junction of the A3052 and the Exmouth road which is already a bottleneck without the potential for several thousand more dwellings accessing the Sidmouth Road, as well as increasing the vehicles going to Exmouth.

### **Strategic Policy 3- Levels of future housing development**

The grand total of dwellings to be provided over the plan period is substantial and challenging for the District Council to aim for. Although one could question the need for calculations overall, experience shows that the methodology used is nationally determined.

and variations to this would no doubt be challenged by developers and/or the Planning Inspectorate. It is therefore a question of where in the District the housing allocations are made.

Other District Councils have taken the Michael Gove statements that statutory housing numbers will not be enforced as being a reason for putting the preparation of their Local Plans on hold, but how this would affect the individual applications for non-allocated land applications, particularly those for which appeals have been made is unclear. The fact that this contradicts the other point in his message that up to date Local Plans do not have to have regard for a 5-year list causes confusion. It still seems sensible to prepare the Plan, but maybe some flexibility on the overall number is possible. It all seems like making policy up on-the-hoof to suit political needs and could just as easily be changed back again.

Given the AONB and other restrictions in the rest of the district it is understood that the allocation of a new town area is attractive, although there is a danger that putting all the eggs in one basket will be problematic if there are delays in planning permission being granted in time.

The real danger is that the housing trajectory being proposed might not be met, with a distinct possibility that the District Council will not have a 5-year allocation in place, as is the case currently, leaving developers in the position, for a good deal of the plan period, in charge of what gets built where. For this reason, it would probably be a good idea to have a secondary set of potential allocations in hand to account for the possibility that this might occur. It is known from experience that Inspectors look with a very critical eye at the likelihood of the trajectory being flawed in this way.

### **Preferred Option for the approach to economic growth**

It is clear that the approach to economic growth has worked to some extent in the past because of the businesses now in the west end of the district. The main problem is that the infrastructure in place is not up to the job. One of the attractions of the west end being used for economic growth purposes is its proximity to the road and public transport networks but the building of more industrial and commercial units is in danger of killing the Golden Egg Goose. The experience of the current situation is that rather than attracting businesses to provide jobs for the people in the new houses, these houses are too expensive for the employees working close by. The result is the double-whammy of people moving to the new houses that have to work in Exeter, or elsewhere, driving into the city whilst the employees of the local businesses go the other way by car, bus or bike.

The new strategy should be matching the type of work being offered with the housing provided, which either means more professional higher paid employers or cheaper housing being provided. It is recognised that this is difficult to achieve where both job provision and housing are demand led, but the plan should look to achieve this. Putting more storage warehouse units on extensive sites will just exacerbate the problems.

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

Rather than just looking at what the current commercial development 'needs' are and reacting solely to this, the aspiration should be to attract much higher value jobs to the area, otherwise the housing/job mismatch will continue to cause further problems as described above.

The experience with Skypark has been to start with high aspirations, as this policy does, but to then water these down to meet 'needs' identified by others. Work needs to be done now to identify businesses eager to come to the area with high value jobs rather than just put things in the plan which are never going to be taken up. The housing and business sides of the plan are equally important and much work seems to go into identifying housing need whereas the business element is done more in hope than expectation.

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

This policy is fine in principle but will be difficult to enforce unless there is a clear plan of what type of employment you want and where it is to go. Experience shows that developers have a method of looking to go for planning permission with areas of land earmarked for businesses for which there is little or no demand. Then, when this is proven they build more housing on the basis that they have to do so for the site to remain 'viable'.

Allowing mixed development can be good in the smaller town/village settlements and provides work alongside housing. The problem, as always, is one of developer profit over what is right and there will be tendency to use the 'viability' arguments to change from what the plan sees and what is provided.

**The fact that the Clyst Honiton Neighbourhood Development Order (NDO) plans are for a site such as this with housing (50), business units (10) and a community facility but that the advice has been to provide it under an NDO rather than allocate and leave to the market is proof of the reluctance of developers to take them on. This project is reliant on the Church Commissioners not insisting on the land market price to even consider making it work.**

### **Strategic Policy 6 – Development inside Settlement Boundaries**

Clyst Honiton Parish Council agrees with the principle behind this policy.

The aim is presumably to allow development of undeveloped land or brownfield sites within the settlement boundary, but what happens in practice is that development proposals are for a change from commercial to housing. Is this policy relevant then, particularly if a Neighbourhood Plan has specifically expressed a wish for this not to happen?

### **Strategic policy 7- Development beyond Settlement Boundaries**

Agreed, but the policy should perhaps require reference to Exception Sites to avoid potential conflict between policies.

**Strategic Policy 8– Development of a second new town east of Exeter Land is allocated, as shown on the Policies Plan, for the development of a new town on the western side of East Devon.**

This should only be done using the experience of Cranbrook, not as an unqualified success because anyone living in or near it knows it is not. One thing that plainly needs to happen is that EDDC needs to be in control of the planning requirements from the outset, not trying to catch up with developers because the plans are not ready. Development needs to be managed tightly.

Experience from other areas of the country suggests that the production of an overall Masterplan, the production of which should include the local parish councils as well as representatives from the potential developers and landowners, provides a basis for the future development.

One way of improving the fell of the new development might be to use ‘Garden Town’ principles to draw up this plan, which every developer would have to comply with when putting forward their applications.

As part of this the development could be made provide Joined-Up ecology to ensure it provides the needs for animals, plants, birds and bats, without leaving this to developers to allow for individually. It is known to be better to provide **Ecology Corridors** within larger site rather than isolated individual open spaces which isolate the flora and fauna from each other.

A crucial element of this proposal would be to ensure what Infrastructure is to be provided and where on the site. Infrastructure falls into two basic categories which are those essential for the building of properties such as sewage, electricity etc, and those that deal with the effects of the properties having been build such as highways, doctors, schooling. It is apparent from the Cranbrook experience that the latter has been concentrated upon at the expense of matters like sewage disposal. This needs to be resolved as part of the Masterplan. There will be reluctance on the part of the water and environment bodies to make a commitment to do this, but development should not be allowed before this is agreed.

The aspiration should be that all housing and or commercial development should be built to Passivhaus standards, or its equivalent at the time. This should not be negotiable as the development is not to be started before 2030 and will still be going in 2060 if the Cranbrook speed of delivery is replicated here. The speed with which the world is finally grasping the need to make homes more energy efficient should inform us of the absolute need to make this a central point of any plan for the future.

The effect of having to provide overall facilities within a complete site rather than one piece of land or the other us often seen as unviable by developers. One aspect of this is that as soon as land is allocated in a Local Plan, the perceived value of the land increases and landowners become ‘greedy’. If there is to be a coordinated planned approach to this new



town, this needs to be managed from the outset – it might mean that the developable land has to be seen as a whole and that the developers work on the whole site as a joint venture rather than as individuals. If we are to improve the way things are done, something has to change.

It goes without saying that all homes and businesses should be enabled for the latest technology, but not restricted to just what is available today – in 20 years' time the world will be operating very differently to today.

Most of these matters are being addressed in the specifications for the Clyst Honiton NDO site because both the parish council and the Church Commissioners are committed to **Build Back Better**, to steal a Covid-related phrase. Clyst Honiton Parish Council's project could be the example of what developers should aim for.

It is important that the Local Plan moves the world forward rather than just reflecting what has happened in the past. Arun District Council wanted to build a Green Ecological Town on the site of Ford Airport some years ago, which did not go ahead because the developers used their significant political weight to maintain that it was not 'viable' to provide all of the infrastructure necessary to make it work. The world has changed now and, whilst there will still be reluctance from developers, it is time to be radical and to start building plans around what the world is going to have to be like in 20 years time.

#### **Strategic policy 9– Development within the Enterprise Zone**

As for the LDO land east of Exeter Airport below.

Better cycle and pedestrian links need to be made with local housing development than have been seen in the past – land ownership can be a problem.

#### **Strategic policy 10– Exeter Science Park**

Agreed

#### **Strategic policy 11– Land north of the Science Park**

Infrastructure is the key. All development in this area needs to have the sewage system improved. This will contribute to further, more extensive raw sewage releases into the local environments.

#### **Strategic policy 12– High quality employment north of Sowton village**



Infrastructure is the key. All development in this area needs to have the sewage system improved. This will contribute to further, more extensive raw sewage releases into the local environments.

### **Strategic policy – Exeter Airport and its future operation and development**

Agreed, but not optimistically.

What happens if Exeter Airport does not flourish? This is a significant site and will be under pressure to stay viable unless changes are made. It is also one of the reasons that the west end is seen as such a good hub, because it adds to the attractiveness for businesses. Without it the whole area could become more of an issue within the plan.

### **Strategic Policy 14– Employment land to the east of airport buildings**

A fairly recent briefing session on this subject was given to the Parish Council, but it was disappointed that, despite a very obvious need to provide a cycle route from Cranbrook directly to the proposed LDO site, it was deemed to be outside of the brief. Thought needs to be given to what is actually required rather than what developers will want to provide.

### **Strategic Policy – Employment land east of the Airport and north of the A30**

A fairly recent briefing session on this subject was given to the Parish Council, but it was disappointed that, despite a very obvious need to provide a cycle route from Cranbrook directly to the proposed LDO site, it was deemed to be outside of the brief. Thought needs to be given to what is actually required rather than what developers will want to provide.

### **Strategic Policy 16– Green infrastructure and the Clyst Valley Regional Park**

Clyst Honiton Parish Council fully supports this policy, but....

This is where the sewage problem is coming home to roost.

There is no doubt that without the currently proposed extensions to Cranbrook and a great deal of allocated business land, both in the existing and proposed plans, there is too much raw sewage material being discharged into the River Clyst at the Clyst Honiton pumping station. This runs contrary to the concept of the Clyst Valley Regional Park and must be addressed. If not, the proposals to develop in Clyst Honiton and further downstream will cause serious health problems both to people and wildlife.

South West Water have to address this as part of the consultations over this plan and produce replacement underground infrastructure and provide new disposal facilities.

### **Strategic Policy 27– Climate Emergency**

Clyst Honiton Parish Council agrees with this direction of travel.

There is a need however for all development policies, both housing and commercial, to reflect what is needed to achieve this. Remember that development proposals agreed in the 2020s will not usually come to fruition for 5 years. There is not much time to make a difference by 2040.

District Heat Networks must be green energy powered, not based on fossil fuels.

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

Aspire to Passivhaus standards for all development, without compromising on the basis of costs

What are other Housing Authorities doing?

This policy sounds lukewarm on the subject, almost as though it is something you would like them to do rather than making it a requirement. The policy needs to be made more robust.

### **Strategic Policy 29– Promoting renewables and zero carbon energy**

Clyst Honiton Parish Council supports the aim of this policy, but does not see it as written to be encouraging. The exceptions are general requirements for all development so why state them in the policy.

### **Strategic Policy 30– Suitable areas for solar energy developments**

Clyst Honiton Parish Council supports the aim of this policy, but does not see it as written to be encouraging. The exceptions are general requirements for all development so why state them in the policy.

### **Strategic Policy 31– Suitable areas for wind energy developments**

Clyst Honiton Parish Council supports the aim of this policy but does not see it as written to

be encouraging. The exceptions are general requirements for all development so why state them in the policy?

### **Strategic Policy – Energy Storage**

Restricting the use of such storage facilities to just East Devon might be seen as not complying with your Duty to Cooperate. It might also be difficult to prove or enforce.

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

These must be green powered only. The Cranbrook system uses carbon fuel which should not be allowed under this plan. Expecting householders in the future to sign up to, and pay for, a heating network they do not see as green is not acceptable.

### **Strategic Policy 34– Embodied carbon**

Agree in principle

### **Strategic Policy 35– Flooding**

Sequential testing looks to only develop the sites with the lower flood risk. This is rarely done properly, if at all. To some extent there is an argument that sequential testing should be done on land before it is allocated in the Local Plan otherwise it will never be something that happens.

What about storage of rainwater for use on sites to provide toilet flushing etc – greywater schemes. Summer droughts are predicted to be on the increase as well as more flooding as the climate warms.

It is believed that the increase in flooding from the river Clyst could be reduced in the rivers Exe and Clyst were properly dredged.

### **Strategic Policy 39- Housing to address needs**

More emphasis needs to be placed on social rent properties for local people At 80% of overheated market rents, 'affordable' rents are still too high for many essential lower paid workers who are even less able to get on the shared ownership route. You need to define key workers.

Whilst the aspirations in this policy are commendable they need to be adhered to, except in very exceptional circumstances. It is a fact that there have been similar aspirations in the current plan to deliver affordable housing which have not delivered the numbers. This will similarly fail if stronger action is not taken with developers. Every 'affordable' home provided by a developer is seen as a loss to them so there is always a drive to push the numbers down, if not out altogether. Look at those authorities who provide a higher number of affordable/social housing and replicate what some of those are doing.

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

There is a case for devising a separate DPD for the subject as the variations are so complicated there is a danger that the Local Plan becomes just about this subject. As mentioned above, having all the detailed requirements here risks losing the point of defining just the delivery rather than the detail.

Concentration on meeting targets for the number of 'affordable' properties being achieved should not take over from what is actually needed. There are many people needing suitable housing being put into inappropriate dwellings and these should not be ignored when measuring the 'need' - Just because they are off the housing list does not mean they do not need something more appropriate.

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

Once again, this focusses on providing open market housing for people who can afford to pay exorbitant prices or rents. It looks good on paper to provide McCarthy Stone type developments, but these are only available to people with substantial pension incomes. There should be a need to provide truly affordable properties for older people, not just those wanting to downsize to release capital.

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

The SPD is precisely what is need for Affordable/Social Housing as well. The only concern is how long such documents will take to prepare and adopt.

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

Developers, as always, will look to provide a housing mix that maximises their profit, so will always look to ignore the identified need. This is why the tendency is for housing estates to be made up of many more large houses than really fits the bill, There are too many caveats in this policy already, before negotiation takes place on viability etc. This tightening up to

make it enforceable.

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

This always seems to be a bit of a trend that is not necessarily supported by needs evidence. Historically, how many self-build plots are actually sold as such?

The question is whether someone working in a low paid job would ever consider this option or whether it is solely for those who could already afford market housing. In what is a crisis in housing supply, is this necessary?

#### **Policy 49– Rural Exception Sites and First Homes Exception Sites**

Affordable Housing DPD needed.

Exception sites in rural villages are very sensitive. Should be aimed at 'Social Rents' and not affordable rents.

#### **Policy 51– Employment development within settlement boundaries**

The problem with having commercial development within a rural settlement boundary is that the road networks are not suitable for heavy vehicles, so it is more likely that proposals will come from developers wanting to set up offices, particularly since the Covid work-from-home revolution. These businesses should be providing employment for local people rather than having more vehicle movements to and from the sites.

#### **Policy 52– Employment development in the countryside**

This policy seems a little confused. Maybe it should start with a statement that Employment Development will not be allowed, other than .....

Again, this is always difficult for planners to be able to define, whereas the Nimby's of this world will always want to say no.

#### **Policy 54– Resisting the loss of Employment sites**

Is this not too restrictive?

There are a number of villages that have had unwanted employment sites for many years

and the local people would like to see good housing in its place. The danger is that keeping an employment site derelict whilst attempts are made to market it can lead to the village being affected permanently, particularly in relation to its schools and local services such as shops.

#### **Policy 62– Design and Local Distinctiveness**

Solar powered lighting perhaps should be the norm.

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

What is the **efficient use of the land**? If it means just putting as many homes on each site as is possible, Clyst Honiton PC does not support it. This is an important matter for the proposed new town, where the housing density should involve the whole site not just one plot of land at a time.

Housing Density (both net and gross) is a simple measure which often paints a misleading picture, but if maximising it goes against providing proper open spaces and good sized gardens etc, then it is not really 'efficient'.

The cautionary tale here is to have a flexible approach with guidance to planners and to treat each site on its merits rather than set down policies.

#### **Strategic Policy 65– Walking, cycling, and public transport**

Public Transport – it is often the case that developments are justified as sustainable because they have access to public transport. As has been seen in recent weeks however the provision of this is subject to changing circumstances with some areas having vastly reduced bus services being withdrawn and reduced by Stagecoach. A development deemed as sustainable on this basis might not be before the work starts. References to such facilities should always be treated with scepticism and the assumption that all of the new residents will use their cars is the only safe model when assessing contributions.

#### **Policy 67– Travel Plans, Transport Statements, Transport Assessments**

These are a waste of time unless their accuracy is checked. Past experience says that, when they are checked against what actually happens there are many differences, with actual usage being worse than were predicted.

**Policy 68– Parking standards**

This policy does seem to be refined enough. Is there any up to date evidence that 1.6 is sufficient, particularly with road widths being narrower and garages being unusable for most modern cars. If insufficient car parking spaces are provided, the result is that cars are parked on pavements or too close to each other which both have health and safety issues. This is particularly the case in narrow cul-de-sacs where it is sometimes impossible to get emergency vehicles between parked cars.

**Policy 71- Aerodrome Safeguarded Areas and Public Safety Zones**

This is a negative policy. Is that allowed?

**Strategic policy 72– Digital Connectivity**

This needs to be made available to access all suppliers, not just one.

**Policy 83- Development on High Quality Agricultural Land**

The problem here is that the development of the new town will require this to happen. If land is allocated within the Local Plan, surely this element will already have been considered?

**Policy 85 – Protection of irreplaceable habitats and important features**

Is veteranisation a word? If so, what does it mean?

**Policy 87– Biodiversity Net Gain**

Create bio-diverse corridors rather than isolated patches.

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



What about allotments?

For the new town it is suggested that the creation of a Suitable Alternative Green Space (SANGS) would be required. As mentioned above, the aspirations should be to create a more 'Green' environment which would be more in keeping with where it is going to be rather than an urban sprawl.