



Representations to the East Devon Local Plan 2020 to 2040 (Regulation 19 Publication Draft)

Land to the South of Littleham, Exmouth



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Planning Potential Ltd
Bristol



Client : Bloor Homes Exeter Limited
Report Reference:
22/6821

1. INTRODUCTION

- 1.1. These representations have been prepared on behalf of Bloor Homes Exeter Limited (herein known as Bloor Homes), who have an interest in Land to the South of Littleham, Exmouth.
- 1.2. The Land to the South of Littleham, Exmouth is allocated for a mixed-used development, which seeks to develop around 410 new homes, 1.6 hectares of employment, and supporting community uses under Strategic Policy SD01: Exmouth and its development allocations in the East Devon Local Plan 2020 to 2040 (Regulation 19 Publication Draft).
- 1.3. Bloor Homes are wholly supportive of this allocation and have, for the past six months, been working in partnership with Clinton Devon Estate, who is the owner of the site, to promote this site for residential development. Bloor Homes are in the process of preparing a robust evidence base and completing survey work with a view to submitting a hybrid planning application in Autumn 2025. The site is the subject of signed Planning Performance Agreement with East Devon District Council and has been subject to public consultation.
- 1.4. Bloor Homes are well versed in promoting and developing strategically important sites such as the Land to the South of Littleham. They are the largest family owned and run housebuilder in the country and are active in Devon with schemes being developed at Pinhoe, Exeter, and Dawlish.
- 1.5. These representations have been submitted in response to the East Devon Local Plan 2020 to 2040 (Regulation 19 Publication Draft). Bloor Homes have only recently become involved in the site. As such, these representations build upon the submission made by Clinton Devon Estates to the Regulation 18 Consultation Draft. Accordingly, the representations are submitted on behalf of Bloor Homes and Clinton Devon Estates in respect of this site, although, for ease of reference, only Bloor Homes is referred to when discussing the representations. It is understood that Clinton Devon Estates will be submitting separate representations in respect of their other interests whilst Bloor Homes will also be submitting additional representations regarding their other sites in East Devon.
- 1.6. The preparation of the Local Plan commenced in 2021 and has moved through the initial stages of evidence gathering and options assessment. It is now at the Publication Draft Stage following the Draft Local Plan Consultation (Regulation 18) stage that occurred between November 2022 and January 2023 (and latterly the Further Draft Local Plan Consultation between May and June 2024).
- 1.7. The Land to the South of Littleham, Exmouth was allocated in the Regulation 18 Consultation Draft for a mixed used development of 410 homes and 1.6 hectares of employment land. These representations will therefore demonstrate how the site is an appropriate, deliverable and suitable proposition for residential development and that the Local Planning Authority has been correct in its approach to allocate this site as a means of providing new homes to support the growth of the principal centre in East Devon.
- 1.8. The residential development of the site fully aligns with the vision and strategic objectives of the Local Plan. These representations will illustrate how it can help meet the Council's overall housing requirement whilst enabling sustainable growth at Exmouth. It will introduce new facilities and provide support for the existing services in Littleham. The site can be delivered in the short term thereby helping to meet five-year housing land supply requirements. It is not reliant on significant infrastructure whilst it is considered site-specific matters relating to landscape impact, open space provision and relationship with existing infrastructure can be successfully overcome.
- 1.9. Accordingly, the site has numerous benefits:
 - It is under the control of parties, who can bring forward development at pace.
 - The development of the site will significantly contribute to the overall housing delivery in the early part of the Local Plan period.
 - It has the ability to achieve a comprehensive, high quality residential development.
 - The development of the site will be landscape-led given its sensitive location in the National Landscape (NL).
 - It will provide for much needed new market and affordable housing within the principal centre of Exmouth.
 - It will create new employment opportunities through new job creating development that will enable sustainable growth.
 - The proposed development will incorporate Suitable Alternative Natural Greenspace (SANG) that will serve both existing and new residents of Littleham; and
 - New community facilities will be provided together with support for existing services in Littleham.

1.10. This representation comprises the following sections:

- Section 2 describes the site.
- Section 3 summarises the vision for the site.
- Bloor Homes' representations to Local Plan policies are contained in Section 4; and
- A summary is provided in Section 5.

2. THE SITE

- 2.1. The site is located to the east of Exmouth, adjacent to the village of Littleham. It lies immediately south of the Liverton Park Retail Estates. The northern boundary is formed by the B3178 Salterton Road. To the west of the site is the settlement boundary of Littleham, which consists of a relatively recent small residential development and older properties along Chapel Lane, which are larger in size.
- 2.2. Further to the south is the cemetery and grounds attached to the St Margaret's and St Andrews Church, which is a Grade II* Listed Building. The site's southern boundary is formed by the church and a series of small, detached properties. To the east, there are open fields and countryside. The site forms part of the East Devon NL.
- 2.3. The site is approximately 30 hectares in size. It consists of a series of large, flat arable fields that slope from the north to the south. There are a series of hedgerows that traverse the site together with some mature trees, which can be found more towards the south. There is also the Exmouth to Budleigh Salterton Cycle Track that runs through the lower central part of the site.
- 2.4. The majority of the site is located in Flood Zone 1 apart from an area in the southern part that follows the path of the Littleham Brook, which is Flood Zone 3. The site is located in a SSSI Impact Risk Zone whilst, in addition to the main St Margaret's and St Andrew Church, its Lychgate at the entrance is also listed.
- 2.5. Exmouth is the largest town in East Devon with a population of around 35,700 residents. It grew rapidly in Victorian times as a popular seaside resort and tourism still forms an important part of the town's economy, although there is a substantial flow of out commuters to Exeter.
- 2.6. The town has a wide range of services and facilities with a large secondary school and primary schools, a variety of shops, sports facilities, a library, GPs, hospital, railway station and regular bus services. The town centre, where most facilities are located, is positioned in the south westerly part of Exmouth.

Previous Site Promotion

- 2.7. The Land to the South of Littleham, Exmouth was the subject of representations submitted by Bell Cornwell LLP on behalf of Clinton Devon Estates to the Regulation 18 Consultation Draft. In relation to Policy 20, which considered Exmouth, Clinton Devon Estates strongly supported the Plan's proposal to locate a substantial amount of new development at Exmouth given the town's size and sustainability attributes.
- 2.8. The Estate also strongly supported the proposed allocation of the specific sites within Policy 20. They stated that all of the sites were deliverable and suitable for development. They were also well related to Exmouth's existing built-up area. The representations noted that the Estate had been involved in promoting these sites for development and had made submissions to the Housing and Employment Land Availability Assessment (HELAA).
- 2.9. In terms of Land to the South of Littleham, the representations stated that the land is able to deliver a substantial amount of growth to Exmouth and in a manner which would provide a number of benefits.
- 2.10. In addition to being able to provide a sizeable amount of housing, development of this land would be well sited close to the existing employment areas at Liverton Business Park and at Dinan Way and would therefore be sustainability sited. The allocation of the northern part of the land for employment use would be sensible in that it would relate well to the existing Liverton Business Park and can help to provide balanced growth in the town. The Estate supported the proposed allocation of this land.

Site Delivery

- 2.11. The delivery of the Land to the South of Littleham benefits from Bloor Homes, together with Clinton Devon Estates, controlling all of the land. In these terms, Bloor Homes has experience of delivering strategic residential-led, mixed use sites that will deliver the proposals from start to finish.
- 2.12. The land is free from any major physical constraints that would prevent the site from coming forward early in the Plan period. In this regard, Bloor Homes have entered into negotiations with Officers from East Devon District Council regarding the preparation and submission of a hybrid planning application for the site. The intention is to submit the planning application in Autumn 2025 to coincide with the Examination into the Local Plan.

- 2.13. Accordingly, these representations demonstrate the site's capacity to deliver 410 new homes, 1.6 ha of employment and community benefits in the short term thereby providing much needed new housing for Exmouth.

3. THE SITE'S VISION

- 3.1. The vision for the site is to deliver a sustainable development at an accessible location set within a high-quality natural environment that will meet the residential and employment needs of Exmouth, which is the principal settlement in East Devon, whilst also providing for new community facilities and open space for the residents of Littleham.
- 3.2. The Land to the South of Littleham is one of several sites identified to meet the requirements of Exmouth, where it has been identified that there is a need to accommodate around 2,300 homes during the plan period.
- 3.3. Bloor Homes are acutely aware of the site's location in the NL and see its location within this sensitive landscape as driving the design and layout of the proposed development. At the heart of the proposals, there will be the need to reflect the wider landscape and provide a positive boundary between the built development and natural environment. The site will also ensure that there is an integration with the existing residential areas of Littleham through the provision of new facilities and amenities that will serve existing and new residents.
- 3.4. The site's topography will determine the areas which will be built upon but, equally important, which will be left free of development. Its contours will inform the location of a highly integrated network of habitats including ponds, swales, woodland and meadows. The proposed development will also accommodate key infrastructure at accessible points that utilise existing facilities such as the cycle path and the church. For instance, through the development of a community hub based on the cycle path.
- 3.5. The site will create significant areas of accessible open space to be enjoyed by all whilst also enabling an improvement in the site's biodiversity.
- 3.6. Through walking, cycling and bus routes, the site will link to local employment, community, and retail facilities. It will also create a significant number of new local jobs through the construction phases while safeguarding land for new employment space to benefit from the synergies with Liverton Business Park. The new employment space will be informed by baseline studies that will define demand and apply this to existing supply. A flexible and open approach will be taken to how this part of the site will be developed.
- 3.7. Sustainability will not only steer the layout of the proposed development but it will be central to the design of the buildings. Every opportunity will be taken to develop low carbon, energy efficient properties, which have a minimal effect on the environment. We will follow the latest building regulations utilising local materials and incorporate energy saving technologies where appropriate.
- 3.8. The site will be designed to ensure that cars do not dominate and people have sustainable transportation choices that are convenient and viable. Roads will be demoted in the overall movement hierarchy and active travel corridors set within greenways will form the primary infrastructure. They will seek to encourage cycling, walking and healthy lifestyles. The site provides good opportunities for accessibility to the wider services and facilities in Exmouth.
- 3.9. The proposed development of the site represents an opportunity to develop a place that is grounded in the landscape and is driven by the need to create a sensitive, reflective development that integrates with Littleham, is built with highest sustainable criteria in mind and provides opportunities for all to enjoy its attractive location. As such, Land to the South of Littleham represents a viable development option with a realistic prospect that new homes can be delivered within the first five years of the Local Plan, as seen by the progress Bloor Homes is currently making towards the preparation of the hybrid planning application.
- 3.10. The proposed development would therefore comprise the following:
 - Approximately 410 high quality new homes with a range of house types, mix and tenures (including affordable provision).
 - New employment space of approximately 1.6 ha of land for a range of job creating uses.
 - The new development will be nestled within the existing landscape. Much of the site will be formed by green infrastructure along its eastern boundary and will see the creation of significant areas of SANGs.
 - New community facilities will be created that will link with existing site elements such as the creation of a new community hub that would include new commercial and community space together with a local orchard and children play space all focussed around the interchange with the Exmouth to Budleigh Salterton Cycle path.
 - New natural drainage attenuation features will be created and link with Littleham Brook to increase biodiversity; and

- A network of active travel routes and leisure trails will permeates the entire development - forming the principal movement structure - and connecting to the site to Littleham.
- 3.11. The Vision for the site will be to create a sustainable, low carbon sensitive enlargement of the principal centre in East Devon which builds on the attributes of Littleham and seeks to support and enhance it through a reflective and appropriate new residential-led, mixed use development that also helps the wider growth and development of Exmouth.

4. REPRESENTATIONS

- 4.1. Bloor Homes support the overall vision and strategic objectives of the Local Plan as set out in the Regulation 19 Publication Draft.
- 4.2. They, however, have concerns regarding the Council's approach to the spatial strategy and the weight to be afforded to sites at Exmouth in comparison to those coming forward in West End. This is particularly the case given that the sites at Exmouth such as Land to the South of Littleham will assist the Local Plan in meeting the proposed housing trajectory in the years immediately following adoption. In a similar vein, Bloor Homes wishes to make comment on overall housing and employment land provision, as well as the specific allocation relating the Land to the South of Littleham. Representations will also be made on topic specific matters relating to affordable housing provision, ecology, transport, landscape and heritage.
- 4.3. In making these representations, Planning Potential, on behalf of Bloor Homes, has taken account of the tests of soundness which will be applied to the local plan when it is examined by the Local Plan inspector. NPPF Paragraph 36 confirms that plans would be considered sound if they are:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by Statement of Common Ground; and
 - Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 4.4. Regarding this, Bloor Homes are strongly of the view that the Land to the South of Littleham presents a unique opportunity to help the Local Plan to deliver a strategically important mixed-use development at the principal centre of Exmouth during the early years of the Plan Period thereby providing for a more robust delivery of housing in East Devon.
- 4.5. This section therefore sets out Bloor Homes' views and comments on policies in the Regulation 19 Publication Draft of the Local Plan and how they should be revised in order to make the Local Plan sound and ensure that it aligns with government objectives. This will mean that the Local Plan can be adopted in line with the current timescale and enable the planning system in the area to be genuinely plan-led.

Policy SP01 – Spatial Strategy

- 4.6. The aim of the spatial strategy is to direct new development towards the most sustainable locations in East Devon. The spatial strategy seeks to focus new development at locations that are, or can be made, sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Bloor Homes is supportive of this approach.
- 4.7. However, it is their view that development sites in Exmouth should be given the same weight as those in the West End and that they should be positioned equally within the settlement hierarchy. Strategic Policy SPO1 outlines the distribution of development across East Devon based on a clear settlement hierarchy. In this hierarchy, development at the West End is given significant emphasis, which is not disputed, however, Exmouth, despite being the principal centre in East Devon with substantial potential for growth is not afforded the same level of importance.
- 4.8. Bloor Homes agrees with the hierarchical approach in principle. It is, however, vitally important that the hierarchy correctly reflects the existing characteristics of settlements within East Devon and assigns appropriate levels of growth to each.
- 4.9. In this regard, the NPPF does not prescribe a strict settlement hierarchy but emphasises the importance of sustainable development and the role of different settlements in meeting housing and economic needs. It encourages local planning authorities to develop their own hierarchy based on the characteristics of their area, taking into account factors such as accessibility, the capacity of infrastructure, and the need to support sustainable patterns of movement.

- 4.10. In the Local Plan Evidence Base, it is recognised that Exmouth has the largest population and is the most economically active town in East Devon. As such, development at this location will have significant sustainability benefits given the current role it plays in the settlement hierarchy in terms of serving a wide catchment area whilst benefiting from good public transport connections to the rest of East Devon and beyond.
- 4.11. Moreover, Exmouth benefits from existing infrastructure, amenities, and a wide range of services and facilities - all of which make it a critical location for further development. The West End's prioritisation over Exmouth seems slightly disproportionate when considering the potential for sustainable development in Exmouth. Both areas should be treated equally in the Local Plan to ensure balanced growth across the district. At present, Exmouth's potential contribution to the district's overall development strategy is undermined. A more balanced settlement hierarchy would promote equitable development, ensuring that Exmouth receives appropriate attention and investment alongside the West End, whilst creating a more balanced distribution of resources and amenities.
- 4.12. However, this view has not been translated into Strategic Policy SP1. The Local Plan currently places undue emphasis on development in the West End, focusing significant housing and employment growth in this location. While the West End is an important economic area, Exmouth is the largest town in East Devon, with substantial infrastructure, transport links, and amenities to accommodate sustainable growth.
- 4.13. The exclusion of Exmouth from the same strategic tier as the West End is unjustified given its size, economic role, and capacity to support development.
- 4.14. If the underlying objective of the emerging Local Plan is to direct development towards the most sustainable locations, we consider that it is essential for the spatial strategy to be amended to reflect the settlement hierarchy and acknowledge that Exmouth, a tier 1 settlement, should also be a 'focus' for new development akin to the new settlement and the western side of the district.

Recommendation

- 4.15. Bloor Homes raise concerns with the overall direction of the Spatial Strategy as set out in Strategic Policy SP01. The Council should reconsider the drafting of this policy to ensure that development opportunities in Exmouth are given the same weight as those in the West End. Adjusting the settlement hierarchy to reflect this would promote balanced growth, harness the full potential of Exmouth, and ensure equitable development across East Devon.
- 4.16. The Local Plan should distribute development more equitably across the district thereby ensuring Exmouth receives equal strategic weighting, which would allow for a fairer distribution of employment opportunities and housing, preventing over-reliance on one area. Accordingly, Exmouth should be at the top of the settlement hierarchy as set out in Strategic Policy SP01. This amendment would ensure that the settlement hierarchy focusses growth in the major development area of West End as well as the principal centre of Exmouth, this will result in a more balanced and justified approach to spatial development across East Devon.
- 4.17. Bloor Homes objects to the current wording of this policy.

Strategic Policy SP03 – Housing Requirement by Designated Neighbourhood Area

- 4.18. This policy sets out the housing requirement figure for each designated neighbourhood area. It outlines the requirement for the period from April 2020 to April 2042. For Exmouth, this amounts to 2,311 homes, which will come from completions and allocations. A review of the Designated Neighbourhood Area Housing Requirements Figures (HOU-014) indicates that the Land to the South of Littleham forms part of the overall housing requirement figure for designated Exmouth Neighbourhood Area.
- 4.19. On this point, the site at Littleham will be the subject of a hybrid planning application, which is due to be submitted in Autumn 2025. The anticipation is that it would be determined during the course of 2026 and that, if approved, work on the site could commence in early 2027 with the first homes being completed later in that year. This is significantly in advance of the schedule set out in the appendix to the Designated Neighbourhood Area Housing Requirements Figures (HOU-014), which suggested that site will not start delivering homes until 2032/33.
- 4.20. In addition, the policy notes that these figures represent the minimum housing development in each of the Designated Neighbourhood Areas over the plan period. Proposals for additional housing, including through allocations in neighbourhood plans to meet a specific local need will be supported where they are in accordance with other strategic policies in this Plan and supported by appropriate evidence.

4.21. This policy aligns with the guidance in the NPPF at Paragraph 69, which states that:

'Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.'

4.22. In principle, Bloor Homes are supportive of this policy, the fact that Land to the South of Littleham forms part of the overall housing requirement for Exmouth and the drafting of the policy that says the figures should be considered as a minimum.

4.23. However, the Council should be mindful - that at the point of submission for examination - the housing requirement specified in Strategic Policy S03 is up to date and based on the latest available inputs to the Standard Method. Failure to do so would undermine the plan's ability to be 'positively prepared' and 'consistent with national policy' - two key tests of 'soundness.'

4.24. Moreover, it is important that the final housing figure continues to be expressed as a 'minimum' figure. As recognised by government and the Council, there is a serious shortage of new homes being delivered where there are pressing affordability issues. This is further compounded by a shortage of new homes coming forward. Accordingly, Bloor Homes supports Strategic Policy S03 in determining that the housing requirement should not be a cap for development and the figure represents the minimum number of new homes that should be planned for in the authority area.

4.25. Indeed, in these terms, it is noted that the Local Plan does not account for unmet need from neighbouring authorities. This position might change given the uplift in housing targets in neighbouring authorities as well as the wider uncertainty regarding proposed local government changes in Devon. As such, Bloor Homes suggest that this matter should be kept under review.

4.26. Furthermore, it is recommended that Statements of Common Ground on this matter should be agreed prior to the plan being submitted for Local Plan Examination. The Council will be aware that it is under a Duty to Cooperate and will need to demonstrate effective and on-going joint working with neighbouring authorities. This is particularly relevant given the recent experience of BCP Council, whose Local Plan Examination has not progressed following a failure, perceived by the Planning Inspectorate, to cooperate with Dorset and New Forest Council in relation to housing matters.

Recommendation

4.27. Strategic Policy S03 is supported by Bloor Homes. The inclusion of Land to the South of Littleham as part of the overall housing requirement for Exmouth is welcomed. Likewise, the fact that the policy suggests that the figures set out should be considered to be a minimum is also considered to respect 'best practice' and will allow for much needed flexibility in terms of housing provision. That said, the Council, in the lead into the Examination, should ensure that the housing requirement figure is up-to-date and that they have adequately addressed the Duty to Cooperate in terms of unmet housing need from neighbouring authorities.

4.28. Bloor Homes support this policy.

Strategic Policy SP04 – Employment provision and distribution strategy

4.29. Bloor Homes note that the Council have sought to prepare a robust technical evidence base to determine the quantum of new employment land required within East Devon during the Local Plan period. This is welcomed.

4.30. However, and despite acknowledgment in the preceding paragraphs that employment uses now encompass a wider range of use classes beyond traditional office, industrial, and retail functions, the current drafting of the policy does not appear to reflect this. Equally, the supporting text notes that there will be an increasing role for emerging technology, homeworking, and artificial intelligence (AI) in shaping employment patterns in future but, again, the allocation of employment sites does not seem to take this into account.

4.31. Accordingly, Bloor Homes object to the policy in its current form on the grounds that employment-generating uses outside of Class E are not given the same weight as those within this category. It is noted that underneath the categorisation of the employment uses, there is a provision which states that:

'Other employment generating development, such as sustainable green rural tourism and leisure development will be permitted in accordance with other Plan Policies.'

- 4.32. This is welcomed because the economy (type of jobs) is evolving rapidly, and many viable employment uses do not neatly fit within traditional employment uses such as manufacturing, logistics, and offices. Other sectors can and will contribute significantly to employment and economic growth. The current lack of weight or prominence given to these non-traditional employment uses risks creating an imbalance in how employment sites are allocated and developed, which could undermine the ability to provide a diverse and adaptable employment landscape in East Devon.
- 4.33. Furthermore, if technical evidence demonstrates that there is demand for a non-traditional employment use and that supply of employment land for offices, industrial and logistics is sufficient then alternative employment uses should be permitted on sites. This approach will allow for a responsive and evidence-based allocation/development of employment land, ensuring that East Devon can attract and retain a diverse range of businesses.
- 4.34. Accordingly, the policy should also provide greater flexibility in the quantum of land required for employment uses, as it might be the case that emerging industries require less space (than that allocated in the Local Plan) to meet the same level of employment creation. It also considered that the policy should include mechanisms to reassess employment land allocations in response to evolving market conditions and business needs.
- 4.35. In summary, while Bloor Homes support the Local Plan's acknowledgment of the changing nature of employment uses, we urge the Council to:
- Give equal weight to non-E-class employment uses in the policy.
 - Include a policy caveat allowing flexibility where technical evidence shows a need for alternative employment uses or different size requirement; and
 - Ensure the policy framework remains adaptable to economic changes, including technological advancements and evolving work patterns.

Recommendation

- 4.36. Bloor Homes do not object to the overall direction of the policy but consider that there is a need for more recognition that employment and job creation come from a variety of different sources and uses. This means that traditional allocation of land as part of mixed-use development will require some flexibility to be applied if it is brought forward. This flexibility should be in form of the weight to be given to non-traditional forms of employment in the policy, the quantum of land required and the introduction of a review mechanism to ensure the employment land provided is 'fit for purpose' and is developed positively.
- 4.37. Bloor Homes objects to current wording of this policy.

Strategic Policy SD01 – Exmouth and its Development Allocations

- 4.38. Strategic Policy SD01 identifies the sites allocated for development in Exmouth.
- 4.39. The Council's settlement hierarchy confirms Exmouth's sustainability credentials by being the only Tier 1 settlement in East Devon. Given our comments in respect of Strategic Policy SP01, it is Bloor Homes' view that Exmouth should be held in the same regard in terms of growth as the proposed new town and Cranbrook and comprise a 'focus' for new development. Notwithstanding this, Bloor Homes supports this policy in that it is actively bringing forward the Land to the South of Littleham, which is identified within this policy as an allocated site for development.
- 4.40. The benefits of the site are set out in Section 3 – The Vision. The proposed development at Land to the South of Littleham will provide for high-quality new homes in a mix of sizes and tenures that will provide for an attractive place for people to live, work and play.
- 4.41. Bloor Homes are in the process of preparing a hybrid application for the site at Littleham. This is in advance of the Local Plan, and its adoption, but indicates how the site is a viable, deliverable and appropriate location for residential development that is free of constraints.
- 4.42. Strategic Policy SDO1 notes that site, which is on the north eastern side of Exmouth is allocated for a mixed-use development to provide:
- Around 410 new homes.

- 1.6 hectares of employment; and
 - Supporting community uses.
- 4.43. Bloor Homes' scheme, which is currently being prepared, is based on this quantum and disposition of uses and will provide for each element. The residential development will be for approximately 410 homes and, in this regard, we note that supporting Paragraph 5.2 states that higher or lower levels may be possible depending on site-specific constraints or opportunities. This flexibility is supported given that that overall capacity of sites will often depend on site-specific matters.
- 4.44. Turning to the employment area, the application for this area will likely be in outline given that technical evidence is in the process of being prepared. Accordingly, the application will secure the use of this part of the site for employment. However, as our comments to Strategic Policy SP4 note, if evidence can be provided to demonstrate a non-traditional employment use or an area less than that allocated is more appropriate then the Local Planning Authority should considered any later, detailed applications in this light.
- 4.45. The policy notes that the allocation at Littleham will need to come forward on the basis of an agreed masterplan for the whole site, which clearly demonstrates how comprehensive development will be undertaken and implemented. Bloor Homes supports this approach and are in the process of preparing a site masterplan that will incorporate the different elements. This includes the supporting community uses, which are currently focussed around a proposed intersection with the cycle path.
- 4.46. The masterplan will be cognisant of the site's sensitive location within the NL. The proposed development will be landscape-led and will benefit from significant areas of open space on site that will be utilised for SANGs, drainage attenuation, biodiversity and amenity open space. The development will therefore sit in a strong landscape framework that will maintain the site's connection within the wider landscape.
- 4.47. The current masterplan reflects the listed church to the south through maintaining its setting by locating SANGs in the south. This aspect will link with the potential additional cemetery provision that is being considered as part of the proposed development. The SANGs is to be provide on-site and is to be located between the new development and the existing settlement of Littleham thereby benefitting both existing and new residents with accessible, open space that will be consistently and appropriately managed for the next thirty years.
- 4.48. The site is highly accessible as it is within walking distance of facilities within Littleham whilst it will supplement these through the development of new community facilities in the form of a possible community space, new commercial facilities and or local workspace. The proposed development will be serve by a new roundabout at Salterton Road that would also accommodate a new arm from Liverton Business Park, thus, creating a shared intersection (which is a requirement of the policy).
- 4.49. Opportunities to prioritise travel by sustainable modes will also be taken through the cycleway and the introduction of new footway provision along Salterton Road and new footpaths and cycleways through the site. The site will create an environment where green space and green corridors create a sense of living in the landscape. A number of key amenity spaces will be created that will be linked by green corridors around the perimeter of the site and permeating through it. The eastern edge of the site will be enhanced to create a natural edge to the site and Littleham.
- 4.50. The proposed development of the site will be sensitive to flooding matters and will introduce Sustainable Drainage Systems (SuDS) through natural attenuation ponds that will help reduce the volume and rate of surface water. It will also meet biodiversity net gain requirements, comply with the Future Homes Standard, and include EV charging points and solar panels.

Recommendation

- 4.51. Bloor Homes support this policy and the allocation of Land to the South of Littleham to accommodate a residential-led mixed use development of approximately 410 homes, employment land and community uses. Bloor Homes are in the process of preparing a detailed application for the residential element that will be submitted with an outline application for the employment land. The application has been driven by an emerging masterplan will seeks to address each of the points noted in the policy, which is:
- Landscape-led, sensitive design to reflect the site's location in the NL.
 - Appropriate and viable employment space.
 - New access arrangements and suitable interchange with the existing cycle path.

- New community hub based on the cycle path.
- Understanding of the setting to the listed Church.
- New SANGS provision together with amenity open space and play facilities.
- Sustainable drainage features that will help enhance biodiversity; and
- Low carbon, fabric first design of the buildings to meet the latest regulatory standards.

Strategic Policy HN02 – Affordable Housing

- 4.52. Strategic Policy HN02 considers affordable housing provision. The supporting text to the policy notes that there is a high level of affordable housing need in the district, with high house prices and rents. The policy specifies affordable housing requirements for different areas and types of development, ensuring affordability in perpetuity and integration with market housing.
- 4.53. It states that to foster balanced and mixed communities, affordable housing will be required on all developments above a certain size. It also notes that the policy includes schemes for specialist housing for older people, which must provide affordable housing, where the site is delivering self-contained units (C3 and C2).
- 4.54. In terms of the Land to the South of Littleham, the policy states that 30% affordable housing is to be provided at all Local Plan allocated sites with the exception of the second new community, sites at Sidmouth and Budleigh Salterton as well as Axminster, and any windfall site across East Devon.
- 4.55. This need is to be met through a mix of social rent (65%) and intermediate or other forms of affordable housing (35%), which it is assumed would be shared ownership and discounted market sales. This approach aligns with national planning policy, which requires local authorities to make sufficient provision for affordable housing in local plans, explaining that plans should set out how developers should contribute to providing such housing, including the amount and types of affordable housing required. These affordable housing contributions should be based on evidenced need and not undermine the deliverability of development. In regard to the last point, it is noted, at Paragraph 8.4, the policy is supported by local evidence from the East Devon Local Housing Needs Assessment (whilst Bloor Homes has also had regard to the Exmouth Housing Needs Assessment that was prepared for Exmouth Town Council in March 2024).
- 4.56. Strategic Policy HN02 also notes that the affordable housing units are to be provided on-site and dispersed in small clusters in a way that is indistinguishable in terms of design and materials from any market housing and be in a mix of property sizes and types across the site, demonstrating how the site responds to robust, up to date evidence about housing need. In addition, the policy states that applicants can submit development viability evidence to justify a departure from the policy position and that residential institutions such as C2 care homes are exempt from the policy.
- 4.57. In order to achieve the level of affordable housing requirement set out in the policy, it is critical that it can be demonstrated that this level of provision is viable when considered alongside all other contributions sought through the Local Plan.
- 4.58. It is essential for the overall soundness of the plan that the proposed affordable housing quantum, which is higher than the % level in the extant Development Plan is subject to robust viability assessment. It should have regard to all other policy requirements for development and ensure that the total policy 'ask' is clearly assessed as part of a robust viability model to inform the plan. It is essential that affordable housing requirement figure is robustly tested prior to Examination in order for the policy to be found sound.
- 4.59. At present, there is limited certainty that this level of affordable housing is deliverable, noting that the infrastructure requirements associated with some of the proposed allocations (which are in some instances very extensive) do not appear to have been costed. Evidently, there is a requirement for further assessment, as it would seem likely that the percentage of affordable housing identified is unlikely to be viable at least in association with those proposed allocations where infrastructure is a requisite need.

Recommendations

- 4.60. Strategic Policy HN02 as drafted is unsound as this will likely undermine the deliverability of the Local Plan, which, in turn, could compromise the ability to deliver the overall housing requirement. This is not consistent with national guidance, as not only could it jeopardise the delivery of homes more generally but it will reduce the number of affordable homes actually delivered. This does not represent positive planning.

4.61. The policy should be modified to seek a level of affordable housing which is viable. This in turn is likely to require the delivery of a greater number of homes than identified above to meet affordable housing needs.

4.62. Bloor Homes objects to this policy.

Policy HN03 – Housing to meet the needs of Older People

4.63. In this policy, the Council will support development that widens choice by securing a more diverse supply of market and affordable housing for older people in East Devon. This will include residential care homes. The policy is in two parts.

4.64. The first suggests that development proposals of this nature will have to meet a range of criteria such as how the design addresses the health and wellbeing of older people, be within 400 metres of local facilities and shops, and be supported by a Care Needs Assessment to justify the development proposal's scale, tenure and accommodation type.

4.65. The second part of the policy states that all general housing proposals, subject to commercial viability, will be required to deliver specialist housing for older people while schemes for 200 or more dwellings should include at least 10% as on-site as specialist older person dwellings as either C3 dwellings and/or C2 equivalents.

4.66. Whilst the principle of providing housing for older people is supported, the policy, as currently drafted, raises a number of concerns. First, in terms of the site requirements, it applies a one-size fits all approach to proposals. It does not account for the specific characteristics and constraints of a site that may prevent it delivering homes appropriate for older and disabled people. Whilst new housing allocations will be within sustainable locations, they will not necessarily meet the specific accessibility requirements.

4.67. Accordingly, it is considered that this part of the policy should be amended to allow for greater flexibility to ensure deliverability is not impacted or, alternatively, the Council should consider specifically allocating specialist accommodation in the right locations, rather than relying on all housing allocations to deliver specialist older person accommodation.

4.68. Secondly, it is not clear whether the policy requires the 10% of specialist older person housing to be in addition or instead of the required level of affordable housing. Given that affordable housing is not mentioned, it is presumed that this is in addition to affordable housing. On this basis, for a site such as Land to the South of Littleham, this would mean a requirement to provide 40% of the housing as specialist or non-market. This, of course, raises concerns regarding site viability, particularly, on larger sites such as the Land to the South of Littleham that will have to provide strategic infrastructure such as SANGs.

4.69. On this basis, the requirement to provide for at least 10% as on-site as specialist older person dwellings is subject to commercial viability is welcomed. However, the policy, in terms of its second part, would, in addition to this, benefit from significant re-drafting to clarify and confirm the Local Planning Authority's approach.

4.70. The requirement to provide 10% specialist housing in addition to 30% affordable housing on schemes such as Land to the South of Littleham is prohibitive and will only result in additional costs to both the Local Planning Authority and the applicant as both parties will have to consider the viability matters. This is because there is a significant extra cost with specialist housing given their additional requirements relating to access, need for communal facilities and additional parking requirements for essential staff.

4.71. Furthermore, the Council's approach does not reflect the requirement of large sites to provide for a mix of house types across a range of houses sizes. It is felt that due to the scale and opportunities to introduce a variety of styles that large residential styles will provide for housing that meets the needs of older people, particularly, when considering the requirement for M4 (2) and M4 (3) housing as part of the Building Regulations. The additional requirement, as set out by this policy, is unnecessary and will leave to additional costs during the planning process.

Recommendations

4.72. Bloor Homes object to this policy.

4.73. 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 and applicants. It is considered that the policy is too specific in its requirements to meet older persons housing whilst the requirement to provide such housing in addition to affordable housing purposes raises significant viability issues than will only increase costs to the Local Planning Authority and applicants as they are sought to be addressed through the application process.

4.74. Further clarification is required within the drafting of the policy or, alternatively, the Council should consider specifically allocating specialist accommodation in the right locations, rather than relying on all housing allocations to deliver specialist older person accommodation.

Policy HN05: Self-build and custom build housing

4.75. Bloor Homes objects to this policy and its requirements to provide for:

- At least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self-build plots.
- Be subject to a prescribed and restrictive approach to marketing and pricing.
- Have road access at an early stage; and
- Be of a size to meet local demand

4.76. Furthermore, for sites over 250 dwellings such as Land to the South of Littleham, a proportion of self/custom build plots must be made available for affordable housing whilst there also needs to be a design code, which should be used to provide 'plot passports' that create a simple, succinct summary of each plot as a reference point for the purchaser.

4.77. The need for a variety (mix) of new housing is supported, but Policy HN05 should take a flexible rather than prescriptive approach. Some of the requirements for the self-build element in terms of quantum, availability, infrastructure provision, and house types will have significant viability considerations for housebuilders. Notwithstanding this, there is no evidence presented to support the levels suggested or the thresholds set for self and custom build housing to come forward.

4.78. On a practical level, the inclusion of self/custom build raises potential conflicts in terms of the organisation and management of large residential sites. This because there is a need to provide access (through sites) to the self/custom build plots, to ensure all different self/custom builders are meeting all of the site guidelines and to make certain there is health and safety compliance. The requirement to manage a (potentially) high number of builders together with the main developer will often cause problems. This is exasperated if the level of custom/self-build is raised to the quantum suggested in this policy as well as if it includes both market and affordable housing.

4.79. Moreover, there is no legislative or national policy basis for imposing an obligation on landowners or developers of sites to set aside plots for self/custom build housing.

4.80. Under the Self Build and Custom Housebuilding Act 2015 and 2021, and as referenced in NPPF Paragraph 63, it is the responsibility of the Council, not landowners or developers, to ensure that sufficient permissions are given to meet demand. The Council are not empowered to restrict the use of land to deliver self/custom build housing. Further, PPG sets out ways in which the Council should consider supporting self/custom build by 'engaging' with developers and landowners and 'encouraging' them to consider self/custom build where there is interest.

Recommendation

4.81. Bloor Homes object to this policy.

4.82. There is a requirement to include more flexibility within the policy. The Council should seek to adopt an approach that accords more with national guidance that seeks the local authority to take the lead and work with developers to encourage more self-build plots.

4.83. In addition, further consideration should be given to the viability of sites and the competing requirements relating to affordable housing, housing for older people, and self-build (amongst others). There is a need to deliver much needed new housing and the Council should adopt a pragmatic, flexible to secure a mix of housing on each site.

4.84. Given this, it is suggested that custom/self-build plots should be the subject of a 12-month marketing period provision. If the plots are not taken forward then the policy should allow them to revert to open market housing.

Strategic Policy SE04 – Resisting the loss of employment sites

- 4.85. Strategic Policy SE04 considers the loss of employment sites to other uses. This includes sites which are allocated for employment development. The policy states that such changes of uses will not be permitted.
- 4.86. The policy, however, notes that those sites in B2 and B8 uses will only be permitted for other types of employment use, if it can be demonstrated that, *inter alia*, the alternative use is in accordance with, or does not undermine, the plan's overall spatial strategy, the site is no longer viable for the current type of employment use but is viable for an alternative type of employment use (evidenced by a compliant viability statement), and there is a lack of demand for the current type of employment use at the site (evidenced by a compliant marketing statement).
- 4.87. Compliant viability, marketing and supply statements must adhere to the respective requirements set out in the relevant guidance published and be available online via the Council's website. If an alternative use is acceptable, then applicants will be required to demonstrate that they have endeavoured to incorporate an appropriate (in terms of scale and type) element of employment floor space as part of the new development.
- 4.88. The supporting text allows for exceptions where alternative employment uses or mixed-use regeneration can be justified, provided they support the sustainability and viability of employment areas (Paragraph 9.20) whilst Paragraph 9.22 states as the economy evolves, not all employment areas will remain viable for their current uses. The policy allows for alternative uses if there is no realistic prospect of continued employment use, but this must be supported by robust evidence of viability and market demand. If an alternative use is appropriate, incorporating an element of employment provision should be considered.
- 4.89. The direction of this policy is supported by Bloor Homes. It notes that there will be a presumption against alternative uses of employment sites unless there is sufficient evidence to demonstrate that these uses will provide for suitable job creation, that there is a demand for this use, and that conversely there is no demand for more-traditional employment uses.
- 4.90. In this regard, we would refer to our representation to Strategic Policy SO4. This states that if technical evidence demonstrates there is demand for a non-traditional employment use and that the supply of employment land for offices, industrial and logistics is sufficient then alternative employment uses should be permitted on sites. This approach will allow for a responsive and evidence-based allocation/development of employment land ensuring that East Devon can attract and retain a diverse range of businesses.
- 4.91. Provision within the policy should also provide greater flexibility in the quantum of land required for employment uses, as it might be the case that emerging industries require less space (than that allocated in the Local Plan) to meet the same level of employment creation.
- 4.92. It is considered that the current draft of Policy SE04 reflects this, however, we would note that criteria for when exceptions to the presumption against can be applied are drafted only in relation to existing employment sites, whilst the first paragraph states that the policy relates to those sites that are allocated. The provisions in the policy therefore needs to address existing employment sites and proposed employment allocations

Recommendation

- 4.93. Bloor Homes does not object to proposed strategic policy.
- 4.94. That said, they consider that its wording should be re-considered so that it more clearly addresses proposed employment allocations, particularly, when the exceptions apply to the presumption against alternative uses on employment sites/allocations.

Policy SE05: Employment and Skills Statements

- 4.95. This policy requires all major development over 100 homes to submit a basic Employment and Skills plan. The purpose of this plan is to commit the applicant to maximise the provision of skills and employment opportunities, to benefit the local population as well as the employer. These documents should be submitted with planning applications and will be implemented through a planning obligation or condition.
- 4.96. The supporting text notes that these statements should outline commitments to local employment and seeks to support economic growth by raising skill levels in the district.

- 4.97. Bloor Homes supports the Council's approach in seeking to ensure that the economic and employment benefits of major developments are focussed on the local area. However, they would note that such Statements are likely to replicate much of the information that is required to be submitted with major developments such as Socio-Economic Chapters within Environmental Statements.
- 4.98. This is not to say that Bloor Homes does not wish to support the local economy and, as a company, they seek to employ as many local firms as possible given that they are usually the most convenient and have the most appropriate skill sets for work on their sites. However, it is felt that there are better mechanisms to achieving this goal than the provision of an additional statement or report. Rather, Bloor Homes would wish to work closely with the Council's Economic Development Team during the pre-application stage to agree and confirm the approach to be adopted. This process can then agree how the approach to focus employment and spending in the local area can come forward.
- 4.99. This is the approach that is currently being adopted at Land to the South of Littleham, Exmouth and it is considered one that will not be aided by the preparation of an additional, unnecessary statement.

Recommendation

- 4.100. Bloor Homes object to this policy.
- 4.101. It is not considered that an Employment and Skills Statement is needed and it will add extra expense and time to the planning application process. These matters can be adequately addressed in other supporting information and through negotiation and agreement with Officers during the pre-application stage.

Strategic Policy DS01– Design and Local Distinctiveness

- 4.102. This policy set out the processes that developers are required to undertake to help achieve high quality, locally distinctive design. It states that proposals should clearly respond to local policy and guidance including Neighbourhood Plans, Design Guides, Briefs, and Codes such as the East Devon AONB Planning Guidance. Proposals should also be in accordance with the principles of the National Design Code and Building for a Healthy Life, and any other local design guidance.
- 4.103. The layout and design of buildings should make a positive contribution to the street scene/public realm and be well integrated with its surroundings and setting. The policy then sets out a series of criteria for which proposals should adhere to such as the need to respect the key characteristics and special qualities of the area in which the development is proposed
- 4.104. Bloor Homes supports this policy; however, it is felt that some of the policy requirements are onerous and will only delay the planning application process. For instance, the need to address the use of inert materials on site is unnecessary, as all new development will seek to re-utilise such materials on site as it is the most cost-effective and appropriate manner of dealing with such material. Moreover, Bloor Homes notes that national guidance covers many of the matters discussed in Policy DS01 whilst such issues can also be easily addressed within supplementary planning documents, via pre-application discussions or during the wider application process. It is not considered that the high-quality design is less likely to be achieved without such a detailed, specific policy on its requirements.

Recommendations

- 4.105. Accordingly, Bloor Homes supports this policy but suggests that it requires amendments. This policy should be reviewed and assessed against national policy and guidance to see whether some of its detail is better placed within supplementary planning documentation or addressed via other mechanisms.

Policy DS02 – Housing Density and Efficient Use of Land

- 4.106. Density of new development is addressed in Policy DS02. It seeks to optimise the density of the site in a manner that conserves or enhances the character of the area and makes efficient use of land. Proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the council as planning authority.
- 4.107. The supporting text notes that this policy reflects the guidance in the NPPF.
- 4.108. The policy requires all major development proposals and developments in environmentally or heritage sensitive locations to be supported by a Design Code. This element of the policy should be reconsidered.

4.109. As currently worded, the policy does not define what is considered to be a major development and what quantum and form of development would trigger the requirement for a design code, or likewise, what location would be considered to be sensitive. Significant time and resources are required in preparing and agreeing design codes, adding a financial burden and potential delays to development. It is an unreasonable policy burden, particularly, when major development such as Land to the South of Littleham are subject to a requirement to prepare an agreed masterplan.

Recommendation

4.110. There should be no requirement to prepare a masterplan and a Design Code, and this should be made clear in the drafting of the policy. Bloor Homes support the direction of the policy and the need to optimise densities but consider that the requirement for a design code should be removed, or, at least, clarified.

4.111. Bloor Homes objects to this policy in its current form.

Policy TR04: Parking Standards

4.112. The average provision of 1.7 vehicle parking spaces per dwelling is consistent with the standards for other Districts within Devon. These standards may then be adjusted per dwelling depending on the number of bedrooms proposed but the total number should be consistent with that. Any reduction in terms of standards may need to see the provision of public transport within the site and the provision of frequent services reaching Exmouth Station and Exeter. This may need significant infrastructure improvements for buses to be able to access the site, stop and turn around, and bus operators may be reluctant.

4.113. These parking spaces would need to have a minimum number of EV Charging Spaces which is equal to the number of homes provided. A number of accessible spaces would also need to be provided.

4.114. The Regulation 19 Publication Draft states that employment parking standards should be complied with the standards stated. Any potential reduction in the number of spaces would depend on the land uses provided, while offices (for example) may be argued that nowadays generate less vehicle trips due to the opportunity for people to work from home, at least partially, other uses like retail may need to provide the total amount of spaces in compliance with these standards.

Recommendation

4.115. Bloor Homes support this policy save for the suggested amendments to the different forms of employment.

Strategic Policy OLO1: Landscape Features

4.116. This policy states that East Devon's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where the applicant is able to demonstrate through a proportionate Landscape Appraisal that it will protect and enhance valued landscape attributes and special features and qualities that contribute to the character of East Devon's landscapes, in particular where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located, including:

- Land form and patterns of settlement.
- Important natural and manmade features which contribute [positively] to the local landscape character, including topography, traditional field boundaries, trees and woodlands, areas of importance for nature conservation and rural buildings.
- The adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions; and
- Aesthetic and perceptual factors such as tranquillity, wildness and dark skies.

4.117. All development in the countryside should have regard to the most up to date Landscape Characterisation Assessments as a basis for understanding, maintaining and enhancing local distinctiveness and landscape character as well as an up-to-date strategy and guidance for trees and woodlands. This policy applies across the whole plan area including the Cranbrook Plan area.

4.118. "Protected" is not consistent with the NPPF 187 (b) which uses the term "recognised". "Distinctive" should be qualified with "positive" and again contributing "positively" to the local landscape character. Point C is worded poorly and is already covered in Policy OLO4 as visual amenity.

Recommendation

4.119. Bloor Homes support this policy save for the need to make the suggested amendments as set out above in Paragraph 4.124.

Strategic Policy OLO4: Areas of Strategic Visual Importance

4.120. This policy states:

“Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the district, in particular by conserving and enhancing key views and views of local landmarks, including those identified in Neighbourhood Plans.

The following view types are considered to be particularly important:

A. Landmark views to and from viewpoints and tourism and recreational destinations, including the coast, woodland and open countryside.

B. Views from publicly accessible areas which are within, to or from settlements which contribute [positively] to the viewers’ enjoyment of the local area.

C. Views from public rights of way and other publicly accessible areas.

D. Night-time views of dark skies, particularly where lighting is to be introduced in areas of low existing light pollution; and

E. Views which include or otherwise relate to specific features relevant to East Devon and its special qualities, such as key landmarks, heritage assets (either in view or the view from) and biodiversity features.

Development proposals should conserve and enhance sequential views and not result in adverse cumulative impacts within views.

This policy applies across the whole plan area including the Cranbrook Plan area.”

4.121. It is not clear if this policy relates to actual, identified “Areas.” If not, the policy should remove reference to the word “Areas.”

Recommendation

4.122. Bloor Homes support this policy save for the need to make the suggested amendments as set out above in Paragraph 4.127.

Policy PB05: Biodiversity Net Gain

4.123. The policy specifies a 20% BNG requirement but does provide some flexibility for a lower percentage to be applied to major development where there is ‘a demonstrable viability problem to achieve this target’. This essentially passes the Council’s responsibility to the developer.

4.124. However, the Government requires Councils (not developers), who are proposing more than 10% in their Local Plans to provide a local need/opportunity assessment, along with a viability assessment, to justify a higher value. Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development, unless justified. To justify such policies, there will be a need to provide evidence that demonstrates a local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.

4.125. It is Bloor Homes’ view that mandating biodiversity net gain above the 10% threshold may impose undue financial burdens on developers, potentially hindering the delivery of much-needed housing and infrastructure projects. It is essential to strike a balance between environmental objectives and the socio-economic requirements for development.

4.126. In these terms, there is a need for flexibility to reflect the local context, and that the policy should be re-drafted to ensure that it can be applied successfully to each development. Moreover, this flexibility is necessary as biodiversity net gain is an evolving field, and the understanding of effective mitigation measures continues to advance. Whilst guided by national policy, local policy should be worded to allow for flexibility in response to emerging scientific evidence and best practices.

(<https://www.gov.uk/guidance/biodiversity-net-gain-what-local-planning-authorities-should-do>)

Recommendation

4.127. Bloor Homes object to this policy

4.128. There is a need for the policy to be re-drafted so that it more closely reflects national guidance and only provides for a 10% requirement in the uplift of BNG on sites. The current approach does not appear to be evidenced, justified or sound. It therefore fails the tests set out in the NPPF. As set out above, there is a requirement for a more nuanced approach that is more focussed on quality and the site attributes whilst meeting the 10% requirement rather than seeking arbitrarily higher levels of BNG that will impact on the site's viability.

Policy PBO7: Ecological Enhancement and Biodiversity in the Built Environment

4.129. This policy covers ecological features to be delivered as part of the development. Two parts are of potential concern:

- C. An integrated bat loft within all major planning applications, if ecologically relevant (that is, if the site is a suitable location for a bat loft to be constructed - not too isolated or within unsuitable habitat such as heavily urbanised well-lit areas). It would be unclear as to how this could be enforced and monitored post-construction; and
- E. Provision of overhanging eaves suitable for nesting house martins in all major development.

It is Bloor Homes' view that it would be better to strengthen Part B of the policy, which requires a minimum equivalent of 1 bat box per dwelling (to be sited on a building or tree) than have the requirements as set out in Part C of the policy whilst Part E might not be appropriate from a design perspective and should be removed.

Recommendation

4.130. Bloor Homes objects to this policy and suggests that Criterion C can be addressed in Part B of the policy whilst Part E should be removed.

Policy PB09: Monitoring requirements for new planting schemes

4.131. This policy requires placement of a pre-construction financial bond (25% of total planting cost) with the Council, which could be reclaimed at end of five-year period, following approval of planting by the Local Planning Authority. However, there is a lack of detail on how this works in practice in terms of the financial arrangement associated with bond and enforcement. It is also unclear as to whether the Council has the capacity to manage this additional work stream.

Recommendation

4.132. Bloor Homes object to this policy and suggested it should be removed.

Policy OS02: Sport, Recreation and Open Space Provision in association with Development

4.133. This policy considers open space provision in new housing developments. It notes that all major development proposals should include a clear open space strategy explaining how the provision for play responds to local need and provision, provides for all ages and is based on accessibility and an audit of current provision.

4.134. For sites such as Land to the South of Littleham, developers will be expected to provide an audit of existing open space provision within 1.5km of the development and the site's capacity to meet site open space requirements as well as provide on-site Local Areas of Play (LAPs), Local Equipped Areas of Play (LEAPs), amenity green space and all other open space typologies.

4.135. Moreover, all developments of 200 plus dwellings should also seek to ensure that there is, or will be, a Doorstep Accessible Greenspace (defined as any formal/ informal publicly accessible open space) of at least 0.5ha within 200 metres (under 5 mins walk), or a Local Accessible Greenspace of at least 2ha within 300 metres (5 mins walk from home). Additionally, developments of over 300 dwellings should provide, or have access to, a medium sized Neighbourhood Accessible Greenspace of at least 10ha within 1km (15 minutes' walk from home).

4.136. However, the policy notes that the above will be required on site unless, *inter alia*, other substantive open space types are present, or will be provided, and they will provide an alternative better overall open space provision.

- 4.137. Bloor Homes have concerns about this policy. It is seeking significant amounts of open space to be delivered on-site and, whilst alternative provision can be provided, it will be necessary for the applicant to demonstrate that this can be achieved. There is a requirement for more flexibility in the wording of the policy, as there is limited room for variation.
- 4.138. More flexibility should be shown in applying the different scenarios and to allow for site-specific matters to form part of the decision-making process. For instance, the Land to the South of Littleham is to provide a significant amount of SANGs on-site. It is unclear in the policy, as to how this will impact on open space and how this will be taken into account in the policy. There also appears to be little consideration of the viability of providing this level of open space, particularly, when considering all of the other different pressures on site infrastructure (and associated potential financial contributions). It is felt that the requirements – as set out in this policy – could be considered to be an extra burden on the developer.

Recommendation

- 4.139. Bloor Homes supports the direction of this policy and intends to align the development of Land to the South of Littleham in accordance with its requirements but they urge the Council to add more flexibility to the policy and to make allowance for site-specific provision in an alternative form. This will avoid the provision of open space to become an additional burden to home builders as they provide for much needed new housing.
- 4.140. Bloor Homes support this policy but suggest amendments to its drafting to provide for more clarity and flexibility.

Policy HE02: Listed Buildings

- 4.141. In regard to the above policy, the term 'exceptional circumstances' is questioned in relation to less than substantial harm. The only matters where 'exceptional' is cited in national guidance is in relation to substantial harm to Grade II listed buildings, or Grade II registered parks or gardens. Less than substantial harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Recommendation

- 4.142. Bloor Homes objects to this policy and suggests that further qualification of the term 'exceptional circumstances' is provided in the policy and/or supporting text.

5. SUMMARY

- 5.1. These representations have been prepared on behalf of Bloor Homes, who are in the process of submitting a hybrid planning application in respect of Land to the South of Littleham, Exmouth, which is allocated for a residential led, mixed-use development of 410 homes and 1.6 hectares of employment in the East Devon Local Plan 2020 to 2042. The site is the subject of signed Planning Performance Agreement with East Devon District Council and has also been presented to the public.
- 5.2. It is Bloor Homes' view that the site represents a sustainable, deliverable and suitable site for residential development that will help meet the overall housing needs in East Devon and, crucially, will provide housing and new employment space for growth in the principal centre of Exmouth. The site will assist in meeting pressing affordable housing requirements in the town and the wider East Devon area. Moreover, the fact that it is the subject of a planning application now means that it will come forward early in the plan period thereby helping to meet five-year housing land supply provision as well as provide a consistent and sustainable trajectory of sites coming forward.
- 5.3. Given this, Bloor Homes fully support the site's allocation for a residential development of 410 homes with employment space to be provided of 1.6 ha of employment space and new community facilities.
- 5.4. Bloor Homes therefore generally support the Council's approach to the spatial strategy and residential land allocations and consider that it is sound, justified and positively planned. However, Bloor Homes consider that the drafting of some of the policies could be clarified through the provision of further detail whilst some policies will benefit from the inclusion of more flexibility. It is felt that Exmouth should be at the top of settlement hierarchy together with developments in the West End, whilst more flexibility should be applied to employment designations, affordable housing provision and open space requirements.
- 5.5. Bloor Homes' key comments on the Regulation 19 Publication Draft can be summarised as follows:
- Exmouth should be considered similarly to proposed developments in the West End in the settlement hierarchy.
 - The allocation of Land to the South of Littleham in Policy SDO1 is supported.
 - Bloor Homes do not object to the overall direction of strategic employment policy but consider that there is a need to include more recognition that employment and job creation come from a variety of different sources and uses.
 - The viability of the current approach to the provision of affordable housing is questioned and should be reviewed.
 - It is considered that the policy on older persons housing is too specific in its requirements and that it also raises viability concerns.
 - Clarification is required on the need to provide for a masterplan or a design code on strategic allocations; and
 - The drafting of policy on ecology, landscape and heritage matters should be reviewed to ensure consistency with national guidance.
- 5.6. In summary, Bloor Homes supports the allocation of Land to the South of Littleham, Exmouth for residential led development. It is considered that the site represents a suitable and sustainable location for development comprising approximately 410 homes. The site is also under the control of one party and is available and deliverable in the short term, as seen by the ongoing work to prepare an application for the site during 2025.