

East Devon Local Plan 2020-2042 – Publication Stage (Regulation 19)

Representations on behalf of Rubix Strategic Ltd.

1. On behalf of Rubix Strategic Ltd (“Rubix”), we wish to comment on **Strategic Policy SD01**, and specifically on proposed allocation - **Land at Marley Drive (Site ref: Exmo_04a)**.
2. Whilst Rubix supports this allocation in principle, it is considered that the proposed quantum of c.50 dwellings is insufficient as the site can accommodate significantly more than this, taking into account the site characteristics and constraints.
3. Rubix has recently submitted an outline planning application seeking approval for residential development comprising of up to 130 dwellings, public open space, landscaping, sustainable urban drainage system and engineering works, with vehicular access off Higher Marley Road (Application ref: 25/0078/MOUT).
4. The Concept Masterplan submitted with the application (Ref No: RS402/120 Rev.H – attached), illustrates how the site can be developed for this higher quantum, whilst retaining significant areas of parkland and incorporating additional tree planting to mitigate for the small loss of existing trees required to accommodate the development. The Plan also allows for pedestrian/cycle links, both to the adjoining proposed allocation (Lymp_14) and the existing development at Goodmores Farm.
5. The Concept Masterplan has had significant regard to various surveys undertaken regarding ecology/biodiversity, landscaping and arboriculture, and has been designed to ensure that the development maintains the overall landscape/parkland character of the site.
6. It is considered that an allocation of c.50 dwellings fails to make efficient use of the site in terms of achievable residential densities, considering in particular its very sustainable location on the edge of the Tier 1 settlement of Exmouth. This is inconsistent with national policy, as contained within the NPPF, and the emerging Plan is therefore unsound in this regard.
7. Paragraph 129 of the NPPF states:

Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a. *the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b. *local market conditions and viability;*
- c. *the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d. *the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e. *the importance of securing well-designed, attractive and healthy places.*

8. Paragraph 130 goes on to state that:

“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.”

9. East Devon DC cannot currently demonstrate a five-year supply of housing land, falling well below this target at just 2.97 years (December 2024). In such circumstances, and considering NPPF paragraph 129, the Council should be seeking to maximise development densities at proposed allocations, taking into account prevailing environmental and other constraints.
10. As advised, Rubix considers that the development proposed under the current outline application ref: 25/0078/OUT provides a suitable density of development across the entire site, whilst ensuring environmental constraints have been taken into account and appropriate design and/or mitigation measures incorporated within the scheme.
11. Therefore, in order for Policy SD01 to be considered sound, proposed allocation Exmo_04a should be modified to increase the quantum of development to “**around 130 new homes**”.