

Your Ref
Our Ref DS/PCL/
Date 13th January 2023



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Dear Sir/Madam,

**EAST DEVON DRAFT LOCAL PLAN 2020-2040
DRAFT LOCAL PLAN CONSULTATION
REPRESENTATIONS ON BEHALF OF MESSTS SHEARS AND CORK**

Introduction

Thank you for the opportunity to comment on the emerging review of the current Development Plan (DP) – in particular the Regulation 18 Consultation Draft Plan (dated November 2022).

These representations are prepared on behalf of landowners who have a majority interest in the land to the north of Topsham (policy 17).

Policy 17 – North of Topsham

The North of Topsham site is strongly supported. It has been subject to masterplanning (copy attached) undertaken by the landowners and which demonstrates that there is additional capacity to that which has been identified at this stage. Bearing in mind the concerns that we have expressed later in this letter about the ability to commence a new town in this plan period we recommend that the ability to capture this additional capacity should be realised.

The site currently provides some existing employment use and this can be expanded and upgraded as part of the delivery of this allocation.

We would be happy to discuss the masterplanning of the site in greater detail with the Council and would highlight the potential for early delivery of development.

General

Bearing in mind that the decision to proceed with the plan review was borne out of the ashes of the Greater Exeter Strategic Plan (GESP) we wonder, to what

extent, the housing need figure of 18,176 (that this plan review proposes to provide for) considers 'Exeter overspill' i.e. the extent to which Exeter, that is constrained by some key environmental considerations (such as flood plains) is unable to meet its' own housing needs and whether this plan seeks to meet any of that need?

Whilst we support the basic strategic vision of the plan (policy S1), we do have some comments/objection points that relate to the soundness of that strategy that we set out in this letter. For ease of presentation we have grouped the comments into generic comments, and site specific comments.

Generic

Western Side

To understand the policy the 'Western Side' needs to be defined on a map.

What is the difference between 'West End' (a term used in the existing Development Plan [DP]) and Western side'? To adopt the policy without such clarity would be contrary to the important principle of providing certainty in plan making and decision taking. Clearly the view is taken that significant development in the 'Western Side' of the district is sustainable. That rather begs the question about what is therefore the status of countryside policies in this part of the district (should it be the same as in the rest of the district?), and how important are the site boundaries? We consider that there should be some flexibility in the areas that adjoin, or are well related to existing settlement boundaries on the 'Western Side' of the district.

It appears that the preference is to commence development upon a second new town. However, experience demonstrates that any new town that is proposed now will not deliver before 2040 (Cranbrook was first allocated in February 1999. It then took circa 20 years to achieve occupations, post allocation). Thus, whilst not objecting to the principle of a second new town, per se, we would suggest that it should be considered little more than a 'direction of travel' only and that the 2,500 units proposed should be revised down to 500 (at most).

There is a concern that without a slightly more 'dispersed' strategy in this part of the plan area then the plan will fail to provide a range of deliverable sites, including smaller sites (as required by Government policy) and a high risk of failure and/or delay risking a consequential lack of a deliverable 5 year supply of residential land during the plan period.

These concerns also place emphasis on the importance of bringing forward the North of Topsham allocation as soon as possible.

Policy 40 - Affordable Housing

The level of affordable housing sought, at 35%, is reasonable if expressed as a target rather than a minimum figure. Dependent upon site circumstances (abnormal costs) there will be reasons that figure cannot be provided in all circumstances – but in the most part it's a reasonable target figure.

The differential % requirements proposed demonstrate the viability problems with delivering the 2nd new town during this plan period. Cranbrook was only deliverable due to the injection of considerable amounts of Government grant (to the gas fired energy centre, and via affordable housing funding and the Help to buy scheme) plus Government funding for upgrade of J29, M5.

Since meeting social needs is a key element of sustainability this demonstrates the ineffectiveness of a new settlement as a way of meeting identified housing needs i.e. large infrastructure costs mean it will deliver a lesser quantum (20%) of affordable housing than if sites were allocated elsewhere (via urban extensions to existing settlements).

It also has the effect of displacing those in housing need and placing a strain on family ties (e.g. meeting housing needs arising in Exmouth at Cranbrook).

We are also concerned that changing the mix of affordable housing to seek more social rent and less affordable rent etc will have a detrimental effect upon viability at the same time as the % target is increased. This emphasises the viability concerns in relation to the realism of the increased target.

Policy 43 – Housing Mix

This policy is flawed. It is based on out of date information. It fails to consider the needs of providing for home working, and it fails to consider that there a plethora of reasons why people may need space in their homes.

It also fails to consider that it's simply not possible to apply a blanket mix. For example some sites will be flatted only – how will those sites deliver 4 bed houses?

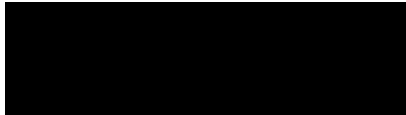
Policy 44 – Self Build

Providing self build on medium/large sites is a flawed concept. Those seeking such sites aren't looking for an 'estate' location. Perhaps a better approach is to allocate some small sites for that function?

Policy 87 – Biodiversity Net Gain

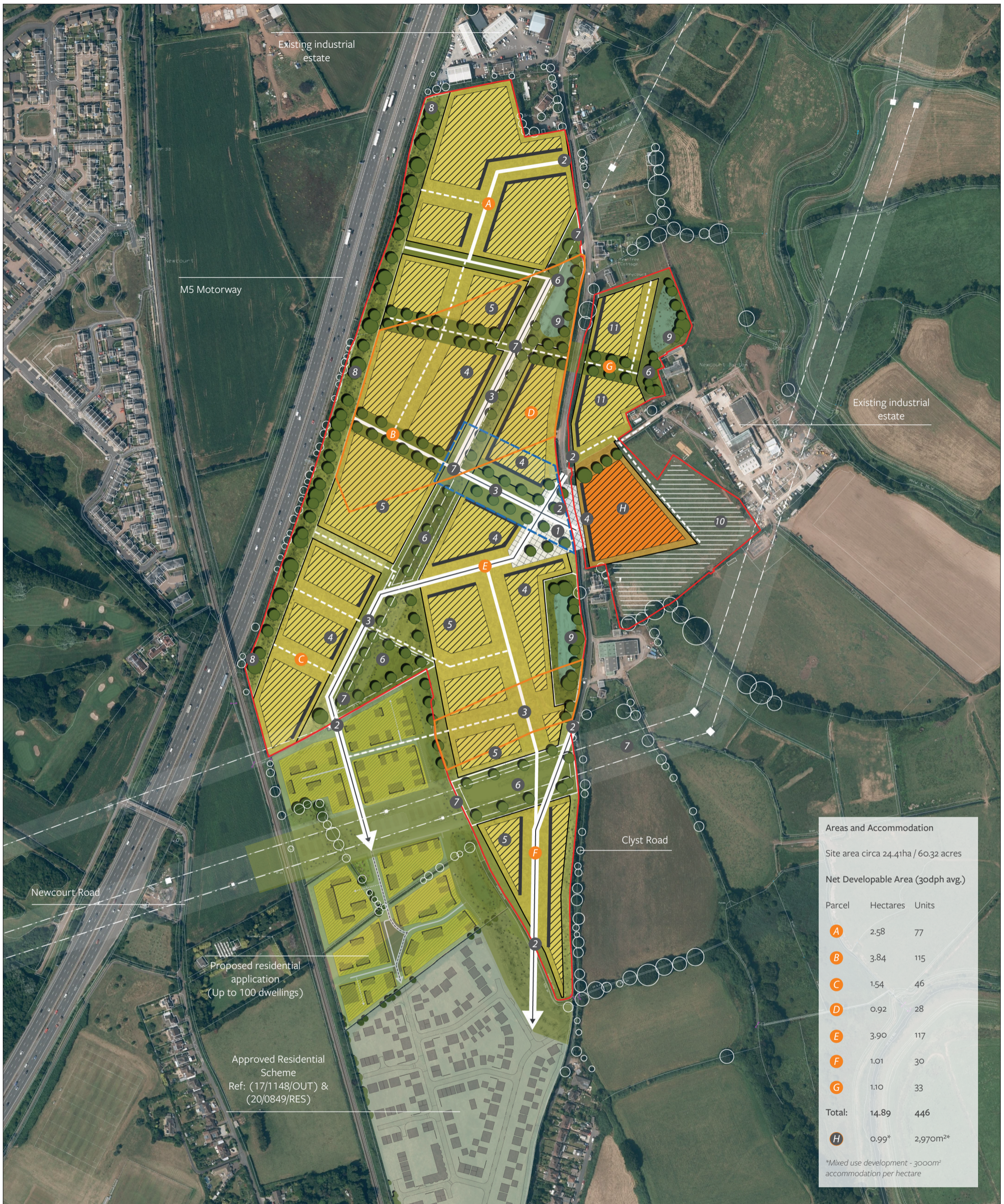
There is no justification for pursuing a target figure in excess of the national standard (10%). The national policy will have a significant detrimental impact on delivery, and will produce little in the way of substantive ecological benefits that would not occur anyway. Please don't exacerbate these problems in East Devon.

Kind regards,



David Seaton, BA (Hons) MRTPI
For PCL Planning Ltd





Areas and Accommodation

Site area circa 24.41ha / 60.32 acres

Net Developable Area (30dph avg.)

Parcel	Hectares	Units
A	2.58	77
B	3.84	115
C	1.54	46
D	0.92	28
E	3.90	117
F	1.01	30
G	1.10	33
Total:	14.89	446
H	0.99*	2,970m ² *

*Mixed use development - 3000m² accommodation per hectare

- Scheme boundary
- Proposed trees
- Existing trees
- Residential development parcels and frontage
- Mixed use development parcel
- ETL (Electrical Transmission Line / 15m offset)
- Location of alternative public realm option
- 1 Public realm intervention at the junction of Clyst Road
- 2 Vehicular access point
- 3 Primary route
- 4 Development fronting the primary route
- 5 Key development fronting the open space
- 6 Public Open Space (POS)
- 7 Green Infrastructure corridor
- 8 Landscape buffer and acoustic barrier to M5
- 9 Overground attenuation
- 10 Land under client ownership
- 11 Development fronting Clyst Road

Newcourt Barton, Clyst Road
Framework Plan

200802 L 02 01 NTS March 2021

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RJ/DH

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