

**East Devon Local Plan – 2021 to 2040 - Issues and Options consultation
for the attention of the Planning Policy team**

We would encourage you to complete the on-line response form – see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Please only use this paper version of the questionnaire if you lack internet access. Receiving on-line submissions will help us save time and money and will mean we can be more accurate in our work.

Your Title	MR	First name or initial	JAMES	Surname	MCMURDO
Your email address	[REDACTED]				
Your telephone number					
Your postal address and post code	Basement office, 4 Baring Crescent, Exeter, EX1 1TL				
Organisation name (if relevant)	MCMURDO LPD				
If you are an agent acting for a client please provide the name of your client	Mr and Mrs P Broom				

Your Age Range

- 0-18
- 19-25
- 26-40
- 41-55
- 56-70
- 70 plus

In what capacity are you responding to this consultation - what most closely describes you or if you are an agent what best describes, in respect of this consultation, what your client does?

- Private individual
- Environmental body
- Government department or agency
- Local authority
- Parish or town council
- Politician
- Religious body
- Cultural group or body
- Education provider
- Amenity group
- Land owner
- Developer
- Private company
- Emergency service provide
- Utility or transport provider
- Community or resident group
- Representative of commercial organisation or business
- Other – Please specify (in the box below)

Guidance notes

We have produced a local plan issues and options consultation document that we are consulting on from 18 January 2021 to midday on 15 March 2021. In the consultation document we include a series of questions. Please note that this questionnaire should be read alongside the full consultation document.

Please respond to this consultation event, on-line, if possible, see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Paper copies of this completed of this questionnaire should be posted to:

Planning policy
East Devon District Council
Blackdown House, Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

To arrive no later than 12.00 noon on Monday 15 March 2021.

Data Protection

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Please note that responses received will not be treated as confidential and they will be published on our council web site along with your name and if relevant the name of the organisation you represent. If you are an agent your name and organisation will be published as well as those of your client. Postal or email address will not be published unless they are embedded in documentation and cannot be readily blacked out.

Representations to East Devon Local Plan 2021 to 2040
Issues and Options Consultation January 2021
On Behalf of Mr and Mrs Broom Courtbrook Farm Clyst St
George and Land at Clyst St Mary

McMurdo LPD
a The Basement Office, 4 Baring Crescent, Exeter, EX1 1TL
e james@mcmurdolpd.com
t 01392 422297

Executive Summary

- It is in the interests of all concerned that East Devon's Local Plan is found “sound” at examination as soon as possible and our client supports the Council’s overarching objectives and general thrust of the East Devon Local Plan 2021 – 2040 Issues and Options Consultation, fully endorsing the Council’s proposed approach (to have a single Local Plan to deal with all policy issues).
- In line with Sustainability Appraisal (SA) work commissioned by it, the Council should continue to encourage development away from protected landscapes afforded the highest level of national planning policy direction (e.g. World Heritage Site; Area of Outstanding Natural Beauty (2/3 of the district is covered by an AONB designation)) and into less constrained areas of the district coincidentally where the vast majority of key physical, social and community and green infrastructure exists or is planned for.
- For the plan to be “sound” the Council should plan to build significantly more houses than 1,614 per annum, helping to meet ECC’s development needs, and creating plan resilience over time (in terms of e.g. housing land supply and affordability of homes).
- Given that it is very likely that the development needs of East Devon will have to be met via new towns and/or detached urban extensions (like Clyst Valley Garden Village), supplemented by large scale urban expansions to existing towns and villages (like Clyst St George and Clyst St Mary), the Council should plan for a longer period, extending the plan period in line with the draft NPPF which takes a minimum 15 year horizon forward stating (at Paragraph 22) “where larger scale developments such as new settlements form part of a strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years).”

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1. Introduction and Background

- 1.1. Mr and Mrs P Broom of Courtbrook Farm, Clyst St George (“client”) own significant land tranches free of restrictive planning constraints in the western part of East Devon. Some 250 acres of their land has been earmarked for strategic growth through the Greater Exeter Strategic Plan (GESP). (Please see Appendices 1 Clyst Valley Garden Village and 2 Client land at Clyst St George and 3 Client land at Clyst St Mary.)
- 1.2. Our representations should be read in conjunction with those made by Bell Cornwell LLP, in relation to the Clyst Valley Garden Village, on behalf of our client and others.

2. Relevant National Planning Policy

2.1. In the preparation of this document our client has paid particular attention to the content of the National Planning Policy Framework (“NPPF” “Framework”) and in particular Paras 7-11,16,-27¹, 31-35 and 72 of it.

¹ NPPF 2021 draft at Para 22 states that a 30-year time horizon is appropriate if a Council’s strategy involves e.g. new settlements and detached urban extensions

3. Response to Issues and Options

Question 1 - Local Plan Objectives

Response

- 3.1. Broadly, our client endorses these laudable objectives but may take issue with them if they are in numbered priority order.

Question 2 – The Scope of the Local Plan

Response

- 3.2. Our client fully endorses the Council's proposed approach (to have a single Local Plan to deal with all policy issues).

Question 8 - How many new homes should we plan for each year?

Response

- 3.3. This is not a straightforward district wide issue: EDDC will have to demonstrate that it has worked collaboratively with, amongst others, Exeter City Council (ECC) (“duty to co-operate”). And, based on a thorough analysis of the options ECC is pursuing in this regard, land in East Devon district will be required to meet a significant portion of ECC's identified development needs.
- 3.4. On that basis alone, unfortunately, neither Option 1 nor Option 2 are credible options for the Council to pursue. Option 1 (918 hpa) does not align with “Government thinking” and whilst Option 2 (1614 hpa) does, it does not take into account the “duty to cooperate” with a city neighbour that cannot meet its identified development needs.²
- 3.5. For the plan to be “sound” a bespoke Option 3 should be pursued. Such an option (or options) should plan to build significantly more houses than 1614 per annum, helping to meet ECC's development needs, and creating plan resilience over time (in terms of e.g. housing land supply and affordability of homes)

² National Policy and Guidance advises that Local Housing Need Standard Methodology is a minimum requirement.

Question 9 - Sites for Small Scale Housing Developments

Response

3.6. Our comments on spatial strategy and development hierarchies are elsewhere in these representations, however, the lower end of option 2 should be the route that the Council takes because:

- it will only attain the housing numbers it needs via e.g. new towns and significant scale detached urban extensions (to Exeter) supplemented by large scale urban extensions to existing towns and villages, like Clyst St Mary and Clyst St George; and,
- 10% is the minimum level as required under NPPF Paragraph 68.

Question 19 - The Importance of Conserving and Enhancing Heritage Assets and Question 20 - Development in Protected Landscapes

Response

3.7. Legislation and National planning policies together mean that it is “very important” for the Local Plan to “conserve and enhance” heritage assets but that does not mean that development cannot happen which affects such assets: impacts on heritage assets can sometimes be acceptable in planning terms.

3.8. Our client believes that the Council, in line with Sustainability Appraisal work commissioned by it, should continue to encourage development away from protected landscapes afforded the highest level of national planning policy direction (e.g. World Heritage Sites; Areas of Outstanding Natural Beauty; 2/3 of the district is covered by an AONB designation) and into the “West End” of the district and areas close by where the vast majority of key physical, social and community and green infrastructure exists or is planned for.

3.9. In this vein, papers from the Council’s Strategic Planning Committee from 2018, confirm that “the least constrained part of the district for accommodating... [strategic housing and employment] ... growth... [is]...the land...[which]...is relatively flat with no landscape designations... [and which] ... is well served by main roads with good vehicle access via the M5, A30, A3052 and **A376** and has good existing public transport links with the railway line and existing bus routes...”

Question 21 - Net Gains in Biodiversity

Response

3.10. Option 4: “a combination of the above” will almost certainly be required.

Question 22 - Additional Natural Environment Policy Objectives

Response

- 3.11. In principle, our client fully supports additional natural environment policy objectives (such as the Clyst Valley Regional Park Masterplan) **provided they are examined as part of the Local Plan.**

Question 23 - Promoting Accessibility by Walking and Cycling and Question 24 - Additional Sustainable Transport Policy Objectives

Response

- 3.12. A blend of Options 1 and 2 is required.
- 3.13. Aggressive multi modal splits are best achieved by locating strategic developments into areas where the vast majority of key physical, social and community and green infrastructure exists or is planned for. The Council acknowledges that for East Devon that means locating strategic developments in its “West End” and/or close to it. Our client fully supports all sustainable transport policy objectives.

Question 25 - Facilities and Services That are Important and Question 26 - Additional Infrastructure and Service Provision Policy Objectives

Response

- 3.14. From the Cranbrook Plan examination and the Inspectors guidance to the Council in relation to it, it is clear that facilities and services (infrastructure) that are required to make development acceptable in planning terms is not the same as a “wish list”.
- 3.15. In this vein, the Council will know that:
- Planning Practice Guidance advises that it should “engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage”;
 - Paragraph 34 of the National Planning Policy Framework (Framework) advises that plans should set out the contributions expected from development and that such policies should not undermine the deliverability of the plan,

and our client looks forward to further dialogue with the Council and other stakeholders as the plan advances.

Question 27 - Retaining and Refining the Existing Settlement Hierarchy, Question 28 - Broad Distribution of Housing Development, Question 29 - Future Options for the Type and Location of Development Question 30 - Establishment of a Development Corporation Question 31 - Planning for Development Beyond 2040

Response to Q 27,28,29,30,31

- 3.16. We suggest that for settlement hierarchy the Council should pursue a bespoke Option 4 based on Option 2, to be informed and tested by a Sustainability Appraisal (SA) (though there is no reason to suggest that the findings of that Sustainability Appraisal would be different to the findings of the SA underpinning the existing Local Plan), all of which would probably lead to planning for one or more additional new towns and/or detached urban extensions (to Exeter) in East Devon's "West End" or close to East Devon's "West End", like Clyst Valley Garden Village, supplemented by development in the form of large scale urban expansions to existing towns and villages, like Clyst St Mary and Clyst St George.
- 3.17. Regarding the creation of a development corporation the reasons given for such in the issues and options consultation papers are not relevant in East Devon so far as our client can see. (e.g. there is no need for "Master Developer"; the market has acquired positions on land without help from a development corporation; planning controls exist to ensure proper Masterplanning and to prevent financial burdens on future residents; and state funding can be effectively secured by strong public/ private sector partnerships).
- 3.18. Given that it is very likely that the development needs of East Devon will have to be met via new towns and/or detached urban extensions (like Clyst Valley Garden Village), supplemented by large scale urban expansions to existing towns and villages (like Clyst St George and Clyst St Mary), the Council should plan for a longer period, however, and extend the plan period in line with the draft NPPF which takes a minimum 15 year horizon forward stating (at Paragraph 22) "where larger scale developments such as new settlements form part of a strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years)..." (Development corporations may have a role to play in such a time horizon.)

Question 32 - And finally...?

Response

- 3.19. No more comments at this stage.

4. Conclusions

- Our client fully endorses the Council's proposed approach to have a single Local Plan to deal with all policy issues.
- Strategic housing (like Clyst Valley Garden Village) and employment development should be located in the "West End" of East Devon and/or close to it where the vast majority of key physical, social and community and green infrastructure exists or is planned for.
- More than 1,614 houses per annum will be required, in particular to help meet ECC's development needs.
- Large scale urban extensions to towns and villages, such as Clyst St George and Clyst St Mary, will be required to supplement strategic growth.
- The plan period should be extended to at least 30 years.

5. Appendices

Appendix 1

Clyst Valley Garden Village Issues & Options

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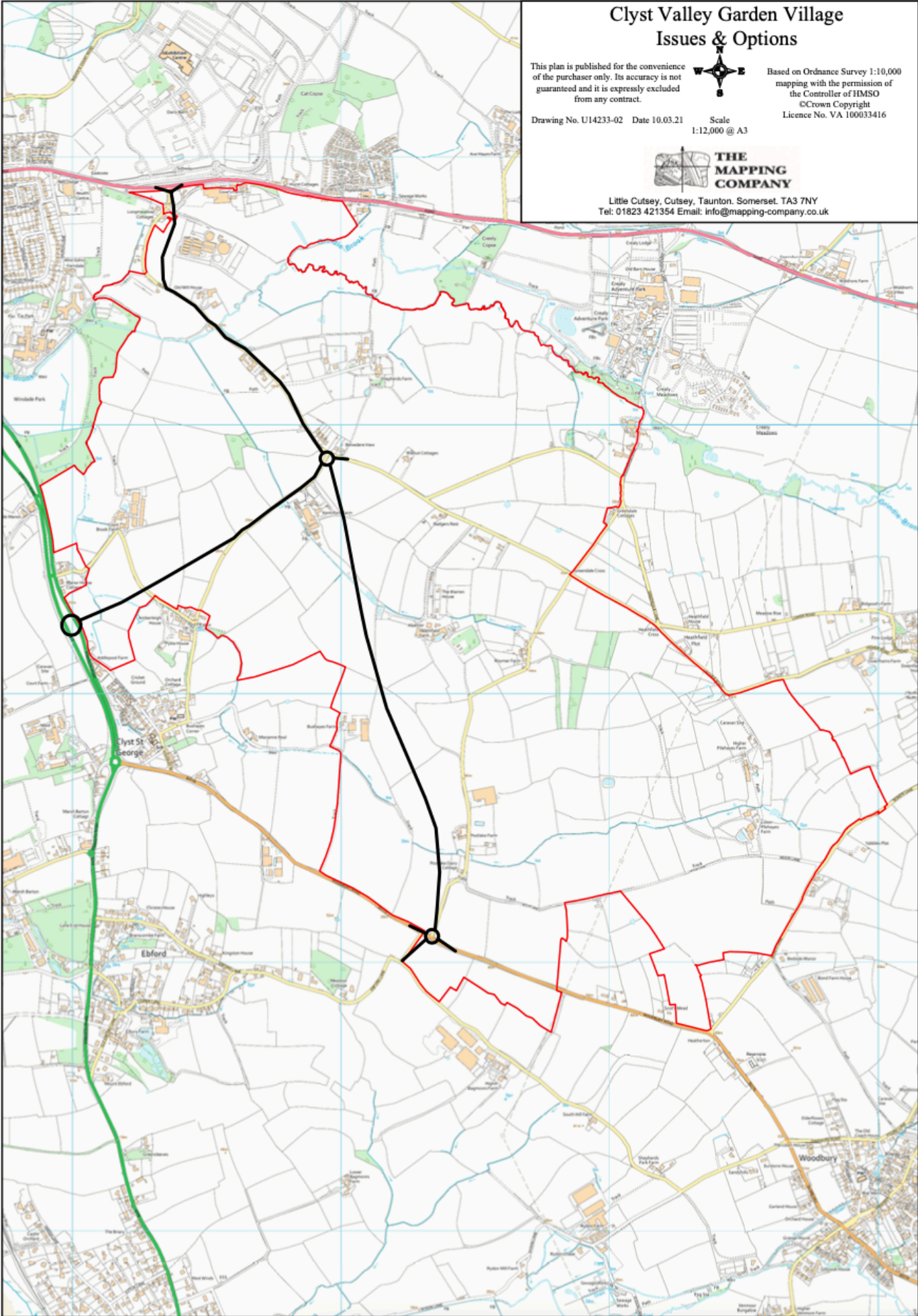


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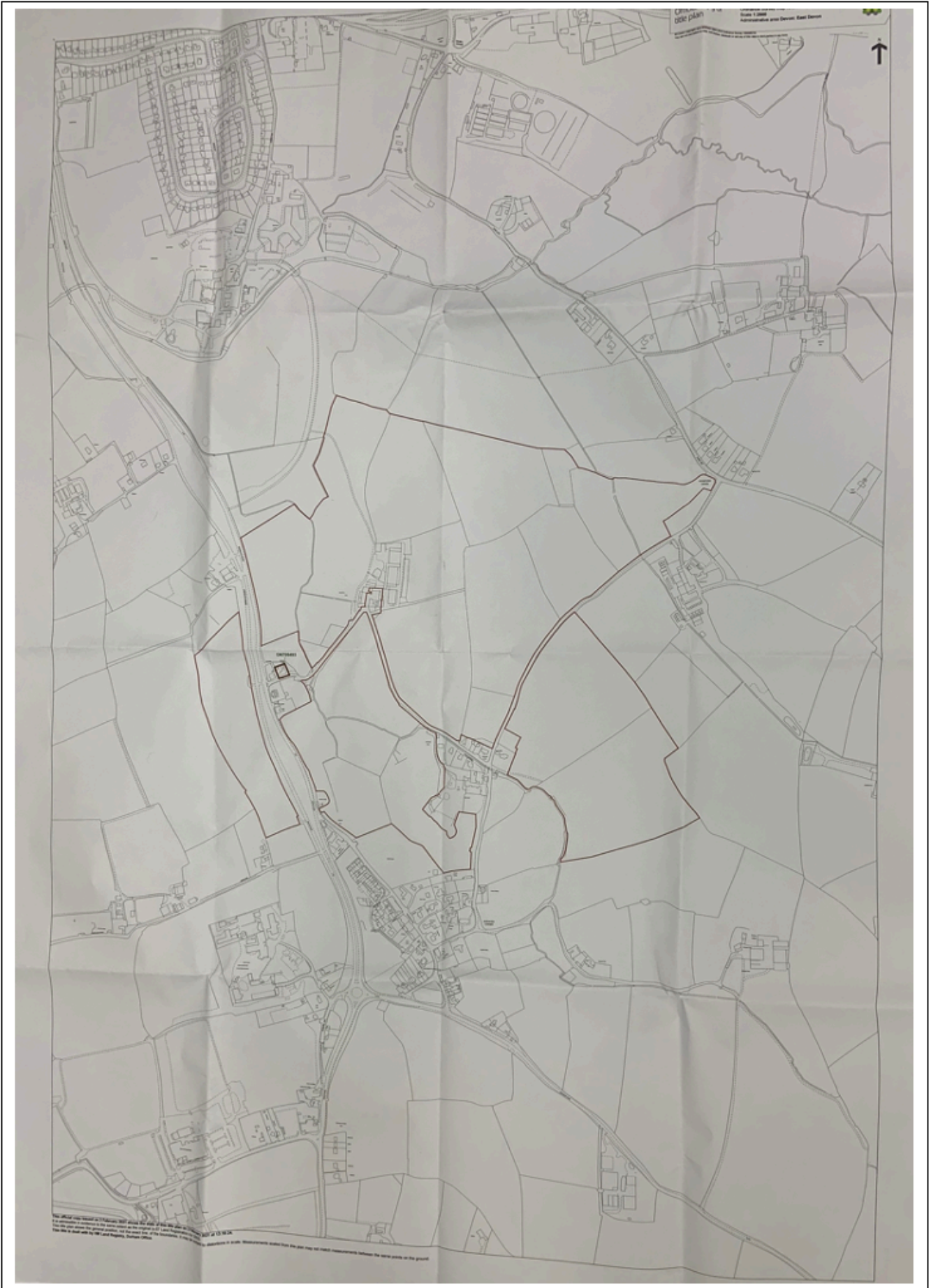
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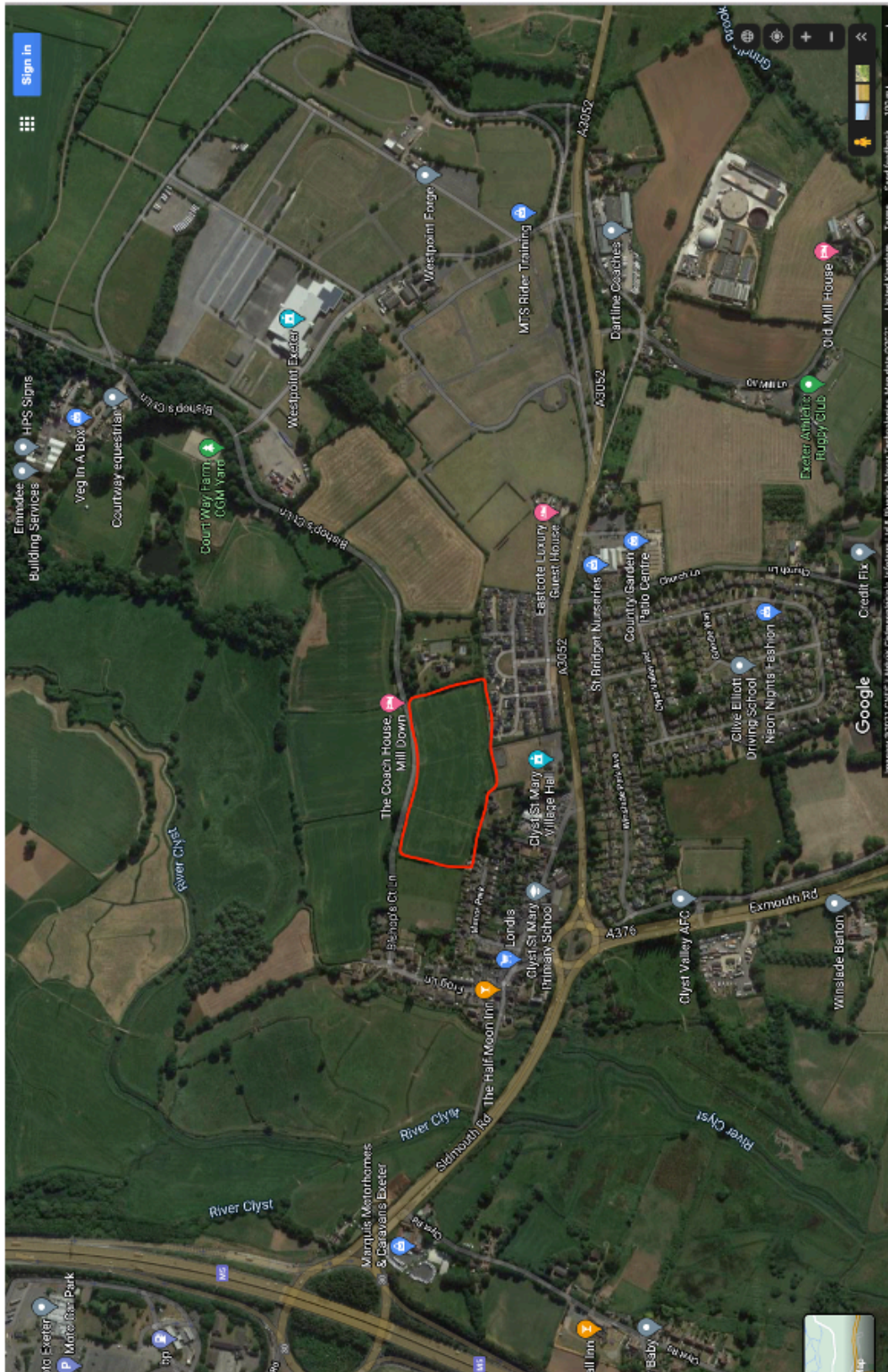


Appendix 2



Appendix 3

Land at Clyst St Mary



McMurdo LPD

The Basement Office,
4 Baring Crescent,
Exeter,
EX1 1TL

James McMurdo MRTPI MRICS

Director

e james@mcmurdolpd.com
t 01392 422297