
East Devon Local Plan

Representations to the Regulation 18 Consultation (March 2021)

Land to the south of Clyst Honiton, Exeter

On behalf of **Land Value Alliances LLP**

Prepared by: Daniel Millward

EAST DEVON LOCAL PLAN

REPRESENTATIONS TO THE
REGULATION 18 CONSULTATION

LAND TO THE SOUTH OF CLYST HONITON, EXETER

ON BEHALF OF LAND VALUE ALLIANCES LLP

Prepared by: Daniel Millward

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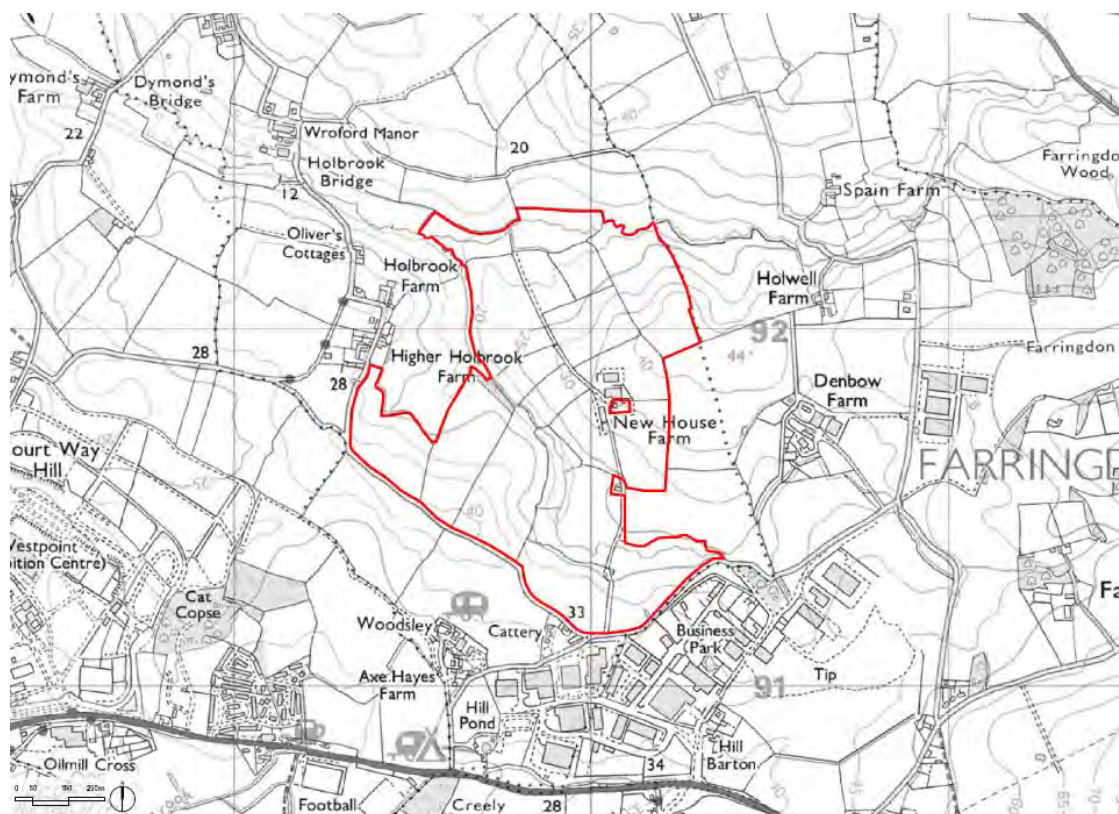
APPENDICES:

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1. INTRODUCTION

1.1 Pegasus Group is instructed to submit representations to the East Devon Local Plan Regulation 18 Consultation on behalf of Land Value Alliances (LVA) LLP. LVA control around 70ha of land to the south of Clyst Honiton between the A30 (north) and the A3052 (south). The site would be suitable for a sustainable new settlement within the West End of the district.

1.2 A site location plan has been provided as an appendix.



APPENDIX X/FIGURE 1: SITE LOCATION PLAN

Structure of the Representations

1.3 These representations are structured around the following Chapters:

- Chapter 2: Objectives, Scope and Background;
- Chapter 3: Designing for Health and Wellbeing;
- Chapter 4: Tackling the Climate Emergency;

- Chapter 5: Meeting Housing Needs;
- Chapter 6: Supporting Jobs and the Economy;
- Chapter 10: Our Outstanding Natural Environment;
- Chapter 11: Promoting Sustainable Transport;
- Chapter 13: Developing a Strategy for the Distribution of Development.

1.4 We have also made some brief comments on the Sustainability Appraisal Scoping Report and provided some additional information on LVA's land.

1.5 An executive summary of the key points within these representations is provided below:

Chapter 2 - Objectives, Scope and Background

- We are supportive of the preparation of a single Local Plan and the objectives that have been identified on the basis that this will provide certainty and clarity from the outset for developers.

Chapter 3 – Designing for Health and Wellbeing

- Planning for health and wellbeing is important and this can be supported by promoting active transport modes in accessing jobs, infrastructure and services and delivering diverse areas of high-quality open space in new developments. Comprehensively planned and sustainably located new settlements are especially good at delivering this due to their scale.

Chapter 4 – Tackling the Climate Emergency

- We support policies which seek to deliver zero carbon homes as long as this is aligned with forthcoming government legislation and subject to a robust viability assessment.
- Any policies need to have clearly defined thresholds so it is clear to both applicants and decision takers what is and is not acceptable.

Chapter 5 – Meeting Housing Needs

- Affordable housing need, the duty to co-operate with Exeter and recent/projected rates of delivery would all justify a higher requirement than identified by the Standard Methodology (928 dpa) being adopted.
- We would support an ambition to address all affordable housing needs over the plan period and so a requirement in the region of 1,614dpa (Option 3) would be supported on this basis.
- Whilst small scale housing developments will have a role to play, the need to deliver sustainable patterns of development will likely mean there should be a greater reliance on larger strategic sites. Whilst this will be informed by the SA process, it is our view that facilitating proportionate levels of growth at the main towns and larger villages would likely not require the identification of site allocations to address more than 10% of the overall requirement.
- Small scales of development will also be poorer at meeting specialist housing needs over the plan period, whilst larger scales of development allow for more opportunities to deliver a range of bespoke housetypes alongside traditional housing.

Chapter 6 – Supporting Jobs and the Economy

- We agree that the greatest levels of demand for employment growth will be within the West End, close to Exeter and the M5 motorway.
- It is imperative that new housing is brought forward alongside additional employment floorspace in order the negative aspects of commuting by private motor vehicle and improve accessibility to jobs. This is another strong reason why new housing growth should be focused on the West End.

Chapter 10 – Our Outstanding Natural Environment

- Protected landscapes (namely AONBs) should be protected in line with guidance set out in the NPPF. indicates that development in AONBs should be restricted (although not prohibited), significant levels of growth here would not be supported.

- There are a handful of ways in which BNG can be secured, all of which would be supported. However, we would note that an advantage of large scale strategic development is that it is capable of delivering BNG without the need to access third party land.

Chapter 11 – Promoting Sustainable Transport

- A combination of small scale development in locations with good access to existing services and facilities and large scale development with the potential to deliver a range of services and facilities alongside housing will likely be required to ensure sustainable transport patterns are delivered.
- Given that the need to commute is the most significant driver of travel, a greater emphasis should be placed on development in locations with good access to employment opportunities (i.e. the West End of the district).

Chapter 13 – Developing a Strategy for the Distribution of Development

- The adopted plan's success in meeting the district's housing requirement indicates that the existing spatial strategy would likely be appropriate for meeting similar levels of development.
- The two other options should be assessed through the SA. A distribution strategy which reduces the level of development in the West End will perform poorly in sustainability terms given that greater pressure will be placed on more sensitive parts of the district, whilst also being poorly related to important employment and services centres.
- Furthermore, a higher housing requirement would likely require a greater emphasis on development in the West End due to the constraints associated with delivering housing elsewhere within the district.
- A range of sources will be required to meet the development needs of the district over the plan period; however, the need to focus on the West End means that the delivery of new settlements (villages or new towns) is strongly supported.

- The creation of a Development Corporation is *unlikely* to be supported on the basis that it would not be needed to delivering strategic growth in the West End.
- We would not object to the proposed plan period; however, we would support an extension to it, primarily if this was deemed necessary to justify a higher housing requirement to address affordability issues within the district.

Sustainability Appraisal (SA) Scoping Report

- There is a concern as to how land for new villages/towns will be assessed when it comes to individual site assessments. There needs to be recognition that access to services, facilities and public transport connections will be delivered, even if none exist at present.

Land to the south of Clyst Honiton, Exeter

- LVA control 70ha of land to the east of Exeter, between the A30 and the A3052. Exeter Airport lies to the north, whilst the Hill Barton Business Park abuts the site along its southern boundary.
- The site forms part of a wider area considered for development within the GESP and its proximity to existing employment centres (including Exeter), coupled with the potential benefits from a series of transport interventions make it an excellent candidate for allocation in the new Local Plan.
- The site would be capable of delivering one of a cluster of sustainable and interconnected new villages within the West End or forming part of a larger new town. LVA will be compiling a body of technical work and engaging collaboratively with adjacent landowners to present a vision for the wider area over the next few months.

2. CHAPTER 2 - OBJECTIVES SCOPE AND BACKGROUND

Question 1: Local Plan Objectives

- 2.1 We are supportive of the objectives identified, particularly that which seeks to meet future housing needs.

Question 2 – The Scope of the Local Plan

- 2.2 We support the creation of a single, comprehensive plan for the district on the basis that this creates certainty and clarity from the outset for developers. Subsequent rounds of plan review can take advantage of monitoring and analysis to inform potential adjustments to certain policies or identify additional site allocations.
- 2.3 There will; however, also need to be scope for Neighbourhood Plans to come forward to deal with local matters and so the Local Plan should ensure this is clearly defined.

3. CHAPTER 3 – DESIGNING FOR HEALTH AND WELLBEING

Question 4 – Planning for Health and Wellbeing

- 3.1 We believe that is very important to actively promote health and wellbeing throughout the new Local Plan. This will be achieved through ensuring that new development provides appropriate quantities and types of outdoor recreation space. A significant advantage of strategic scales of development is the scope to deliver significant areas of open space, including: new country parks, wildlife areas, playing pitches, equipped play areas and allotments (among others). Convenient access to high quality areas of open space would help to promote healthy and active lifestyles.
- 3.2 New open space and areas for recreation should be provided at a commensurate level, relative to the amount of residential or other type of development that is planned in conjunction with them.
- 3.3 It will also be important to ensure that opportunities for walking and cycling are maximised in terms of accessing services, facilities, employment opportunities and public transport. Whilst the pandemic will no doubt have long-term impacts on how some of us work, there will still be a need for people to travel to/from places of work. Whilst we would expect to see levels of home-working increase over the long-term, there are certain professions and industries where homeworking simply is not possible. The pandemic has not provided a justification to deviate from the principle of creating balanced, walkable and diverse communities in sustainable and accessible locations.
- 3.4 Development which delivers a range of uses and is well related to existing employment sites or centres will be more likely to maximise opportunities for walking and cycling and, therefore, promote healthy and active lifestyles as a result.

4. CHAPTER 4 – TACKLING THE CLIMATE EMERGENCY

Question 5 – Energy Efficiency of new buildings

- 4.1 We support the ambition to deliver net zero carbon standards for development assuming that this is subject to a robust viability assessment. Any policies which seek to achieve this will need to be mindful of the proposed changes to national planning policy and forthcoming regulatory changes which will have an impact on their scope. These changes relate to zero carbon ready homes, as well as biodiversity net gain, broadband provision and electric vehicle charging.
- 4.2 Forthcoming legislation is expected on all of these elements following consultations **undertaken over the last few years. This is based upon the Government's intention** of creating a standardised national approach on these elements through changes to the building regulations and other wider legislative changes to ensure that the imposition of varied local standards does not undermine the delivery of housing in the short/medium term.
- 4.3 We would support a policy requiring net-zero carbon homes from the adoption date of the plan, assuming this aligned with the progression of these legislative changes.
- 4.4 Whatever policy does come forward, it will need to make sure that any terminology is clearly defined as terms like 'zero carbon' and 'carbon neutral' do not have universally understood definitions.
- 4.5 Furthermore, any policy will need to be explicit in establishing a clear threshold (which has been subject to viability testing) for developers and decision takers so there is no ambiguity around what standards need to be achieved. It will need to be clear to both applicants and decision takers when the terms of the policy have and have not been met to avoid unnecessary debate at the planning application stage.

5. CHAPTER 5 – MEETING HOUSING NEEDS

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

- 5.1 The starting point in establishing the minimum housing requirement for an area is the Standard Method. Option 1, therefore, represents the absolute *minimum* housing requirement that would need to be planned for until 2040.
- 5.2 However, there may be factors which indicate that it might be appropriate to plan for a higher housing need than the Standard Method currently indicates. One such factor identified is the need to address affordability issues within the district. Given that there is a need to provide around twice as many affordable dwellings annually within the district than are currently being built, this would certainly justify uplifting the housing requirement to help meet this need. Indeed, the 1,614 dwellings per year figure which was identified in the government's now withdrawn revision to the Standard Method was largely because affordability issues within East Devon are particularly dire.
- 5.3 Furthermore, there may be a need to assist Exeter in accommodating some of its housing need due to the limited availability of land within Exeter's administrative boundary. East Devon's withdrawal from the GESP does not absolve it of the duty to co-operate and so engagement with Exeter and the other GESP authorities should be undertaken to understand the extent to which there may be a need to assist with meeting others' development needs.
- 5.4 The question is whether such a significant jump in housing delivery would be deliverable. As set out at paragraph 5.3 of the Consultation Document, it is anticipated that around 12,000 new homes will be delivered by 2031. This would equate to the delivery of around 1,085 dwellings per year. This is against an adopted annual requirement of 950 dwellings and the latest Standard Method's figure of 928 dwellings.
- 5.5 We would note that 1,065 dwellings were delivered in 2019/20 and the trajectory anticipates delivery to reach around 1,300 dwellings per year in 2020/21 and 2024/25.¹ On this basis, it is considered that delivering around 1,200 dwellings per year, as identified in Option 2 would be eminently plausible.

¹ See: <https://eastdevon.gov.uk/media/3721230/housing-monitoring-update-to-year-end-31-march2020.pdf>

- 5.6 This also means that the step up to delivering c.1,600 dwellings per year is likely achievable, although further analysis would need to be undertaken to confirm this. Subject to this being shown to be achievable, we would support this higher annual figure set out at Option 3 on the basis that it was achievable and would address affordability issues.
- 5.7 If there were concerns regarding delivering this higher requirement, then an alternative approach could be to extend the plan period beyond 2040. This would allow the Local Plan to deliver the necessary uplift over a longer period of time to address the effective backlog of affordable housing. Whilst this would uplift the housing requirement overall, the annual requirement would decrease proportionately. This would potentially be worth exploring further.

Question 9 – Sites for Small Scale Housing Developments

- 5.8 The need to deliver sustainable patterns of development within East Devon is the single biggest factor in determining the scale of development that should come forward on smaller sites. The key advantage of smaller sites is that they are able to come forward quickly and can help to underpin housing delivery on larger sites which typically have long lead in times.
- 5.9 Small greenfield sites specifically are also generally free of major viability constraints meaning that they can be relied upon to deliver policy compliant levels of affordable housing.
- 5.10 The problem is that small sites are often coming forward at existing settlements where there may be pressures on existing infrastructure (e.g. primary school capacity) or accessibility to a comprehensive range of services, facilities and employment opportunities would require access to the private motor vehicle (e.g. smaller, rural villages).
- 5.11 Furthermore, small scale development cannot take advantage of economies of scale to deliver significant infrastructure benefits (new schools, roads, public transport infrastructure etc). The need to deliver BNG on site can also lead to inefficient uses of land which can be more efficiently delivered on larger sites.

5.12 There will, no doubt, be a role for small scale sites in helping to deliver the housing requirement whilst maintaining the vitality and viability of more rural communities. However, this needs to be balanced against the imperative to deliver sustainable patterns of development and maximise the efficient use of land to achieve the identified objectives of the plan.

5.13 Ultimately, these options should be tested through the Sustainability Appraisal process, which will provide an indication as to the scale of growth that should be delivered on smaller sites. We will wait to see the outcome of this process before commenting further in detail.

5.14 However, larger numbers of smaller sites would likely lead to less significant levels of growth coming forward in the West End where opportunities for small scale development are limited. This would, in turn lead to greater pressures on settlements further removed from Exeter and potentially those within the Blackdown Hills or East Devon AONBs where development should be restricted. As such, we would expect Options 3 and 4 to perform poorly when assessed against reasonable alternatives (i.e. Options 1 and 2) as part of the SA process, which would necessitate larger scale strategic development in the West End.

Indeed, it is our view that facilitating proportionate levels of growth at the main towns and larger villages would not require the identification of site allocations to address more than 10% of the overall requirement. We would, therefore, support Option 1 on this basis.

Question 10 - Planning for housing for people at all stages of their life

5.15 Ensuring an appropriate mix of housing is delivered across the district should be a priority for the plan. Regardless of the approach that is ultimately taken, this should be informed by a Housing Needs Survey, Strategic Housing Market Assessment or similar evidence. There should be a policy requiring proposals to have due regard to this evidence base as they come forward with a degree of flexibility built in as different mixes/types of housing may be required in different locations.

5.16 What should be noted is that it can be difficult to secure a diverse range of housing types (e.g. starter homes, specialist housing for older people and apartments) on small scale sites. It is much easier to deliver a broad range of housing and house types on large strategic sites where the scale of development would support the

delivery of starter homes, care homes, apartment buildings, wheelchair accessible dwellings, multi-generational housing etc alongside traditional homes.

- 5.17 A requirement could be set out in district wide or site-specific policies where a certain threshold is reached to secure a proportion of bespoke housing types on larger sites. Appropriate phasing and partitioning within large sites will avoid the deliverability and implementation issues.
- 5.18 This could be twinned with a more permissive approach to bespoke housing developments which could be permitted in locations where traditional housing is considered to be unacceptable (e.g. adjacent to settlements within certain tiers and subject to meeting clearly defined criteria). South Oxfordshire's recently adopted Local Plan provides an example of how this could be applied to specialist housing for older people.

6. CHAPTER 6 - SUPPORTING JOBS AND THE ECONOMY

Question 12 – Preference for location for future job provision

- 6.1 There is a degree of uncertainty as to what the impacts of Covid-19 will be on the demand for employment space will be over the longer-term. The likelihood is that demand will reduce for traditional office space with a greater emphasis on home-working will emerge over the longer-term. However, it seems unlikely that demand for B2 and B8 uses will diminish or increase based on the long-term impacts of the pandemic and these will be influenced by wider economic trends and market signals.
- 6.2 The key to any approach will be flexibility and ensuring land is available for development, depending on shifting levels of demand over the plan period. A review of existing employment sites, particularly those identified in the latest local plan should be carried out to understand what the likely take up for additional floorspace in these locations will be and the scale and type of new employment sites that will be required.
- 6.3 However, we agree with the consultation document's suggestion that demand will be greatest in the West End around Exeter and the M5 motorway for obvious reasons.
- 6.4 Wherever new employment floorspace comes forward, it is imperative that it is supported by new housing. Transport is a key source of carbon emissions and commuting is a significant factor in the need to travel. This can be reduced where realistic walking, cycling and public transport connections can be provided to important centres of employment. The development of the Exeter Science Park alongside housing at Blackhorse is an excellent example of an attempt to achieve a balance between employment and residential uses to promote sustainable modes of travel.
- 6.5 An alternative approach could be to identify opportunities to deliver residential development at existing locations where there is already an established employment base. There is an opportunity on land adjacent to the Hill Barton Business Park, a relatively isolated but significant employment site within the West End. The delivery of housing in close proximity to this important business site could both support its further expansion, whilst also promoting opportunities for walking and cycling to/from work and reduce car dependence in terms of access to jobs

and services. This not only has environmental benefits, but social and economic as well by increasing residents' access to job opportunities within the local area.

- 6.6 In short, we are supportive of an approach which would direct future jobs growth to the West End where demand will likely be greatest. Furthermore, additional employment growth should be linked with housing growth in order to promote sustainable patterns of travel, improve accessibility to employment and achieve a critical mass to support further jobs growth. Land controlled by LVA abuts the Hill Barton business park within the West End area and therefore makes it a logical location to deliver housing and other uses in line with a strategy based on this approach.

7. CHAPTER 10 – OUR OUTSTANDING NATURAL ENVIRONMENT

Question 20 – Development in protected landscapes

- 7.1 Protected landscapes should be protected in line with guidance set out in the NPPF and PPG. The Local Plan should not, for example, deviate or reinterpret the relevant guidance on development within AONBs, although it may wish to provide clarity for proposals within these designated areas.
- 7.2 Given that current national guidance indicates that development in AONBs (the main constraint to development in the central/eastern parts of the district) should be restricted (although not prohibited), Option 3 would not be supported.

Question 21 – Net gains in biodiversity

- 7.3 A wholistic approach should be used to deliver biodiversity improvements across the district. On-site provision should be the preferred route to securing biodiversity net gain on larger development schemes. Large strategic sites in particular are able to integrate large new areas of wildlife and habitat creation within high quality public open space making them especially effective and reliable at delivering biodiversity net gain alongside new housing.
- 7.4 Smaller scale development is able to deliver biodiversity net gains on site; however, the complexities, scale or location of development may mean this is not the most efficient way of doing so. This is where off-site habitat creation or bespoke S106 payments could be used to secure the necessary BNG whilst maximising the efficient use of land.
- 7.5 For minor development, the Council may wish to utilise S106 or CIL contributions to fund a strategic delivery scheme so that the cumulative impacts of small-scale development also supports the delivery of BNG.
- 7.6 In short, delivering BNG on large strategic sites is relatively straightforward and requires minimal intervention from the Local Authority to delivery and maintain. However, we acknowledge that there are a range of viable solutions that could be utilised to deliver BNG in a more comprehensive and wholistic way. As such, Option 4 would therefore be a preferred approach to delivering BNG.

8. CHAPTER 11 - PROMOTING SUSTAINABLE TRANSPORT

Question 23 – Promoting Access to Facilities

- 8.1 The adoption of Option 4 as a 'guiding principle' would not be supported on the basis that it would do nothing to reduce the reliance on the private motor vehicle. There will be a need for proportionate levels of growth to come forward at smaller rural villages to support their vitality and viability and this will necessitate development to come forward with a certain level of dependence on the private motor vehicle to access a full range of services and facilities.
- 8.2 Options 1 and 2 are not viable in and of themselves. Small clusters of growth at existing locations could be sustainable; however, it is unlikely that this would effectively meet the development needs of the district. Development in certain locations may be restricted by the capacity of existing services to support new development which again, may limit the overall scale of development that could be delivered.
- 8.3 Strategic development locations can be comprehensively planned to ensure that additional services and infrastructure come forward in line with housing which can make a significant contribution to sustainably meeting the district's development needs. Whilst their scale allows them to make a significant contribution to housing delivery over plan period, they are not without their drawbacks (such as long lead in times) and so should not be relied on to deliver the entire housing requirement over the plan period.
- 8.4 Both have the capability to promote sustainable travel patterns, especially where this is combined with new employment land. However, a balance will need to be struck between the two in terms of ensuring a deliverable supply of housing land is available over the entirety of the plan period. We therefore support Options 3 which is a combination of these two approaches.

9. CHAPTER 13 – DEVELOPING A STRATEGY FOR THE DISTRIBUTION OF DEVELOPMENT

Question 27 - Retaining and refining the existing settlement hierarchy

- 9.1 We don't really have a preference for the approaches identified. Settlement hierarchies are usually based on an assessment of the overall sustainability of individual settlements and their capacity to accommodate further growth. For example, Colyton is technically a town but has been classed as a village on the basis of an assessment of its relative sustainability.
- 9.2 An assessment should be undertaken using the adopted Local Plan hierarchy as a starting point to consider whether there is any merit in increasing or reducing the number of settlements identified in the interest of apportioning an appropriate level of growth to them.
- 9.3 However, do not see an obvious reason to revisit the adopted hierarchy at this time.

Question 28 – Broad distribution of housing development

- 9.4 Since the plan's adoption in 2016, the Council have been able to demonstrate an up-to-date supply of housing land, with the current position stated as being 5.73 years. Furthermore, the Council's performance against the Housing Delivery Test is currently 122%, which confirms housing delivery is exceeding the minimum annual requirement. This indicates that the current local plan has largely been successful in meeting the identified housing targets.
- 9.5 This in turn suggests that the current distribution has been shown to be a reasonably sound approach in terms of delivering the development needs of the district. Rolling forward the adopted strategy would, therefore, be an appropriate starting point from which to consider alternative options.
- 9.6 The two other options identified will, presumably, be the reasonable alternatives assessed through the Sustainability Appraisal (SA) process. We would support the identification of these two options which are sufficiently different from rolling forward the adopted strategy to warrant consideration.

- 9.7 We will wait until the options have been assessed under the SA process before commenting in detail; however, it is likely that there will be significant sustainability benefits to identifying higher levels of growth within the West End given the potential to deliver housing in close proximity to Exeter and important employment sites at Blackhorse, Exeter Airport and Hill Barton Business Park.
- 9.8 The Council's experience in delivering successful new communities at Cranbrook and Blackhorse should provide confidence that additional new settlements could be delivered in this location, if a higher target were identified for the West End.
- 9.9 We would also suggest that a distribution strategy which reduces the level of development in the West End will perform poorly in sustainability terms given that greater pressure will be placed on more sensitive parts of the district, whilst also being poorly related to important employment and services centres. Therefore, we would not support Option 3 and are more likely to support Options 1 or 2, depending on the outcomes of the SA process.

Question 29 - Future options for the type and location of development

- 9.10 The options identified are what one would expect to see considered as potential sources of development, alongside any brownfield opportunities within existing urban areas. We are, therefore, supportive of all the identified locations above in principle.
- 9.11 On the basis that development at existing towns and villages will be constrained, we expect that a similar (if not higher) level of development will need to come forward in the West End to sustainably meet the housing requirement over the plan period.
- 9.12 Opportunities for infilling or extending existing settlements are relatively limited in the West End and so development here would need to be in the form of new towns or new villages. In this context new villages would be settlements of 'around 1,000' dwellings whilst new towns would be significantly larger than this at around 6,000 dwellings.
- 9.13 Both have the potential to achieve high levels of self-containment especially where this can be delivered in close proximity to existing services, facilities, public transport and employment opportunities.

- 9.14 The scale of new towns means that they can generally achieve a scale and critical mass sufficient to secure a more comprehensive range of services, facilities and employment opportunities, whilst also delivering substantial infrastructure improvements. New towns will generally achieve a greater level of self-containment than individual new villages which means that they will be less car dependent overall.
- 9.15 However, a carefully planned collection of new villages with excellent connectivity and range of complementary services between/within them can achieve similar levels of sustainability to new towns.
- 9.16 We would, therefore, strongly support the exploration of both of these options to accommodate development in the West End area.
- 9.17 Land controlled by LVA could deliver a new sustainable village with excellent access to existing employment and enhanced public transport connectivity along the A3052, alongside new services and facilities. Alternatively, the site could form part of a new town, which could be delivered alongside additional land to the north, east, west and south.

Question 30 - Establishment of a Development Corporation

- 9.18 The establishment of a Development Corporation needs to be carefully considered and informed by the specific context of any future growth areas. In our experience, Development Corporations are more effective at large-scale urban renewal/regeneration projects in areas where viability and/or deliverability is potentially problematic.
- 9.19 Whilst there are some complexities and funding considerations associated with the delivery of new settlements, these are generally in areas already identified as having limited constraints (greenfield sites) and where the private sector can be relied upon to deliver high-quality development in collaboration with the LPA, without the need for a Development Corporation to be established. As such, it is unlikely that we would support the establishment of a Development Corporation in this instance.

Question 31 – Planning for Development Beyond 2040

- 9.20 Paragraph 22 of the NPPF requires plans to cover a minimum 15-year period from the date of their adoption. The Local Plan is expected to be adopted in 2023, which means that the plan period should, as a minimum, cover until 2038. A plan period to 2040 would therefore align with national planning policy and also guards against any slippage in the Local Plan timetable. We would, therefore, not object to a plan period to 2040.
- 9.21 Whether the plan period should extend beyond 2040 will largely depend on the nature of the spatial distribution strategy that is ultimately identified. For example, if a large number of strategic sites are identified to deliver significant levels of growth which would not be completed by 2040, then it would make sense to extend the plan period appropriately beyond 2040 in order to avoid issues associated with pre-determining the location of future growth in subsequent rounds of plan review.
- 9.22 As we have alluded to elsewhere, an alternative reason for extending the plan period beyond 2040 may be to help facilitate the delivery of affordable housing. We note that the Local Plan is exploring uplifting its housing requirement to help meet identified affordable housing needs. Whilst extending the plan period by a few more years would increase the affordable housing need proportionately, it would reduce scale of the uplift required if this could be spread over a longer period of time. This may make an uplifted requirement more deliverable and so should be explored by the Local Plan accordingly.

10. SUSTAINABILITY APPRAISAL SCOPING REPORT

10.1 We are largely satisfied with the objectives that have been identified in the SA Scoping Report.

10.2 However, we do have concerns with the proposed metrics for assessing potential development sites. There are concerns that proposals for new towns and/or villages will perform poorly on the basis that these will be proposed in locations where there will be limited to no services and facilities available. However, a key benefit of new towns is that they are able to deliver a comprehensive range of jobs, infrastructure and services within convenient walking distance of their residents. This needs to be captured somehow in the SA or acknowledged as the conclusions of the SA are used to inform potential locations for future development.

11. LAND TO THE SOUTH OF CLYST HONITON, EXETER

11.1 LVA control an area of around 70ha to the east of Exeter, between the A30 and the A3052. Exeter Airport lies to the north, whilst the Hill Barton Business Park abuts the site along its southern boundary.

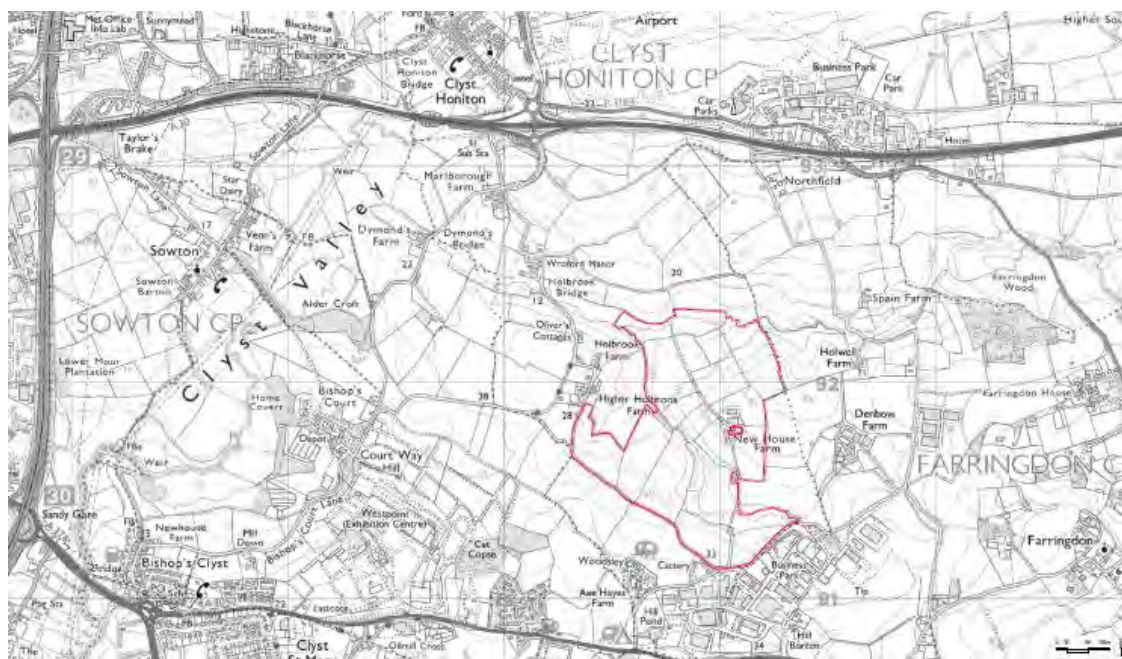


FIGURE 2: SITE LOCATION IN CONTEXT

11.2 LVA are promoting the site for a new community to the east of Exeter which builds on the success of the new communities of Cranbrook and Blackhorse in delivering strategic scales of development in this highly sustainable location.

11.3 Proposals are still at an early stage; however, LVA's site could be capable of accommodating around 1,500-2,000 dwellings² alongside strategic green infrastructure, public open space, primary/secondary schools (depending on need) local centre and strategic transport interventions. The ambition is to deliver a self-contained, mixed-use community with excellent pedestrian, cycling and public transport connectivity to key employment and service centres.

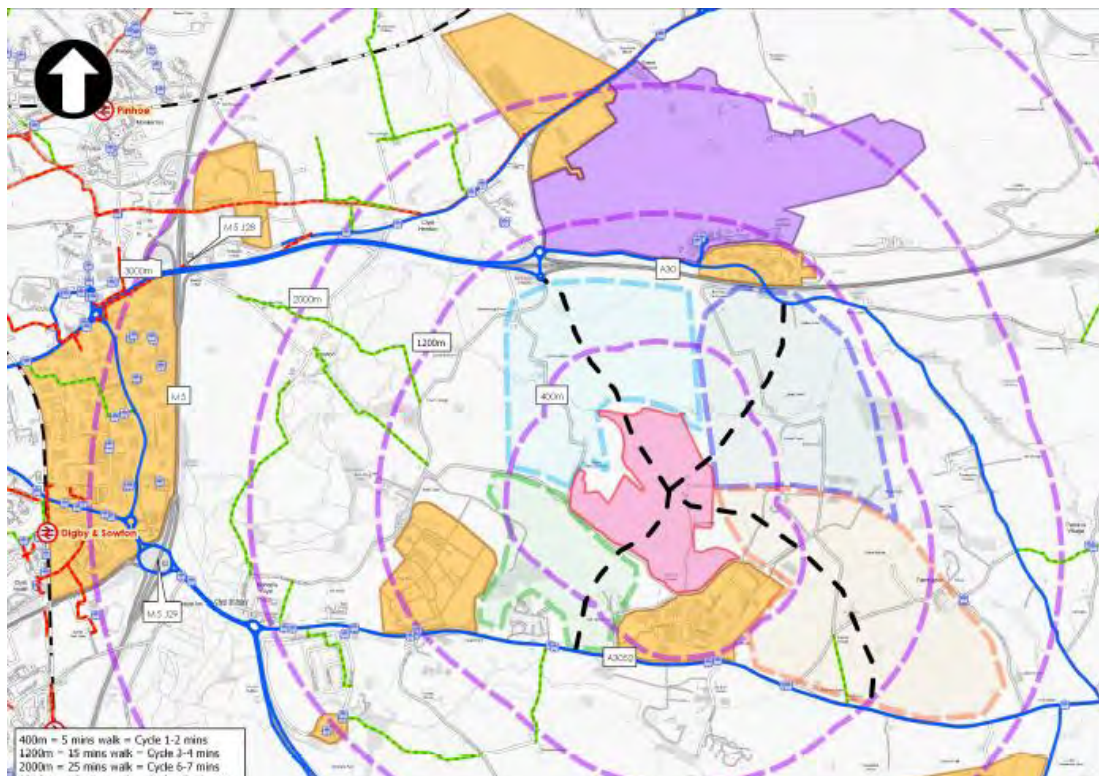
² Assuming 40dph on 50-60% developable area.

- 11.4 Given the importance of Exeter and the West End as a focus for employment and services, a significant proportion of development should be accommodated in this location in the interests of achieving sustainable patterns of development. As set out above, the scale of development will at least need to be in line with the level of growth identified in the adopted Local Plan, if not higher.
- 11.5 The site forms part of a wider area that was considered for development under the emerging Greater Exeter Strategic Plan (GESP) referred to as 'Hill Barton' (Site Reference SA-ED-3). This wider site covered an area of around 660ha and was considered capable of delivering 10,000 dwellings when opportunities and constraints had been considered.
- 11.6 We would note that none of the identified constraints would preclude development within this wider area and there are a number of benefits that would accrue from its development. The size of this wider area means that SANG could be delivered and areas of flood risk can easily be avoided.
- 11.7 Further technical work will be undertaken to understand the site's constraints and a vision for the site's development will emerge through collaboration with adjacent landowners. We will be happy to share any relevant technical information with the Council to assist with any individual site assessments that may be undertaken in due course.
- 11.8 The first stage in this process has been the commissioning of a Transport and Movement Assessment of the site to identify any potential transport related constraints and opportunities which may affect the site's development. These have been appended to the representations for reference.

APPENDIX 2: HIGHWAYS REPRESENTATIONS

- 11.9 This report confirms that suitable interventions could be delivered to ensure development would be well served by public transport. This would be achieved through the enhancement and provision of high frequency bus services to, from and through the site.
- 11.10 There would also be scope to deliver a north/south connection between the A30 and the A3052. This would not only provide enhanced connectivity to key locations within the West End (Exeter Airport, Science Park etc), but could also alleviate capacity issues at Junctions 29 and 30 of the M5. The provision of a new north-

south link would also be advantageous for public transport accessibility and viability. A site accessibility plan has also been prepared to show potential routes for this north/south connection and how they would relate to LVA's land.



APPENDIX 3/FIGURE 2: SITE ACCESSIBILITY PLAN

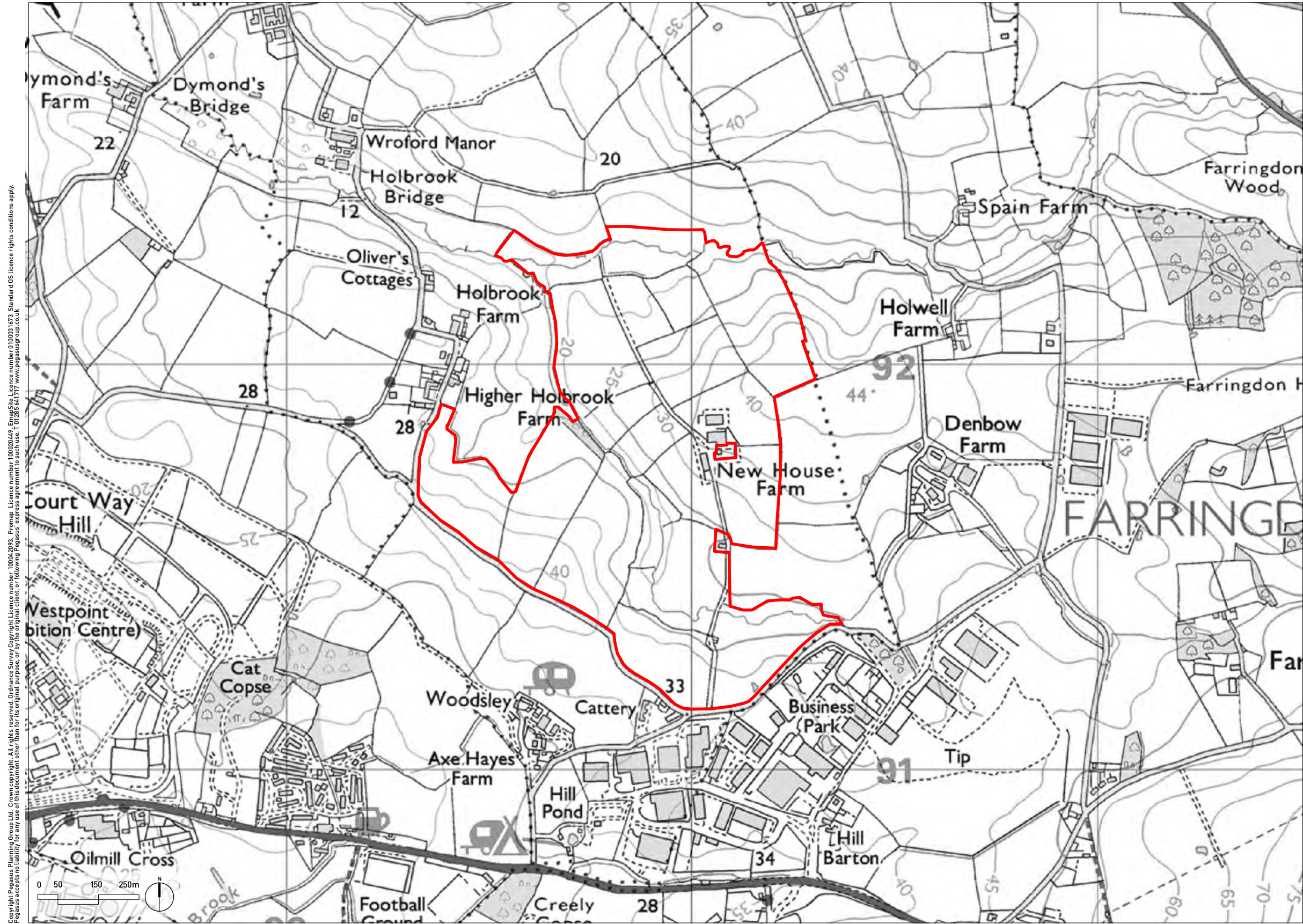
11.11 In simple terms, development in this area has the potential to deliver enhanced pedestrian, cycle, public transport and vehicular connectivity between key employment and services centres within the West End which could deliver significant positive transport benefits, reduce emissions and the overall carbon footprint associated with existing travel patterns.

11.12 As is shown on the Site Accessibility Plan, this wider area is controlled by a number of other developers/landowners. LVA intend to engage with these other interested parties to and adopt a collaborative approach in progressing a vision and proposal for the wider area.

11.13 We look forward to engaging with the Council to progress this vision and as we promote the site through the emerging Local Plan.

APPENDIX 1

SITE LOCATION PLAN



KEY: SITE LOCATION PLAN

SITE BOUNDARY (69.6HA)

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LAND AT CLYST HONITON, EXTER - SITE LOCATION PLAN

APPENDIX 2

TRANSPORT REPRESENTATIONS



Land at Clyst – East of Exeter

Local Plan Representations – Transport & Movement

Project No.	1175
Revision	Draft Issue
Date	11 March 2021
Client	LVA
Prepared	A Wozniczko
Checked	A Wozniczko
Authorised	I Awcock
File Ref.	P:\1185 Clyst, East of Exeter\C Documents\Reports\1185 - Land at Clyst - Local Plan Reps - Highways Matters.docx

1 Introduction

- 1.1 Awcock Ward Partnership (AWP) has been commissioned by LVA to undertake an initial review of the proposed development site at Clyst, East of Exeter. This focusses on Transport and Movement. The site is being promoted for new residential development of around 1,500 to 2,000 dwellings, on greenfield land between the A30(T) and A3052.
- 1.2 This note has been prepared to support the proposed allocation of the site within the emerging East Devon Local Plan. It identifies existing highways opportunities and constraints, and proposes preliminary strategies for access to facilitate development at the site.
- 1.3 The location of the site with respect to existing development and transport infrastructure is shown in Figure 1.1 appended to this report.

- 1.4 The existing site comprises undeveloped greenfield land, with frontage onto the public highway network along the south western and south eastern boundaries. These highway links comprise single track rural lanes, connecting the A3052 to the south and Bishop's Court Lane to the north. In turn Bishops Court Lane provides a connection with the A30(T) at the Exeter Airport junction.
- 1.5 The site formed part of a wider site that was considered as part of the Greater Exeter Strategic Plan (GESP) process. However, East Devon District Council has since resolved to withdraw from the GESP and prepare its own Local Plan.

2 Site Accessibility

- 2.1 The site is located between the A3052 and the A30(T), which are the two main arterial highway routes into East Devon from Exeter and the M5 to the west. The A3052 connects Exeter with Sidmouth and Seaton, as well as providing a link to the A376 at Clyst St George which provides access to Exmouth.
- 2.2 The A30(T) forms part of the national Strategic Road Network (SRN). Within Devon it provides the main link between Exeter and Honiton. Beyond the A30(T) continues as the A303(T) to the north-east providing access to destinations including Yeovil, Basingstoke and London. To the east of Honiton the SRN follows the A35(T) to destinations including Axminster, Bridport, Dorchester and further east along the south coast to Bournemouth, Poole and Southampton.
- 2.3 To the west the A30(T) and A3052 provide connections to the M5 at Junctions 29 and 30 respectively. The M5 is the other strategic highway link serving the south west peninsula, providing connectivity from Taunton, Bristol, The Midlands and The North. To the south of Exeter, the Strategic Road Network continues via the A30(T) which provides access to Cornwall and the A38(T) which provides access to south Devon and Plymouth.
- 2.4 The proposed development site is therefore situated at a key node on the national and regionally significant road network where there would be easy access to several strategic highway routes.
- 2.5 The location of the site with respect to existing development and transport infrastructure in the immediate locality is shown in Figure 1.1 appended to this report.
- 2.6 As shown on Figure 1.1, the site is located immediately north of Hill Barton Business Park to which access is taken from the A3052 to the south. The site is also in close proximity to Exeter Airport and the adjacent employment sites at Exeter Airport Business Park and Skypark located to the north of the A30(T) around 1km-2km

from the site respectively. Exeter Science Park is located around 2.5km to the north west close to Junction 29 of the M5.

- 2.7 To the west, regionally significant employment areas are also located at the fringes of Exeter City immediately to the west of the M5, including Exeter Business Park and Sowton Industrial Estate all within approximately 2.5km to 3km of the proposed development site. Pynes Hill Business Park lies just beyond to the west within around 4km. To the east, Greendale Business Park is located approximately 2km from the site south of the A3052.
- 2.8 The proposed development site is therefore located very close to significant existing employment development where there would be opportunities for residents to access work within a short travel distance. This would therefore increase the attractiveness of sustainable modes of travel for journeys to work or, where car journeys remain part of the journey choice, reduce the emissions and carbon footprint of trips to employment destinations.
- 2.9 Given the close proximity of employment, the site is considered to provide a fundamentally sustainable location to which residential-led development can be directed when compared with other locations in the East Devon District that lie further away from major employment areas and strategic highway infrastructure.
- 2.10 Being surrounded by undeveloped land, the site is otherwise unconnected to existing residential areas where other facilities and services, such as shops and schools, are located. The site lies approximately 2km east of Clyst St Mary where access to the nearest school and shop are available. However, the site is of a scale that would provide the critical mass to support the delivery of other local retail, education, health and recreational facilities for residents alongside housing to provide a genuinely mixed-use scheme, an approach that is supported in the Council's Issues and Options report.
- 2.11 The masterplan would be developed to provide "walkable neighbourhoods" as defined by Manual for Streets guidance. This would ensure that residents could easily access local services to meet their everyday needs for shops and schools within around 800m by walking and cycling, greatly increasing internalisation of local trips and reducing the generation of residual trips on the wider network. The masterplan would also be underpinned by a well-designed movement network which defines a clear pattern of streets that adopt the principles promoted within the National Design Guide.

Public Transport

Bus

The site is close to important bus service corridors to both the north and south. The nearest bus stop is located on the A3052 near Hill Barton Business Park around 500m from the site. This would equate to around 5-10 minutes' walk. The stops are served by route 9/9A which provides a combined half-hourly frequency between Exeter City Centre and Sidmouth, and hourly services to Honiton, Seaton and Lyme Regis. Along its route into Exeter, route 9/9A provides easy access to Sowton Industrial Estate and the Royal Devon & Exeter Hospital.

- 2.12 To the north route 4/4A provides a 20 minute frequency between Cranbrook and Exeter City Centre, with services continuing to Honiton on a half-hourly basis and Axminster hourly.
- 2.13 Route 56 connects Exeter St David's Railway Station with Exmouth via Exeter Bus Station, Exeter Business Park, Exeter Science Park, Exeter Airport and Greendale Business Park. The route follows the B3184 to the north and east of the site. This service currently runs every 30 minutes between Exeter City Centre and the airport, with an hourly service continuing beyond to Exmouth.

Rail

- 2.14 The nearest railway stations to the site are Digby and Sowton to the west and Cranbrook to the north, both around 3km distant. Digby and Sowton lies on the Avocet line, with direct services to Exmouth, Exeter Central and Exeter St David's as well destinations further afield including Torquay, Paignton and Barnstaple. Cranbrook is situated on the Exeter to London Waterloo line, with direct services to Honiton and Axminster amongst others. Both lines provide direct access to Exeter St David's which is a regionally significant rail interchange where services are available across the UK to destinations including Plymouth, Cornwall, Taunton, Bristol, The Midlands, The North, Scotland and London.
- 2.15 Both Digby and Sowton and Cranbrook stations form part of the emerging Devon Metro scheme, promoted by Devon County Council to aid the integration and enhancement of rail services in the Exeter travel to work area. This includes the construction of a new passing loop to improve reliability and frequency on the route between Exeter and Honiton via Cranbrook.
- 2.16 The proposed development site would therefore be within easy reach of local rail stations which would provide further opportunities for travel to destinations further afield using a sustainable mode of transport.

2.17 In summary, the site is considered to be in a fundamentally accessible location with respect to significant employment areas, important road, bus and rail transport infrastructure. Development in this location would therefore provide a sound basis for which to locate new residential-led development in transport terms, with appropriate strategies to provide other local services within new development itself, as well as safe and convenient connections to existing transport infrastructure and services. Development of the site for residential-led mixed-use development is therefore considered to be consistent with the transport sustainability objectives of the NPPF.

Access

2.18 The site has direct frontage to the rural public highway network to the south west and south eastern boundaries. Whilst these lanes may not currently be of a standard to support development of the scale that could be accommodated within the proposed site, the routes do provide an existing network that has the potential to be enhanced using very limited amounts of adjacent land. This is particularly the case to the south and west, where access to the A3052 is only 630m from the site following the existing road network. This would require works to upgrade the existing junction where the lane meets the A3052.

2.19 One option considered as part of the GESP comprised a much larger area of development on land between the A3052 and the A30(T) of which the proposed development site formed a central part. As well as providing additional critical mass to support the delivery of a greater number and scale of local facilities and services within the development itself, this approach also provides opportunities to provide additional transport connectivity with key highway routes to both the north and the south as illustrated on Figure 1.1. This could include routes between the A3052 west of Hill Barton Business Park and the B3184 at Exeter Airport Business Park and/or a route between the A3052 east of Hill Barton Business Park and the A30(T) at the Exeter Airport junction. The latter option would also provide onward connectivity north to Skypark, Exeter Science Park and Cranbrook.

2.20 Appropriate pedestrian and cycle connections, potentially utilising the existing lanes, could be provided in association with new road infrastructure, tying into existing facilities at either end. This would connect with the strategic cycle route between Cranbrook and Exeter at Clyst Honiton to the north. Such infrastructure would facilitate and encourage journeys to be made using both manual and e-bikes, and potentially electrically powered scooters depending on the legislative context in future years.

2.21 The section of the B3184 between Exeter Airport and the A3052 used by existing bus route 56 takes the form of a relatively narrow rural lane with very limited potential bus patronage. There is therefore an opportunity for service 56 to be

re-routed and enhanced between Greendale Business Park and Exeter Airport to follow new modern highway infrastructure serving new development between the A3052 and the A30(T) as described above. As well as providing new sustainable transport opportunities for residents to access destinations further afield, including central Exeter, the additional patronage generated by new development would help to underpin the financial sustainability of the bus service which also provides a vital service for more remote village communities further south along the route.

- 2.22 Appropriate development land allocations, would also provide the opportunity to introduce new dedicated services extending from travel corridors into Exeter via J29 or J30 of the M5. If a new link road is provided between the A3052 and the A30(T) then this would open up the potential for circular routes providing opportunities for travel into the city in either direction via Sowton and Exeter Business Park via Exeter Airport, Skypark and the Science Park, potentially also linking out to enhance public transport availability at Cranbrook.
- 2.23 To the north west the Exeter Airport junction provides a grade-separated dumbbell arrangement, which is understood to operate without any constraints to capacity. Other connections to the B3184 to the north east and/or the A3052 to the south would require new junctions which would be designed in accordance with relevant safety and capacity criteria.
- 2.24 There is therefore flexibility for how the proposed development site, either with or without wider new development in the area, can be accessed in a safe and suitable manner, with multiple opportunities to facilitate connectivity with surrounding highway infrastructure for all modes of travel.
- 2.25 Figure 1.1 shows options for how this could be achieved including other areas of land around the proposed site that were previously identified within the emerging GESP. The extent of land anticipated to be offered for allocation presents a substantial opportunity for significant beneficial highway infrastructure to be provided. Figure 1.1 illustrates a variety of options demonstrating how access could be delivered with wider areas of development in different combinations.

Traffic Movement

- 2.26 The Issues and Option documentation published by the Council highlights that traffic has increased slightly on the M5 and A30 since 2005, but remained relatively constant on the A3052.
- 2.27 Providing access to new development in the area from both the north and south would reduce the residual traffic impact at any one highway link or junction on the network. However, if new development were to facilitate a new highway

connection between the A3025 and the A30(T) this would also provide additional capacity and resilience for the highway to support the movement of existing traffic flows around the network.

- 2.28 Currently the majority of traffic through the area with an origin or destination in East Devon passes through two pinch-points on the road network at Junction 29 and 30 of the M5 which can become congested during peak periods. This arrangement is also likely to lead to an element of extremely short journeys on the M5 (i.e. junction hopping) between these two locations where existing congestion and limited merging lengths are an acknowledged issue.
- 2.29 A new north-south highway connection through the development site and surrounding land would therefore open the potential for the re-distribution of journeys away from these pressure points on the existing road network. This includes key north-south desire lines for journeys to work at destinations around the Airport, Exeter Business Park, Hill Barton Business Park and Greendale Business Park. However, it would also provide alternative routes to/from the M5 for journeys with origins and destinations throughout East Devon.
- 2.30 The provision of a new north-south link would also be advantageous for public transport accessibility and viability and, as set out above, the location of the site creates a range of opportunities to provide connectivity by sustainable transport modes. The take-up of these modes would be promoted through the implementation of a robust Travel Plan, alongside other measures such as lift sharing, demand responsive travel, provision of super-fast broadband to facilitate home-working/shopping and the use of technology to plan and execute journeys. In combination, an overarching sustainable access strategy for the site has the potential to significantly reduce the number of residual car journeys generated by new development and therefore the capacity and environmental impacts across the wider area.
- 2.31 In addition to the access strategy for the locality, the provision of a new north-south link in connection with the delivery of new development in the area therefore has the potential to provide significant positive traffic impacts that could offer benefits in terms of reduced delay, emissions, and carbon footprint associated with existing travel patterns as well as providing a new residential community in close proximity to employment encouraging sustainable active travel choices and reducing development traffic.

3 Summary & Conclusion

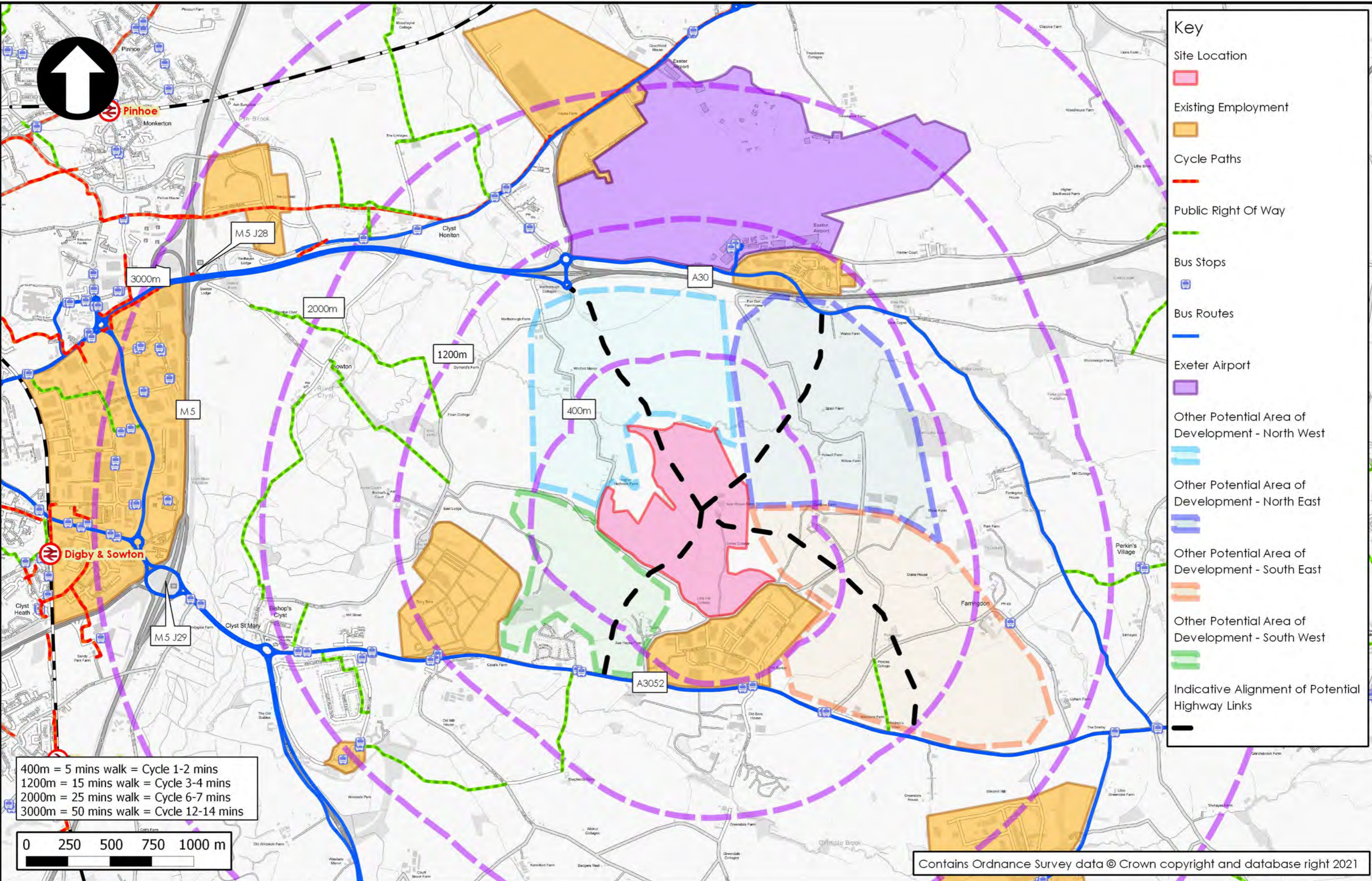
- 3.1 Awcock Ward Partnership (AWP) has been commissioned by LVA to undertake an initial review of the proposed development site at Clyst, East of Exeter focusing on Transport and Movement. The site is being promoted for new

residential development of around 1,500 to 2,000 dwellings, on greenfield land between the A30(T) and A3052.

- 3.2 The site is considered to be in a fundamentally accessible location with respect to significant employment areas, important road, bus and rail transport infrastructure. Development in this location would therefore provide a sound basis for which to locate new residential-led development in transport terms, with appropriate strategies to provide other local services within new development itself, as well as safe and convenient connections to existing transport infrastructure and services. Development of the site for residential-led mixed-use development is therefore considered to be consistent with the transport sustainability objectives of the NPPF.
- 3.3 There is flexibility for how the proposed development site, either with or without wider new development in the area, can be accessed in a safe and suitable manner, with multiple opportunities to facilitate connectivity with surrounding highway infrastructure for all modes of travel. This includes positive cycle connectivity and opportunities for enhancements to bus services that could also provide wider community benefit.
- 3.4 The provision of a new north-south link between the A30(T) and the A3052 in connection with the delivery of new development in the area has the potential to provide significant positive traffic impacts that could offer benefits in terms of reduced delay, emissions, and carbon footprint associated with existing travel patterns.
- 3.5 In conclusion, the proposed development site is considered to provide an intrinsically accessible location for new development that can be further supported by the provision of new local neighbourhood services within a holistic masterplan alongside sustainable transport links to the surrounding area. In addition, there are opportunities to deliver a safe and suitable access that also open the potential for enhancements of the highway network that could deliver broader benefits to the wider community in terms of reduced delay, emissions and carbon footprint.
- 3.6 It is therefore considered that there is a very strong opportunity to create a sustainable new community in close proximity to existing employment areas and strategic transport infrastructure, and that allocation of the proposed site within the new East Devon Local Plan is entirely consistent with the NPPF in highways terms.

AWP

Appendix A Site Accessibility Plan



Cyst, East Of Exeter
 Site Accessibility Plan

Job number:	1185
Drawn:	RF
Checked:	SD
Approved:	AJW

Figure 1.1



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Land at Clyst – East of Exeter

Local Plan Representations – Transport & Movement

Project No.	1175
Revision	Draft Issue
Date	11 March 2021
Client	LVA
Prepared	A Wozniczko
Checked	A Wozniczko
Authorised	I Awcock
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Public Transport

Bus

The site is close to important bus service corridors to both the north and south. The nearest bus stop is located on the A3052 near Hill Barton Business Park around 500m from the site. This would equate to around 5-10 minutes' walk. The stops are served by route 9/9A which provides a combined half-hourly frequency between Exeter City Centre and Sidmouth, and hourly services to Honiton, Seaton and Lyme Regis. Along its route into Exeter, route 9/9A provides easy access to Sowton Industrial Estate and the Royal Devon & Exeter Hospital.

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Rail

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2.21 The section of the B3184 between Exeter Airport and the A3052 used by existing bus route 56 takes the form of a relatively narrow rural lane with very limited potential bus patronage. There is therefore an opportunity for service 56 to be

re-routed and enhanced between Greendale Business Park and Exeter Airport to follow new modern highway infrastructure serving new development between the A3052 and the A30(T) as described above. As well as providing new sustainable transport opportunities for residents to access destinations further afield, including central Exeter, the additional patronage generated by new development would help to underpin the financial sustainability of the bus service which also provides a vital service for more remote village communities further south along the route.

- 2.22 Appropriate development land allocations, would also provide the opportunity to introduce new dedicated services extending from travel corridors into Exeter via J29 or J30 of the M5. If a new link road is provided between the A3052 and the A30(T) then this would open up the potential for circular routes providing opportunities for travel into the city in either direction via Sowton and Exeter Business Park via Exeter Airport, Skypark and the Science Park, potentially also linking out to enhance public transport availability at Cranbrook.
- 2.23 To the north west the Exeter Airport junction provides a grade-separated dumbbell arrangement, which is understood to operate without any constraints to capacity. Other connections to the B3184 to the north east and/or the A3052 to the south would require new junctions which would be designed in accordance with relevant safety and capacity criteria.
- 2.24 There is therefore flexibility for how the proposed development site, either with or without wider new development in the area, can be accessed in a safe and suitable manner, with multiple opportunities to facilitate connectivity with surrounding highway infrastructure for all modes of travel.
- 2.25 Figure 1.1 shows options for how this could be achieved including other areas of land around the proposed site that were previously identified within the emerging GESP. The extent of land anticipated to be offered for allocation presents a substantial opportunity for significant beneficial highway infrastructure to be provided. Figure 1.1 illustrates a variety of options demonstrating how access could be delivered with wider areas of development in different combinations.

Traffic Movement

- 2.26 The Issues and Option documentation published by the Council highlights that traffic has increased slightly on the M5 and A30 since 2005, but remained relatively constant on the A3052.
- 2.27 Providing access to new development in the area from both the north and south would reduce the residual traffic impact at any one highway link or junction on the network. However, if new development were to facilitate a new highway

connection between the A3025 and the A30(T) this would also provide additional capacity and resilience for the highway to support the movement of existing traffic flows around the network.

- 2.28 Currently the majority of traffic through the area with an origin or destination in East Devon passes through two pinch-points on the road network at Junction 29 and 30 of the M5 which can become congested during peak periods. This arrangement is also likely to lead to an element of extremely short journeys on the M5 (i.e. junction hopping) between these two locations where existing congestion and limited merging lengths are an acknowledged issue.
- 2.29 A new north-south highway connection through the development site and surrounding land would therefore open the potential for the re-distribution of journeys away from these pressure points on the existing road network. This includes key north-south desire lines for journeys to work at destinations around the Airport, Exeter Business Park, Hill Barton Business Park and Greendale Business Park. However, it would also provide alternative routes to/from the M5 for journeys with origins and destinations throughout East Devon.
- 2.30 The provision of a new north-south link would also be advantageous for public transport accessibility and viability and, as set out above, the location of the site creates a range of opportunities to provide connectivity by sustainable transport modes. The take-up of these modes would be promoted through the implementation of a robust Travel Plan, alongside other measures such as lift sharing, demand responsive travel, provision of super-fast broadband to facilitate home-working/shopping and the use of technology to plan and execute journeys. In combination, an overarching sustainable access strategy for the site has the potential to significantly reduce the number of residual car journeys generated by new development and therefore the capacity and environmental impacts across the wider area.
- 2.31 In addition to the access strategy for the locality, the provision of a new north-south link in connection with the delivery of new development in the area therefore has the potential to provide significant positive traffic impacts that could offer benefits in terms of reduced delay, emissions, and carbon footprint associated with existing travel patterns as well as providing a new residential community in close proximity to employment encouraging sustainable active travel choices and reducing development traffic.

3 Summary & Conclusion

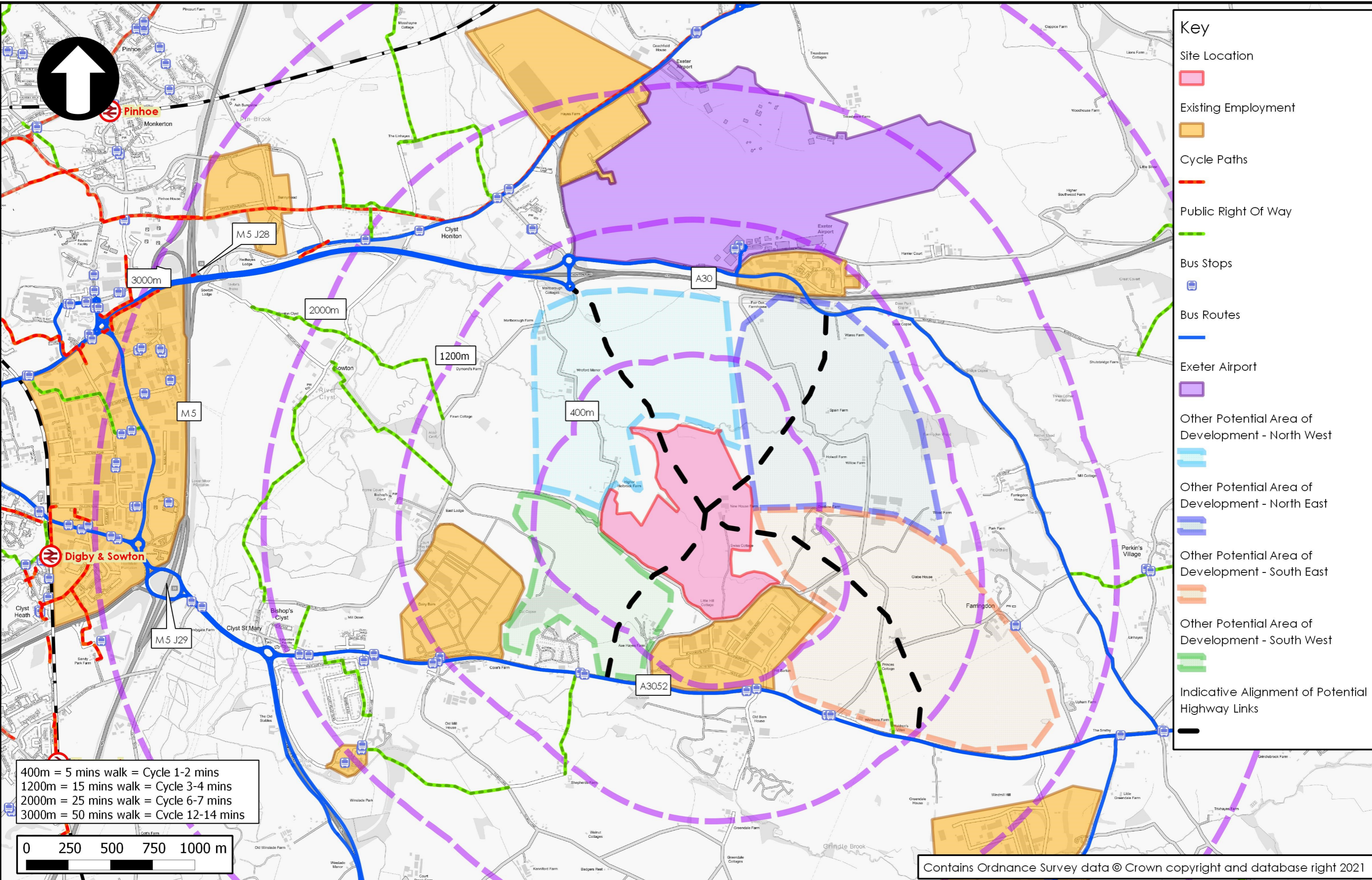
- 3.1 Awcock Ward Partnership (AWP) has been commissioned by LVA to undertake an initial review of the proposed development site at Clyst, East of Exeter focusing on Transport and Movement. The site is being promoted for new

residential development of around 1,500 to 2,000 dwellings, on greenfield land between the A30(T) and A3052.

- 3.2 The site is considered to be in a fundamentally accessible location with respect to significant employment areas, important road, bus and rail transport infrastructure. Development in this location would therefore provide a sound basis for which to locate new residential-led development in transport terms, with appropriate strategies to provide other local services within new development itself, as well as safe and convenient connections to existing transport infrastructure and services. Development of the site for residential-led mixed-use development is therefore considered to be consistent with the transport sustainability objectives of the NPPF.
- 3.3 There is flexibility for how the proposed development site, either with or without wider new development in the area, can be accessed in a safe and suitable manner, with multiple opportunities to facilitate connectivity with surrounding highway infrastructure for all modes of travel. This includes positive cycle connectivity and opportunities for enhancements to bus services that could also provide wider community benefit.
- 3.4 The provision of a new north-south link between the A30(T) and the A3052 in connection with the delivery of new development in the area has the potential to provide significant positive traffic impacts that could offer benefits in terms of reduced delay, emissions, and carbon footprint associated with existing travel patterns.
- 3.5 In conclusion, the proposed development site is considered to provide an intrinsically accessible location for new development that can be further supported by the provision of new local neighbourhood services within a holistic masterplan alongside sustainable transport links to the surrounding area. In addition, there are opportunities to deliver a safe and suitable access that also open the potential for enhancements of the highway network that could deliver broader benefits to the wider community in terms of reduced delay, emissions and carbon footprint.
- 3.6 It is therefore considered that there is a very strong opportunity to create a sustainable new community in close proximity to existing employment areas and strategic transport infrastructure, and that allocation of the proposed site within the new East Devon Local Plan is entirely consistent with the NPPF in highways terms.

AWP

Appendix A Site Accessibility Plan



Cyst, East Of Exeter Site Accessibility Plan

Job number:	1185
Drawn:	RF
Checked:	SD
Approved:	AJW

Figure 1.1

