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Our Ref: BL

28 March 2025

East Devon District Council

By Email Only



Dear Sir / Madam,

East Devon Local Plan Regulation 19 Consultation – Policy SP01: Spatial strategy and Policy SP02: Levels of future housing development

For: Mosaic (Exeter) Ltd

We write on behalf of the Mosaic (Exeter) Ltd in relation to the East Devon Local Plan Regulation 19 consultation, specifically regarding policy SP01 and SP02.

Our submission provides comments on the local plan spatial strategy and key specific policies. This representation is consistent with the previous submissions made to the Council, and should be considered alongside these.

In summary we consider though that:

- The Council should consider planning for additional housing to exceed the 80% of the new standard methodology and that options for growth close to Exeter but not to the east of the City should be explored to balance pressure on infrastructure
- Our client can deliver a site at the western end of the district **but that would not put additional pressure on** infrastructure east of Exeter and the same time would be aligned with growth aspirations for Exeter and would be well connected to existing and proposed sustainable modes of transport
- As part of housing and other uses being delivered a development could secure a junction improvement in a location that is well recognised as being in need to enhancement and at the same ensuring the future delivery of the Boniface Trail is fostered and safeguarded

The Spatial Strategy

Strategic Policy SP01: Spatial Strategy sets out that *“New development will be directed towards the most sustainable locations in East Devon, by: ... “A. Focusing new development at the West End of the district, including a further new community, on-going development of Cranbrook and other major*

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strategic developments close to Exeter. The West End is not a spatially defined policy area with a line on the Policies map, rather it is a term that applies to development proposals and site allocations referred to in this Chapter of the plan"

This overarching strategy for the area is welcomed in principle, however it is considered the Council approach has fundamentally overlooked opportunities at the 'west end' but which lie on the north/north west of Exeter in favour of focusing development solely to the east of Exeter. Our client considers this to be a missed opportunity to deliver balanced growth. Taking a 'narrow' approach such as this has the potential to place undue development pressure on infrastructure to the east of Exeter, as well as resulting in the loss of large tracts of BMV.

Furthermore, the reliance on a large new settlement to deliver a key proportion of the housing required has clear delivery challenges and if unforeseen issues are later identified there is a significant risk the Council will find themselves in very weak position with regard to delivery and growth needs may remain unmet for some time.

Our client considers that a more balanced approach, to include a proportion of growth on the north/north western side of Exeter would reduce delivery risks and pressure on infrastructure at the western end of the District, whilst still according with the overarching spatial strategy and being a logical, sustainable location for growth that would not only help meet the development needs of East Devon but Exeter as well.

The levels of future housing development are outlined in Strategic Policy SP02. This states that *"Housing provision will be made for at least 20,909 dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042. The housing requirement will be delivered through a stepped trajectory, with an annual target of 850 homes from 2020/21 to 2031/32, increasing to 1,070 homes per year from 2032/33 to 2041/42."*

While this level of housing is generally supported, it only represents 80% of the housing requirement calculated using the new standard methodology introduced in December 2024 with the updated National Planning Policy Framework (NPPF). Although this approach is acceptable under the transitional arrangements set out in the NPPF (Annex 1 - Paragraph 234) it is questioned whether East Devon District Council should instead be looking to exceed this and plan for the full housing requirement given the recognised housing crisis. This would equate to 26,136 dwellings over the plan period.

Additionally, given that this is a minimum housing requirement, it is crucial that there are sufficient allocations made to achieve and exceed the target. At present, the amount of allocations put forward as whole could provide greater flexibility and resilience to the supply of land to ensure that levels of housing above the minimum target can be achieved. Given the pressing need to boost the supply of housing land, additional allocations (including land associated with the former showground site) could be included to achieve this.

Notwithstanding the above, we also have concerns that EDDC might not be considered to benefit from

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the transitional arrangements given that this is only a partial Regulation 19 Consultation. We presume legal advice has been taken on this point.

In conclusion, we welcome the Council's approach to boosting housing supply, but consider that it could go further in meeting future housing need in East Devon and the wider area.

We consider that the Land at Cowley Barton Farm provides an excellent opportunity to deliver a housing/mixed use development at the west end of the district, close to Exeter and aligned with strategic public transport links along the A377. Bringing this site forward would place no increased pressure on infrastructure east of Exeter and would offer the unique opportunity to provide a housing led development in a sustainable location whilst helping to resolve the existing highway constraints at Cowley where the St Andrews Road joins the A377.

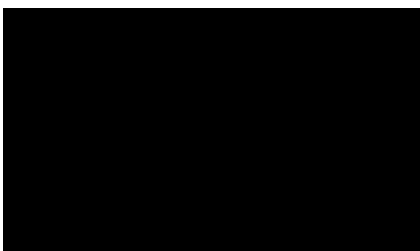
Such proposals would also link well with the proposed Boniface Trail walking and cycle route between Exeter and Crediton. Mosaic are supportive of this route and have made representations to the Devon County Council consultation on this and consider that the land at Cowley Barton Farm could play an instrumental part in either option consulted on, especially with regard to the transition from the proposed route to the existing highway/PROW network.

Allocating the land at Cowley Barton Farm to help meet required housing numbers and delivering the highway improvements outlined whilst securing the strategic future of the Boniface Trail (should it be brought forward) would be consistent with the 'vision led' approach set out in the December 2024 NPPF which sets out that *'Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places.'*

Accompanying this letter is an illustrative concept plan which shows how development at Cowley Barton Farm could bring forward development and the wider public benefits outlined. It is considered that the option shown, or a smaller scale iteration focused on the northern land area, could deliver similar benefits and the development requirement would dictate what quantum is brought forward.

Should you wish to discuss this further, or have any questions or queries, please do not hesitate to contact us.

Yours faithfully,



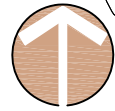
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Professional Partner – Head of Planning Services
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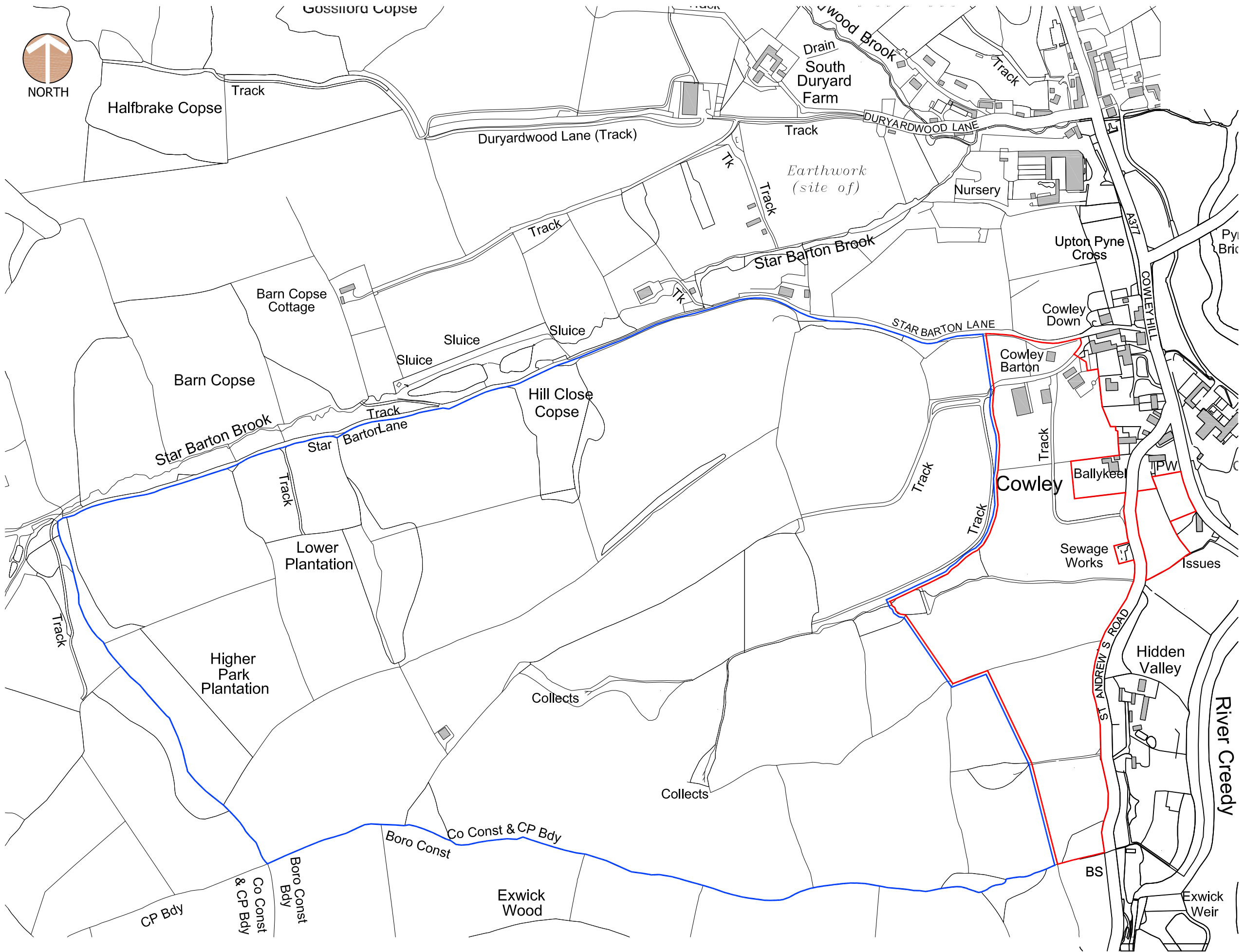
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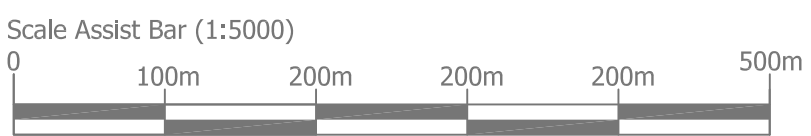
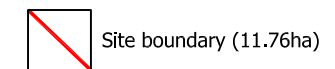
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Legend



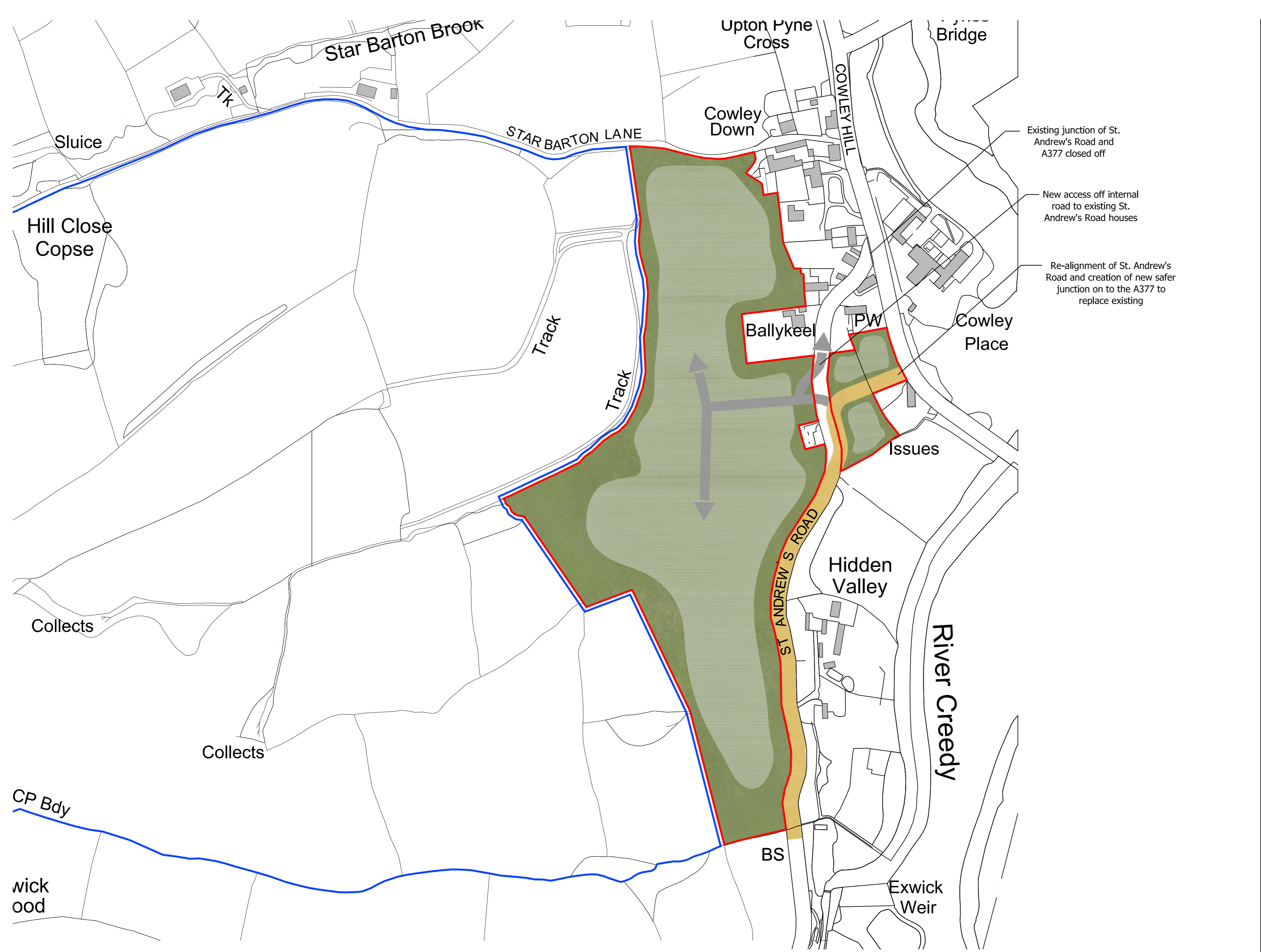
CLIENT:
Mosaic (Exeter) Limited

PROJECT:
Land at Cowley Barton Farm, Cowley, Exeter

DRAWING TITLE:
Site Location Plan - Option 1

SCALE: 1:5000@A3 DATE: 24/03/2025 DRAWN: JNM

DRAWING NUMBER: 13137/900 REVISION:



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Legend

-  Site boundary
-  Indicative development parcel
-  POS
-  Indicative route of St. Andrew's Road
-  Indicative new access road

Existing junction of St. Andrew's Road and A377 closed off

New access off internal road to existing St. Andrew's Road houses

Re-alignment of St. Andrew's Road and creation of new safer junction on to the A377 to replace existing



CLIENT:
 Mosaic (Exeter) Ltd.

PROJECT:
 Land at Cowley Barton Farm, Cowley, Exeter

DRAWING TITLE:
 Illustrative Development Plan - Option 1

SCALE: 1:2500@A2
 DATE: 24/03/2025
 DRAWN: JNM
 DRAWING NUMBER: 13137/901
 REVISION:

