



Broadclyst Parish Council
GROWING OUR COMMUNITY

East Devon District Council
Blackdown House
Heathpark Industrial Estate
Honiton
EX14 1EJ

Broadclyst Parish Council
19 New Buildings
Broadclyst
Exeter
EX5 3EX
28/02/2025

Your ref:
Our ref: 25/010

Subject: Objection to the Allocation of Additional Housing at Winter Gardens (Brcly_12)

Dear Chairman and Members of the Strategic Planning Committee,

Broadclyst Parish Council wishes to express deep concerns regarding the recent decision to allocate an additional 100 dwellings at the Winter Gardens site (Brcly_12). This decision significantly diverges from the principles of sustainable development and disregards the cumulative impact of recent housing allocations within Broadclyst Parish.

Broadclyst Parish has already absorbed significant housing growth through large developments at Tithebarn and West Clyst, placing mounting pressure on local infrastructure, amenities, and services. The proposed increase in housing allocation at Winter Gardens exacerbates these challenges and raises serious questions about the strategic soundness of this decision.

The Parish Council recognizes the importance of meeting local and national housing objectives and is not opposed to development within the Parish. On the contrary, the Council supports growth that is proportionate, sustainable, and aligned with the unique character and infrastructure capacity of Broadclyst. However, for development to succeed, it must be carried out responsibly, with due consideration given to the well-being of residents, the environment, and the Parish's long-term sustainability.

Broadclyst Parish Council is committed to working constructively with East Devon District Council (EDDC) to achieve these aims. By engaging meaningfully with the community and ensuring that infrastructure and services are adequate to support new growth, EDDC can deliver housing that benefits both current and future generations while preserving Broadclyst's rural identity. In this letter, the Parish Council urges EDDC to revisit the proposed allocation and to collaborate with us to ensure that any development at Winter Gardens reflects these shared principles.

Key Points of Concern

1. Inadequate Infrastructure Capacity

The proposed increase in housing allocation at Wintergardens (Brclly_12) fails to account for the limitations of Broadclyst's existing infrastructure. The Parish is already under significant strain from recent and ongoing developments at Tithebarn and West Clyst. Roads, schools, healthcare facilities, and other essential amenities are stretched beyond capacity, and the addition of 100 dwellings will exacerbate these pressures, undermining the principles of sustainable development.

The Officer's original recommendation for the Winter Gardens site was to cap housing at 70 dwellings, stating that "any larger development would be on too great a scale for a settlement the size of Broadclyst." This professional judgment reflected a clear understanding of the Parish's infrastructure constraints and the importance of proportional growth. Increasing the allocation to 100 dwellings disregards this well-founded assessment and threatens the community's ability to accommodate further development without significant detriment to residents' quality of life.

1.1. Policy and Research Support

National and local planning frameworks emphasize the critical role of infrastructure in ensuring sustainable development:

- 1.1.1. **NPPF Paragraph 8:** Highlights that sustainable development must meet social objectives by fostering well-designed, safe, and accessible infrastructure.
- 1.1.2. **NPPF Paragraph 20:** Requires strategic policies to ensure that developments are supported by sufficient provision of infrastructure, including transport, healthcare, and education.
- 1.1.3. **East Devon Local Plan Strategy 36:** Stipulates that development in villages like Broadclyst must be proportionate to the capacity of existing infrastructure to avoid adverse impacts on local services and residents.

Ignoring these principles risks creating a development that fails to support the social and environmental well-being of the community. Research by the **Royal Town Planning Institute (RTPI)** in *Planning for Infrastructure* (2021) demonstrates that overloading local infrastructure often leads to diminished community satisfaction and resistance to future growth. **Barton et al. (2010)** further emphasize in *Shaping Neighbourhoods* that infrastructure deficits undermine public health and well-being.

1.2. Building on Community Assets

The principles of **Asset-Based Community Development (ABCD)**, as developed by **McKnight and Kretzmann (1993)**, stress the importance of building on existing community strengths and capacities. Broadclyst relies heavily on its existing infrastructure assets, such as schools, healthcare services, and community spaces, to support residents. However, these assets are already at capacity, and further development without parallel investment risks eroding these vital community foundations.

1.3. Recommendations

To ensure that growth at Wintergardens is sustainable and community-focused, East Devon District Council must:

- 1.3.1. Reinstate the original recommendation of 70 dwellings, respecting the Parish's capacity limitations as outlined in the Officer's report.
- 1.3.2. Conduct a comprehensive infrastructure impact assessment before considering any increase in housing allocation.
- 1.3.3. Adopt measures aligned with **ABCD principles** to strengthen and expand community assets, empowering residents to adapt to sustainable growth.
- 1.3.4. Secure legally binding agreements for infrastructure enhancements, such as school expansions, road improvements, and increased healthcare provision, ensuring that the needs of both current and future residents are met.

Without these actions, the proposed increase risks overwhelming local infrastructure and jeopardizing Broadclyst's long-term sustainability, contradicting the fundamental principles of proportionate and sustainable development.

2. Disregard for Community Engagement

The decision-making process has neglected meaningful engagement with the community and the Parish Council, leaving residents feeling excluded from decisions directly impacting their quality of life. Furthermore, the proposed allocation of 100 dwellings at Wintergardens conflicts with the Broadclyst Neighbourhood Plan (BNP), which emphasises balanced and proportionate growth.

- 2.1. **Policy H1**: Requires housing growth to align with the village's scale and infrastructure capacity. Increasing the allocation beyond 70 dwellings undermines this principle.
- 2.2. **Policy C1**: Highlights the need to safeguard community facilities, such as schools and healthcare, which are already under strain.
- 2.3. **Policy T1**: Stresses the importance of enhancing transport and pedestrian connectivity, which this proposal fails to address adequately.

- 2.4. **Policy E2:** Seeks to protect Broadclyst's unique landscape and ecological character, which is jeopardised by the increased density.

By disregarding both the BNP and broader community feedback, the proposal undermines public trust in the planning process and fails to respect the established vision for Broadclyst's future.

3. Erosion of Public Trust

The decision to increase the housing allocation at Winter Gardens has eroded public confidence in the fairness and transparency of the planning process. Trust is a cornerstone of effective governance, particularly in local planning, where decisions directly impact communities.

Research by the **Local Government Association (LGA)** emphasises that public trust in planning is built on transparency, fairness, and meaningful engagement. When communities feel excluded or believe their concerns are dismissed, trust deteriorates, leading to long-term disengagement and resistance to future developments (LGA, 2017).

In the case of Broadclyst, the deviation from the Officer's original recommendation of 70 dwellings—without clear justification or sufficient consultation—has fostered a perception of an opaque process that prioritizes housing targets over community needs. The Broadclyst Neighbourhood Plan, a locally developed document endorsed through extensive public consultation, has been undermined, further eroding confidence in the integrity of the planning framework.

Academic research on planning governance, such as the work of **Healey (1997)** and **Parker et al. (2015)**, highlights that disregarding community-led plans can create a "participation gap," where communities perceive planning as a top-down exercise rather than a collaborative process. This not only undermines trust but also risks non-cooperation from residents, potentially stalling future strategic initiatives.

To restore public trust, East Devon District Council must demonstrate accountability by:

- 3.1. Providing a clear, evidence-based rationale for decisions that deviate from prior recommendations or community-endorsed plans.
- 3.2. Committing to a transparent review of the allocation decision and its alignment with local and national planning policies.
- 3.3. Ensuring future planning decisions involve meaningful community engagement, respecting the principles and priorities set out in local plans.

Without these measures, the Parish Council fears that residents will continue to lose faith in the planning process, creating barriers to achieving balanced and sustainable growth in the future.

4. Misalignment with Strategic Policies

The proposed increase in housing allocation at Wintergardens (Brcly_12) conflicts with key strategic policies at both national and local levels. These policies are designed to ensure that development is sustainable, proportionate, and respectful of the unique character and capacity of local areas. By exceeding the original recommendation of 70 dwellings, this proposal undermines established principles of good planning and sustainable growth.

4.1. National Planning Policy Framework (NPPF)

The NPPF emphasizes the importance of aligning development with sustainability principles:

- 4.1.1. **Paragraph 8 – Achieving Sustainable Development:** Developments must balance social, economic, and environmental objectives. Increasing the housing allocation to 100 dwellings, without sufficient infrastructure investment, disrupts this balance, particularly in its environmental and social impacts.
- 4.1.2. **Paragraph 20 – Strategic Policies:** Requires planning policies to ensure infrastructure and community facilities are adequate to support proposed growth. This increase disregards the capacity limitations of Broadclyst’s existing infrastructure, as noted in the Officer’s original recommendation.
- 4.1.3. **Paragraph 127 – Well-Designed Places:** Calls for developments to be sympathetic to the local character and surrounding built environment. A 40% increase in the number of dwellings compromises the character of Broadclyst, a rural parish with limited capacity for high-density development.
- 4.1.4. **Paragraph 122 – Appropriate Densities:** Requires that decisions take into account infrastructure capacity and the desirability of maintaining the area’s prevailing character. The proposed density for Wintergardens exceeds what is reasonable for the village’s scale and rural setting.

4.2. East Devon Local Plan (2013–2031)

The East Devon Local Plan similarly emphasizes sustainable growth:

- 4.2.1. **Strategy 7 – Development in the Countryside:** Restricts development in rural areas unless it is proportionate to the settlement’s capacity. Increasing housing allocation to 100 dwellings at Wintergardens undermines this principle.
- 4.2.2. **Strategy 36 – Sustainable Villages:** Requires that new housing allocations in rural settlements respect infrastructure capacity, character, and community needs. This increase fails to meet these criteria and risks overwhelming local services.

- 4.2.3. **Policy D1 – Design and Local Distinctiveness:** Mandates that developments respect the scale, massing, and character of their surroundings. The proposed allocation contradicts this policy by introducing an excessive density to a village with a predominantly rural character.

4.3. Misalignment with Community-Led Planning

The Broadclyst Neighbourhood Plan further reinforces these strategic principles:

- 4.3.1. **Policy H1 – Sustainable Housing Growth:** States that housing development should be proportionate to the scale of Broadclyst and supported by adequate infrastructure.
- 4.3.2. **Policy E2 – Protecting the Landscape Character:** Highlights the importance of safeguarding the parish’s rural and ecological character, which is threatened by the increased housing allocation.

Failing to align with these policies risks setting a precedent for disproportionate development, undermining the integrity of the planning framework.

4.4. Implications of Policy Misalignment

Research highlights the consequences of disregarding strategic planning principles:

- 4.4.1. The **RTPI’s Planning Horizons Report (2014)** stresses that developments misaligned with local policies often lead to community resistance and diminished public trust in planning authorities.
- 4.4.2. **Healey (1997)** argues that sustainable development depends on coherence between national frameworks, local strategies, and community plans. Divergence from these principles undermines the legitimacy of planning decisions and their long-term success.
- 4.4.3. Studies such as **Barton et al. (2010)** show that over-densification without adequate infrastructure leads to environmental degradation and deteriorating public health outcomes.

4.5. Recommendations

East Devon District Council must align its decision-making with strategic policies by:

- 4.5.1. Reinstating the original recommendation of 70 dwellings, respecting the capacity and character of Broadclyst.
- 4.5.2. Ensuring that all development proposals are tested against local and national policies, with clear evidence to support any deviations.

- 4.5.3. Requiring any approved developments to include infrastructure enhancements and environmental protections proportionate to the scale of growth.

By adhering to these measures, the Council can ensure that development at Wintergardens aligns with strategic policies, supports sustainable growth, and respects the unique identity of Broadclyst.

5. Requests for Action

Considering the above, Broadclyst Parish Council respectfully requests the following actions:

5.1. Reconsideration of the Housing Allocation

That East Devon District Council reverses the decision to increase the housing allocation at Winter Gardens to 100 dwellings and reinstates the original cap of 70 dwellings as recommended by the Officer.

5.2. Commitment to Community-Led Planning

That future decisions are informed by robust community consultation, ensuring that local voices are heard and incorporated into strategic planning.

5.3. Transparency and Accountability

That East Devon District Council provides a public explanation of the decision-making process that led to the increased allocation, including a rationale for deviating from established recommendations.

6. Mitigation Measures

Should any development proceed at Winter Gardens, we urge the Council to implement the following mitigations:

- 6.1. Separate access for employment traffic to avoid disruption to residential areas.
- 6.2. Improved pedestrian and cycle connectivity to enhance safe access to local amenities.
- 6.3. Assurance that land allocated for self-build plots is protected to meet identified local needs.
- 6.4. A strong local connection criterion for affordable housing units.
- 6.5. That the site be delivered through a phased Masterplan alongside neighbouring allocation, Brcly_29, so both sites maximise safe opportunities for vehicle routing and pedestrian/cycle movements.

7. Conclusion

Broadclyst Parish Council urges East Devon District Council to carefully reconsider the decision to increase the housing allocation at Winter Gardens (Brcly_12) to 100 dwellings. This proposal conflicts with fundamental principles of sustainable development, as outlined in the National Planning Policy Framework (NPPF), the East Devon Local Plan, and the Broadclyst Neighbourhood Plan.

The Parish Council has raised the following critical concerns:

1. **Inadequate Infrastructure Capacity:** The increase to 100 dwellings disregards the limited capacity of Broadclyst's existing infrastructure, as highlighted in the Officer's original recommendation. Without substantial investment, essential services such as roads, schools, healthcare, and community amenities will be further overstretched, compromising residents' quality of life.
2. **Disregard for Community Engagement and Local Planning Policies:** This decision undermines the aspirations and priorities set out in the Broadclyst Neighbourhood Plan, which was developed through extensive community consultation. The lack of meaningful engagement has left residents feeling excluded from decisions that directly impact their lives.
3. **Erosion of Public Trust:** By deviating from prior recommendations and failing to provide clear justification, the decision-making process has fostered a perception of opacity and diminished public confidence in the planning system. Trust is essential for effective governance and community cooperation in future developments.
4. **Misalignment with Strategic Policies:** The proposed allocation contravenes key policies in the NPPF and East Devon Local Plan, which emphasize the importance of proportionate, infrastructure-supported, and character-respecting growth. It also risks undermining the integrity of planning frameworks by setting an unsustainable precedent for Broadclyst and similar rural settlements.

The Officer's original recommendation of 70 dwellings represents a balanced and sustainable approach to development, reflecting Broadclyst's infrastructure limitations and rural character. Increasing the allocation to 100 dwellings disregards this professional assessment, leading to development that is disproportionate and unsustainable.

The Importance of a Thoughtful and Considered Review

This decision is not merely about one site; it has wider implications for planning governance, public trust, and the long-term sustainability of East Devon's rural settlements. By approving disproportionate growth, EDDC risks:

- Compromising the health and well-being of Broadclyst's residents through overburdened services and infrastructure.

- Undermining the credibility of strategic planning policies, both locally and nationally.
- Eroding public trust, leading to increased resistance to future developments and reduced community engagement.
- Setting a precedent for unsustainable, infrastructure-deficient growth in other rural areas.

Broadclyst Parish Council respectfully requests that EDDC take the following steps:

- Reconsider the proposed allocation and reinstate the original recommendation of 70 dwellings.
- Conduct a transparent review of the decision-making process and its alignment with relevant policies and plans.
- Commit to a collaborative, community-focused approach in future planning decisions, ensuring that Broadclyst's unique character and assets are preserved.

By addressing these concerns, EDDC can demonstrate its commitment to sustainable development, sound governance, and the well-being of its communities. Broadclyst Parish Council looks forward to your considered response and remains available for further discussion to ensure an outcome that benefits both the Parish and the wider district.

We appreciate your attention to these concerns and look forward to your response.

Yours Faithfully,

AMS Hurren

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Broadclyst Parish Council CEO and Responsible Finance Officer

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