



Broadclyst Parish Council
GROWING OUR COMMUNITY

Broadclyst Parish Council
19 New Buildings
Broadclyst
Exeter
EX5 3EX
15/01/2023

Your ref:
Our ref: EDDC_LP_Jan_2023

To: East Devon District Council
Strategic Planning
(Via email / consultation portal)

Dear Sir/Madam

Ref: new Local Plan consultation

Please find attached Broadclyst Parish Council's comment on the draft new Local Plan.

Yours Faithfully,

AMS Hurren

Mrs Angie M Hurren BEM
BA(Hons), Fellow SLCC
Broadclyst Parish Council CEO and Responsible Finance Officer

1. Introduction

The Council's response includes comments provided by members of the local community, who have worked together to formulate specific comments in relation to site allocations in Broadclyst.

We are appreciative of the work done by this group of residents and acknowledge their passion for their community setting, historic built environment, and extensive biodiversity.

2. Broadclyst Neighbourhood Plan

- 2.1. The Broadclyst Neighbourhood Plan seeks to identify development that is relevant and proportional to its community's size and needs.
- 2.2. Allocations have been informed through a call for sites process, strategic housing needs analysis, robust community consultation process, technical desk and field-based assessments, and expert advice from Locality, independent planners, and EDDC planning department alike.
- 2.3. The Broadclyst Neighbourhood Plan (NP) sets out, directly in line with outcomes of consultation with residents, the requirements for the village. Legislation gives the draft Broadclyst NP significant weight as a planning policy document; it is anticipated that it will be 'made' in May 2023.
- 2.4. Technical expertise and advice during the NP preparation has been provided by various external independent parties including Locality experts, and East Devon District Council (EDDC) officers, including Clare Rodway, Angela King, and Simon Bates.
- 2.5. Comments on draft policies in the Local Plan, where applicable, have been informed by policies in the Broadclyst Neighbourhood Plan.

3. General comments

3.1. Sustainable Development in Rural Areas

- 3.1.1. National Planning Policy framework statement 79 suggests that housing development in rural area should be located where it will enhance or maintain the vitality of rural communities, identifying opportunities for villages to grow and thrive and support local services.
- 3.1.2. One of the biggest concerns of residents is that increasing the size of the village by 15% will put intolerable pressure on already struggling local services. It is felt that development on this scale, far from enhancing the vitality of the local community, is likely to be detrimental. Without remedial action, a swell in population will be especially difficult for the local primary and secondary schools (all full), and the GP surgery (at capacity).

3.2. Flooding

3.2.1. In line with sections 159 and 160 of The National Planning Policy Framework, a full flood risk impact assessment should be undertaken, in particular focussing on how the run-off from surface water could potentially increase flood risk of neighbouring properties and on roads leading up to Burrow Farm.

3.3. Achieving well-designed places

3.3.1. If development is permitted at LP_Brcl_29 and LP_Brcl_12 we require full adherence to National Planning Policy statement 131, with tree lined streets, and retention of existing older trees. Both sites are surrounded and criss-crossed by many hundreds of metres of hedgerows, and we would like assurance that the significant environmental harm from removing these would be mitigated. We would also want existing public footpaths across the fields at these sites to be well maintained.

3.3.2. Broadclyst is a beautiful village, surrounded by National Trust Land. There are concerns that development on this scale could be detrimental to the intrinsic character of the village, particularly the historic Eastern side of Broadclyst, abutting the proposed sites. This part of the village has many listed and thatched buildings. In particular, with reference to site LP_Brcl_29, any development here would have a direct impact on Lake House which is Grade 2 Listed. The land proposed is also on an elevation that could dominate the surrounding environment. If development is allowed to go ahead, we suggest it must be in keeping with the historic setting and adhere strictly to the design codes set out in The Broadclyst Parish Neighbourhood Plan.

3.3.3. We would like EDDC to establish a protected Green Belt around any potential new development to prevent more urban creep. It is worrying for residents to see so much urban expansion around our village, and it is felt that if this is not done, it misses an opportunity to allow Broadclyst to retain its special and unique character, without which it is destined to become a suburb of either Cranbrook or Greater Exeter in the decades to come.

3.4. Habitats and Biodiversity

3.4.1. In line with National Planning Policy Statement 180, development in the countryside often has a harmful impact on biodiversity. Sites LP_Brcl_29 and LP_Brcl_12 are grade 1 agricultural land; residents are concerned that there are a number of red and amber listed bird species, some specific to farmland habitat such as skylark and linnet. Bats also use the hedgerows to navigate and the dark skies as cover from predators. Any development at these sites will be detrimental to these species by removing specific habitat, removing their navigation method, and increasing the ambient light. There is a pond on site LP_Brcl_12, the loss of which would be detrimental to wildlife. We would like to see this feature maintained. One of the nearby cottages is a designated site for Great Crested Newts.

3.4.2. In the Clyst Vale Regional Park consultation document there was specific mention of the Winter Gardens site (LP_Brcl_12) as being an important habitat for invertebrates. We therefore would like to see a full environmental and biodiversity impact assessment, commissioned prior to development being agreed, and a proper plan for mitigation if development is allowed to go ahead. It's not possible to know what could be lost if nobody looks! There are several significant habitats near the proposed sites including Ashclyst Forest and Elbury Farm, the first is nationally important for butterflies and the second for rare fungi and Barn Owls. We also feel that given the numbers of bats that have been seen in the Town End area, a survey focussing on this species is vital.

4. Section 4: Addressing housing needs and identifying sites for development

4.1. Methodology:

4.1.1. The referencing system used (option 1, option 2, etc) implies a hierarchy exists. When conducting research, neutral coding should be used to not imply any subconscious preference to the respondents. To do so suggests an element of bias and predetermination.

4.1.2. The response methods are not fully inclusive. Such is the preference for online submission of comments via the commonplace portal that the options to submit representation via email, post, or another platform is not obvious.

4.1.3. Support for people with additional needs is not obvious; the exclusion by omission of provision for this group is undemocratic and inequitable.

4.2. Generally, we would like to see greater encouragement, priority and support given to the regeneration of brown field sites rather than green field development. Many of the proposals in the new Local Plan consultation are going to take a substantial acreage of agricultural land, much of which are still working / viable farms, out of farming and food production for ever. It is appreciated that redevelopment of brown field sites is comparatively expensive and that this in turn impacts site viability, but this must not be allowed to be the main determining factor on land use.

4.3. Strategic Policy 25 - Development at Local Centres (Broadclyst)

In principle, the *proportional* organic development of local centres is supported, however the key word here is *proportional*. There is further detailed comment specifically on the three proposed Broadclyst sites in point 6.1

4.4. Strategic Policy 26 - Development at Service Villages (Westclyst and Whimble)

4.4.1. Development options at Whimble.

Development in service villages must be proportional and appropriate. A strong design code and protection for village identity and assets must bear considerable weight through the planning process. Where such development

would provide new services, these must be delivered in a timely manner so as to not overburden existing local services. Supporting infrastructure for such proposals must be identified, along with funding for them, on the Infrastructure Delivery Plan (IDP).

4.4.2. Development options at Westclyst

We agree with findings that there are no options for strategic development at Westclyst. The Broadclyst NP makes no allocations but seeks to protect woodland and improve green infrastructure connectivity.

5. Section 5: Future growth and development on the western side of East Devon

We are pleased to note that the Local Plan recognises the “Emerging and advancing plans at Clyst Honiton and Broadclyst are seeking to bring their own preferred sites forward for development and to ensure all future development meets their local needs and deliver real benefits for their local communities.” The Localism Act 2011 put communities right at the heart of Plan-making, understanding that residents are best placed to know what development is needed and where it should go in their towns and villages. An evidence-based Plan, we firmly believe that the ‘bottom-up- approach used to write a community-led Plan is a much better method than the top-down, often developer-led, approach more usually seen in strategic planning.

5.1. Strategic Policy 8 – Development of a second new town east of Exeter. Whilst the principle of development of a new town is supported and preferred to the overdevelopment of small villages where the impact of development overall would be harmful, this support is subject to the following points:

5.1.1. It must be delivered by the LPA (not developer) through a phased Masterplan which sets out clear timeframes and delivery mechanisms for housing, community infrastructure, employment provision, transport and highways infrastructure, healthcare, and education provision. The IDP as part of the Masterplan, must be watertight and robust.

5.1.2. Lessons learnt through Cranbrook and Sherford must be heeded and not repeated.

5.1.3. Development must be delivered in a way that recognises that a new community is so much more than bricks and mortar; sites must not be sub-divided into smaller plots so that triggers for community infrastructure provision are avoided.

5.1.4. Measures such as making monetary S106 contributions to mitigate impacts are not always the success that was indicated on paper. An example is where contributions are given to the bus company for expansion of operating times, new routes, increased frequency etc to serve the new developments, but then fail due to commercial pressures on the third-party provider. In the same way, we have already seen huge increasing demand on the healthcare services in the west end of East Devon to the point that GP surgeries are over capacity,

expansion on the current site(s) is not always possible, new provision is not adequately secured or funded through the 106 and so does not happen.

5.1.5. Green belt land must be identified and protected to prevent eventual absorption of the new town by Exeter and Cranbrook.

5.2. **Strategic policy 9** that “All new buildings and supporting infrastructure will need to be of the highest standard to include buildings to BREEAM Excellent or equivalent standard. New buildings will need to connect to the district heating network on Science Park and Sky Park” is supported. This principle should be reflected across all new developments, not just those in the west end.

5.3. **Strategic policy 10** – Exeter Science Park, is supported in principle. We welcome the restriction that “Other than for supporting infrastructure, planning permission will not be granted for built development that comprises of non-business or for businesses that do not accord or align with Science Park objectives”.

5.4. **Strategic policy 11** – Land north of the Science Park, is supported in principle. We welcome the restriction that “Other than for supporting infrastructure, planning permission will not be granted for built development for non-business job generating uses.”

5.5. **Strategic policy 12** – High quality employment north of Sowton village. The principle of development of an employment site is supported; however, the impact of the proposal on the traffic flow in the area must be carefully assessed. The proposal site is accessed solely via a major trunk route through the west country which is under considerable strain for peak times of the working week and through the holiday period. (See section on highways infrastructure). The historic setting of Sowton village must not be compromised by such development.

5.6. **Strategic policy 13** – Exeter Airport and its future operation and development. The airport, its activity, and new development around it must have a harmonious relationship, neither being disadvantaged by the other. On one hand, the airport provides a vital link with the southwest peninsula for goods and tourism, and is an important research, development and training centre for the aviation industry; on the other is the damage air travel causes to the planet. Neutral

5.7. **Strategic Policy 14** – Employment land to the east of airport buildings. Support in principle, subject to use restrictions set out. If B8 is to be permitted, highways infrastructure improvements must be secured prior to permission.

5.8. **Strategic Policy 15** – Employment land east of the Airport and north of the A30. Support in principle, subject to use restrictions set out. If B8 use is to be permitted, highways infrastructure improvements must be secured prior to permission.
NB: point 5.47 refers to the Broadclyst Neighbourhood Plan proposes two sites for development/regeneration near the Cranbrook boundary. These has since been withdrawn, and so this sentence should be disregarded when analysing responses to the Local Plan consultation.

- 5.9. **Strategic Policy 16** – Green infrastructure and the Clyst Valley Regional Park.
Supported (please refer to the Broadclyst Neighbourhood Plan for justification and evidence of support for the CVRP and trail)
- 5.10. **Strategic Policy 17** – Development next to the M5 and north of Topsham.
Support in principle, subject to “significant investment in local infrastructure” (Clyst St George NP, 2019).
- 5.11. **Strategic Policy 18** – Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line.
- 5.11.1. A large section of this site is floodplain; there are concerns for potential water course contamination and for environmental pollution downstream of the site, which is an area identified as coastal and floodplain grazing marsh and is listed as being of 'principle importance under section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. We believe residential development on this site would be contrary to paragraph 170 of the NPPF.
- 5.11.2. Sustainability: An application for residential development on the field immediately opposite the proposed site was refused as it is in “an unsustainable location, with limited transport options and accessed via an unlit narrow lane lacking in footways, passing spaces, with no refuge for pedestrians, and the constrained width of the railway bridge. As such it is considered that cycling or walking to the shops, school and transport links would be difficult and undesirable, such that it would fail to comply with Strategy 7 (Development in the Countryside) and Policy TC2 (Accessibility of New Development) of the East Devon Local Plan 2013-2031, and the guidance contained within the National Planning Policy Framework.”
- 5.11.3. Of greater concern for the welfare of future occupants, the Officers report also found that “The location of the site, adjacent to and at a lower level to the M5 motorway is such that the occupation of the proposed buildings will result in a sub-standard level of amenity for future residents due to the unacceptable level of traffic noise which would exceed WHO guidelines and those identified in BS8233:2014 Sound Insulation and Noise Reduction.” The proposed site layout would have to concentrate its residential area to the centre/north of the site due to the flood zone, so the residential part of the site will be subject to the same unacceptable levels of traffic noise which would exceed WHO guidelines and those identified in BS8233:2014 Sound Insulation and Noise Reduction.
- 5.11.4. For these reasons, we do not support residential development or residential occupation of any kind on this site.

6. **Section 6: Strategy for the development at principal centres, main centres, and service villages. Strategic Policy 25 – Development at Local Centres.**

There has been a recent change in government policy. *“Gove drops mandatory targets for new homes after MPs rebel – Councils will no longer be forced to comply with mandatory housebuilding targets as part of concessions to head off a backbench rebellion on planning. Under a deal agreed between Michael Gove, the housing secretary, and senior Tory rebels, local authorities will be allowed to build fewer homes if they can show that meeting centrally imposed targets would significantly alter the character of the area.”* (The Times, 06.12.2022). It is hoped that as EDDC prepares its new Local Plan, given its significant constraints on available housing land across the district (SSSI, Jurassic Coast, AONB, etc) that a reduction in the overall number of housing allocations will be seen.

It is noted that EDDC confirms “This draft plan sets out what are intended to be a workable set of policies for determining planning applications. The plan also identifies (‘allocates’) areas of land that are seen from assessment to date as being appropriate or reasonable for development. However, it is stressed that it is a draft plan, we are welcoming feedback and all comments received will be taken into account in redrafting and refining the plan.” The following text is specifically in relation to Policy 25 and focusses on the preferred site allocations for Broadclyst: LP_BRCL_09, LP_Brcl_12, and LP_Brcl_29.

6.1. All three site allocations seen in the Local Plan were considered in the Broadclyst NP preparation:

6.1.1. **Site Brcl 09** received majority support for development from the community in every round of consultation and is in the final draft as a site for 15 homes. It is considered proportional and natural extension to the village, and although any development brings pressure on infrastructure, it was felt that the allocation of an additional maximum of 15 homes was not significant.

6.1.2. **Site Brcl 12** was presented for consideration during the Call for Sites as both a housing site and an economic site.

Housing: following an external consultant’s desk-based analysis on the proposed sites, Broadclyst NP steering group was advised that site 12 was too big to bring forward through a NP and should therefore be removed from the Broadclyst NP.

Economic: consultation responses for economic re-development of the buildings were as follows:

- a. Quantitative: with 61% of votes in favour, this site has the support of the community.
- b. Qualitative data:
 - i. Good support for employment use and to support small businesses;
 - ii. The loss of agricultural land is not a material consideration;
 - iii. The environmental impact will be assessed by AECOM;

- iv. Support for regeneration of brown-field site;
- v. Concerns about access and additional traffic;
- vi. Consider a condition for no B8 use
- vii. Village is sustainable location;
- viii. Development to be subject to noise impact assessment and mitigations if necessary

6.1.3. **Site Brcl_29** was found by the desk-based assessment to be acceptable for delivery through a NP and progressed through to the first round of public consultation. However, access to the site was a major concern and the site only received support from a total of 31% of consultation respondents, so was withdrawn by the Steering Group and did not progress any further in the draft Neighbourhood Plan.

6.2. **Vehicular traffic.** The new developments will increase the volume of traffic on the unclassified road that links the sites to the main village. All vehicular traffic will have to use the unclassified road network to access the B3181 and village centre. There are two access points from the B3181 into Broadclyst village. Access to the south and west of the village is via single track country lanes. Residents and Councillors are extremely concerned that this additional traffic cannot be accommodated on the local highway network without causing significant detrimental impact on road safety.

6.3. **Pedestrian networks.** Should the site be allocated in the Local Plan, it is essential that pedestrian access to the village centre, and both schools, is significantly improved. At present there are no pavements connecting LP_Brcl_29 and LP_Brcl_12 to both schools and the bus stops, and similarly there is insufficient pedestrian access connecting LP_Brcl_09 to Clyst Vale College and the bus stop. Lack of safe pedestrian routes will encourage car usage.

7. Section 7: Tackling the climate emergency and responding to climate change

7.1.1. **Strategic Policy 27: Climate Change.** Broadclyst parish council support the climate emergency through its emerging Neighbourhood plan through policies: DC1: Energy Efficient New Buildings; DC2: Increasing Energy Efficiency of Existing Buildings; DC3: Sustainable Drainage; DC4: Residential storage; DC5: District Heating Schemes; DC6: Community Led Renewable Energy Production.

7.1.2. Strategic policy 28 to Strategic Policy 32

7.1.2.1. As per policies in Strategic Policy – Climate Change

7.2. Strategic policy 33 Heat networks

7.2.1. Broadclyst Parish Council support renewables energy schemes through the Broadclyst Neighbourhood Plan policy DC5: District Heating Schemes

7.3. Strategic policy 34 Embodied Carbon

7.3.1. Broadclyst Parish Council support renewables energy schemes through the Broadclyst Neighbourhood Plan policy DC1 & 2: Energy efficient new buildings and Increasing energy efficiency of existing buildings

7.3.2. Tree replacement policy (NE3) requires the replacement of trees to replace woodland and the tree coverage across the parish in line with the Devon 3/2/1 formula – at least 3 new trees for the loss of a large tree; 2 for the loss of a medium tree; 1 for the loss of a small tree.

7.4. Strategic policy 35 Flooding

7.4.1. Broadclyst Parish Council support to improve flooding in the parish through the neighbourhood policy NE7 which is to improve natural flood management of rivers to reduce the impact of flooding throughout the parish and to provide support for the development of flood defence schemes in the parish.

8. Section 8: Meeting housing needs for all

8.1. Strategic policy 39 through 41

Broadclyst Parish Council support this policy through the Neighbourhood plan policies on Housing which aims to provide housing to meet local needs, to increase accessibility and affordability of housing for local people, to increase provision of self-build and live-work units. Policies H1, H2, H3, H4, H5, H6, H7.

8.2. Strategic policy 42 – Accessible and Adaptable Housing

The Broadclyst Neighbourhood Plan understand the importance of Accessible and Adaptable housing through reference to the design quality in the Design Introduction P.47/48 in the Neighbourhood Plan.

8.3. Strategic policy 43 – Market Housing Mix

The Broadclyst Neighbourhood plan support market housing mix with policies H1, H2, H3, H4

8.4. Strategic policy 44 – Self-build and custom Build Housing

The Broadclyst Neighbourhood plan support self-build and custom build housing with policies H5, H6

8.5. Strategic policy 45 – Residential sub-division of existing dwellings and buildings and replacement of existing dwellings

The Broadclyst Neighbourhood plan support this through policy DH2

8.6. Strategic policy 46 – Householder Annexes, Extensions, Alterations and Outbuildings

The Broadclyst Neighbourhood plan support this through policy H7, DH2, DC2.

8.7. Strategic policy 49 – Housing for Rural workers

The Broadclyst Neighbourhood plan support this through policy H7 – Development of Live work units.

9. Section 9: Supporting jobs, the economy and vibrant town centres

9.1. Strategic policy 51– Employment development within settlement boundaries

Broadclyst Neighbourhood plan aims to expand and diversify economic development and activity within the Parish. This is done by supporting policies in the Neighbourhood plan EC1, EC3, EW1,

9.2. Strategic policy 52 – Employment development in the countryside

Broadclyst Neighbourhood plan supports employment in the countryside through the Neighbourhood plan policy EW1, ET2, ET3

9.3. Strategic policy 53 – Farm Diversification

Broadclyst Neighbourhood plan supports Farm diversification through policy EC3

9.4. Strategic policy 54 – Resisting the loss of employment sites

Broadclyst Neighbourhood plan supports the resisting the loss of employment sites through policies supporting/encouraging suitable employment sites. See strategic policy 51

9.5. Strategic policy 56 – Town centre hierarchy, sequential approach and impact assessment

Broadclyst is listed as a Tier three local centre

9.6. Strategic policy 58 – Local shops and services

Broadclyst Neighbourhood Plan supports the development of new micro-sizes businesses throughout the parish through policies EC1, EC3, EW1

9.7. Strategic policy 59 – Rural shops

Broadclyst Neighbourhood Plan supports rural shops throughout the parish through policies EC1, EC3, EW1

9.8. Strategic policy 60 – Sustainable Tourism

Broadclyst Neighbourhood Plan supports sustainable tourism through policies ET1 & ET2, ET3

9.9. Strategic policy 61 – Holiday accommodation parks in designated landscapes

Broadclyst Neighbourhood Plan supports holiday accommodation through policies ET3: Caravan and camping sites, ET2: Holiday accommodation

10. Section 10. Designing beautiful and healthy spaces and buildings

10.1. Strategic policy 62 – Design and local distinctiveness

This policy can be related to the Broadclyst Neighbourhood Plan Design and Climate section and the Broadclyst Parish Design code Appendix 14 in the Broadclyst Neighbourhood Plan

10.2. Strategic policy 63 – Housing Density and Efficient Use of land

The Broadclyst NP sets a housing density at or below 21 per hectare, with local housing Strategic Policy densities in comparison being 30 per hectare at Westclyst and 40 at Cranbrook. This density was set to support local community support for smaller scale housing sites with lower densities in order for development sites to be in keeping with their settings and local infrastructure.

11. Section 11. Prioritising sustainable travel and providing the transport and communications facilities we need

11.1. Strategic policy 65 – Walking, cycling, and public transport

Broadclyst Neighbourhood plan is in full support of active travel with policies supporting this: T1, T2, T4, T5. The aim of the Broadclyst Neighbourhood plan is to increase infrastructure and provision of and for sustainable modes of travel and to enhance the movement of people and traffic in and across the Broadclyst Parish.

11.2. Strategic policy 66 – Protecting transport sites and routes

The Clyst Valley Trail comes through Broadclyst Parish. The Broadclyst Neighbourhood plan contains a policy T4 – Active Travel Infrastructure policy which seeks protection, enhancement, and extension of cycle routes. This policy also includes footpaths, bridleways, and multi-use trails. Other policies that support active travel through Broadclyst through the Broadclyst Neighbourhood plan are: T1, T2

11.3. Strategic policy 67 – Travel plans, transport statements, transport assessments

Broadclyst Neighbourhood plan aims to increase infrastructure and provision of and sustainable modes of traffic Section 5 – policies T1,2,4,5. Within policy T4, it states the Broadclyst Neighbourhood plan supports development of ‘low traffic neighbourhoods’ in settlements and in all new large scale (over 50) residential developments that provide a network of quiet streets with safe crossings across main roads for walking and cycling.

11.4. Strategic policy 68 – Parking Standards

The Broadclyst Neighbourhood plan supports parking provision with policy T3: Parking provision. This is to include residential parking, non-residential parking, parking and energy generation. This includes electric vehicle charging points.

11.5. Strategic policy 69 – Rear servicing of shopping/commercial development

The Broadclyst Neighbourhood plan supports this with policy T3 – non-residential parking

11.6. Strategic policy 70 – Safe vehicular access to sites

The Broadclyst Neighbourhood plan supports this with policy T3

11.7. Strategic policy 72 – Digital Connectivity

The Broadclyst Neighbourhood plan supports the provision of Superfast Broadband across the parish to help with the Economic viability of small work hub/ live to work units and small business which helps to encourage the work from home balance.

12. Section 12 Caring for our outstanding landscape

12.1. The Council has worked within sensitivities described in the Killerton Setting Study when allocating sites for development in its Neighbourhood Plan.

12.2. Policies 74-77 are supported in principle.

12.3. Policy 78: Not supported.

The Council does not agree with the statement that development in Green Wedges will be supported if it cannot be located elsewhere, and that it would not compromise, individually or cumulatively with other existing or proposed development, the integrity of the green wedge, either by diminishing its physical extent or through visual intrusion. The protection to land identified as a Green Wedge must be sacrosanct and upheld without exception.

12.4. Policy 79. Not supported.

The Council does not agree with the statement that development in Local Green Space or Land of Local Amenity Importance areas, development will be restricted to those limited types of appropriate development set out below, unless very special circumstances can be demonstrated. Local Green Space or Land of Local Amenity Importance areas must be protected from development without exception or exemption.

12.5. Policies 80, 81, 82 are supported in principle.

12.6. Policy 83, development on High Quality Agricultural Land is not supported. It is felt that the policy wording is too vague and that it offers too many opportunities to be overridden.

13. Section 13 Protecting and enhancing our outstanding biodiversity and geodiversity

The Council supports all draft policies in this section. Our own Neighbourhood Plan also seeks to protect and enhance biodiversity, and requires a net biodiversity gain of at least 10% on all development.

14. Section 14. Open space, sporting and recreation facilities

14.1. Strategic policy 96 – Access to open space and recreation facilities

Broadclyst Neighbourhood Plan supports the protection, enhancement, and allocation of important local green spaces with policy NE6

14.2. Strategic policy 97 – Land and buildings for sport, recreation, and open space areas in association with development.

The Broadclyst Neighbourhood Plan, section 1. Community Facilities and services aim to provide a new community sports hub, to maintain and improve existing community facilities and to provide additional community spaces for sports, leisure, and recreation with policies CF1 and CF2.

14.3. Strategic policy 98 – Location of facilities for sport and recreation, open spaces and allotments

The Broadclyst Neighbourhood Plan, section 1. Community Facilities and services aim to provide a new community sports hub, to maintain and improve existing community facilities and to provide additional community spaces for sports, leisure, and recreation with policies CF1 and CF2.

14.4. Strategic policy 99 –Retention of land and buildings for sport and recreation use

The Broadclyst Neighbourhood Plan supports the retention of land and buildings for sport and recreation use with policy CF2.

15. Section 15. Our outstanding historic environment

15.1. Strategic policies 102 through 106

The Broadclyst Neighbourhood Plan supports to protect historic structures, landscapes and buildings which determine the heritage character of settlements and landscapes within the parish. Policies D1: High Quality Design alongside the Broadclyst Parish Design code 2021 (appendix 14) DH1: Historic Character, DH2: Development of existing buildings an and adjacent to the conservation area, DH3: Historic restoration

16. Section 16: Ensuring we have community buildings and facilities

16.1. It is recognised that a new community is so much more than bricks and mortar; sites must not be sub-divided into smaller plots so that triggers for community infrastructure provision are avoided, or smaller facilities and amenities are funded.

16.2. The council supports policy 107 and 108.

17. Section 17: Implementation and monitoring of the Local Plan

Highways Infrastructure comments

17.1. Policy

- 17.1.1. Research conducted by the RTPI that looked at the sustainable elements of new development found that when comparing journey methods (vehicle, public transport, foot) “many travel times extend well beyond a comparable journey by car which discourages more sustainable modes of transport” (RTPI, 2021)
- 17.1.2. Poor, unreliable, and reduced bus and train services across the west end have caused misery to residents in 2022 and have had a negative impact on commuters, the economy and education. Even in better times, the public transport network is woefully inadequate across the west end of East Devon, with many households not even in a position to consider using an alternative mode of transport. Whilst the ambition and need to reduce reliance on the private car is without question and should remain firmly enshrined in policy, a pragmatic view of how to achieve this in East Devon should be applied when allocating development sites in the Local Plan.
- 17.1.3. The National Planning Policy Framework is clear that public transport must be taken into account when deciding where development should happen.

17.2. Strategic network

- 17.2.1. Junction 29 and 30 of the M5 are already either at or nearing capacity. Good access to the west country is vital for the economy of the southwest peninsula for the local Exeter and surrounding economy. If a second town is also to be built, the impact on the strategic and local highways network must be adequately mitigated.
- 17.2.2. Funding for such improvements should be secured as part of the local plan delivery process, with full / outline / MOUT consent for sites agreed in the Local Plan not being given unless funding for significant infrastructure improvements has been agreed. The mechanism to do this across the west end should be agreed; it is unreliable and ineffective to rely solely on S106 contributions from specific sites. County does not necessarily have the resources to ‘pump prime’ delivery of highway infrastructure improvements, and so contributions have to be available in a timely fashion.

17.3. Local Highways network

- 17.3.1. The new Local Plan does not suggest mitigations for the displacement of Exeter-bound traffic from new developments in the West End as it seeks to re-route away from congested routes such as the A30/M5 junction 29, Moor Lane/Heavitree, Countess Wear/Topsham Road. The Pinhoe Area Access Strategy needs updating to bring it in line with the Exeter Transport Strategy and proposals in the EDDC local Plan and Exeter City Council Local Plan.

17.3.2. Crannaford Lane.

17.3.2.1. Broadclyst village is surrounded by country roads, many of which are single track in places. Crannaford Lane is a single-track rural lane which runs from immediately opposite Site 12 & 29 to Cranbrook. It is not 'just a lane', it is one of two north-south routes linking the A30 and the B3181, Station Road being the other (which is subject to being closed due to flooding at the Three Fords). Devon County Council has a log of complaints relating to Crannaford Lane, which itself is subject to flooding near the railway crossing / Cranbrook Education Campus and is in poor condition with deep ruts either side of the tarmac where vehicles have created unofficial 'passing places'. The other southbound road from sites 12 and 29 is Elbury Lane, identified by Simon Bates, EDDC GI Officer, as being appropriate for downgrading to a quiet lane in the Clyst Valley Regional Park, for the enjoyment of pedestrians, cyclists, and horse riders.

17.3.2.2. It is not unreasonable to presume that significant development in the south of Broadclyst village will cause a noticeable increased volume of traffic on Crannaford Lane. In January 2023, the Broadclyst Neighbourhood Plan Independent Examiner raised concerns at the level of traffic already on Crannaford Lane when asked to consider a mixed-use site at Crannaford Crossing. His response to proposals in the Broadclyst Neighbourhood Plan indicates that development that causes additional traffic on Crannaford lane and railway crossing should not be supported.

17.3.2.3. If the Planning Authority is mindful to include sites 12 and 29 in its Local Plan, proposals should be drawn up for effective mitigation of the impact of additional traffic movements on Crannaford Lane.

17.3.3. Burrow Lane. The country lane between Town End and Burrow Road is one of the access points to the proposed site LP_Brcl_12. It is a single-track unclassified road, with few passing places; it is also well-used by pedestrians and equestrians. There is no capacity to widen this road. The volume of traffic along this road, parking issues at peak times of day, and the safety of pedestrians and cyclists will be made worse if sites LP_Brcl_29 and LP_Brcl_12 are developed.

17.3.4. Green Tree Lane. The back road from Maple Road to Town end has no pavement for most of its length, requiring both pedestrians and cyclists to stop and lean into the hedgerow when cars come past. There is no capacity to widen this road. Like Burrow Road, it is regularly used as a cut through to get to Broadclyst Primary school and the B3181 from the southern side of the village. The volume of traffic along this road, parking issues at peak times of day, and the safety of pedestrians and cyclists will be made worse if sites LP_Brcl_29 and LP_Brcl_12 are developed. If site 29 is to be included in the Local Plan, alternative access NOT off Green Tree Lane must be identified.

- 17.3.5. Town Hill. This road goes past the primary school and onto the main road B3181. This is a very congested road during the school run. There is a lack of pavement for some of the length of this road (Figure 4). Due to a lack of parking provision at Broadclyst Primary school, this road and the surrounding residential streets are used as collection and drop off points and can become very busy and feel unsafe at times.
- 17.3.6. Clyst Vale College to B3181 bottleneck. This is one of the main routes into and out of the village from the main road going to Exeter and to one of the village bus stops (Figure 5). It is already very congested at peak times which creates an unhealthy environment for pedestrians, who are forced to walk on the road itself in many places due to a lack of pavements. Given the numbers of school children using this route to get to school it needs to be made safer if more development goes ahead in the village.
- 17.3.7. Road From New Inn towards Clyst Vale Community College (Whimble Road). This has no pavements at all for most of its length. If development is to go ahead at sites LP_Brcl_29 and LP_Brcl_12 we anticipate that access would come from somewhere along this road. It would need safe pedestrian access to both Clyst Vale School and the bus stop on the B3181. If this is not implemented, it's highly likely that new residents will be using their cars which does not fit sustainability goals.
- 17.3.8. Burrow Farm Road. The country Lane between Burrow Farm and Hayman's House is single track and often flooded in Winter and Spring and can become impassable (Figure 6). It is very near the proposed development sites at LP_Brcl_29 and LP_Brcl_12.
- 17.3.9. Station Road. This has become a horrible road to navigate at peak times due to the combination of increased traffic since Cranbrook, narrow passing places, sharp bends, the railway bridge which is on a 90-degree angle and the presence of huge haulage lorries that use a depot just after the railway bridge. This road has become a cut through, and also links the village to the Science Park and airport. It is also liable to flooding at the Ford. There is no cycle lane, no consistent pavement, and no bus service.
- 17.3.10. The B3181, B3174, and Cumberland Way are subject to increasing levels of congestion from development at Westclyst, Tithebarn, Monkerton and Pinhoe, already markedly increasing journey times into Exeter.

17.4. Green Infrastructure

- 17.4.1. Improvements to the roads to help cyclists must happen if development is to be sustainable. There are no cycle lanes in the village itself to the main commuter routes to Exeter, and no cycle lane provision on Station Road whatsoever. As mentioned, many of the current lanes are single track, so

there is already a conflict between cyclists and cars. There is a joint cycle lane/pedestrian pavement on the B3181 between Broadclyst and Exeter, but it is poorly maintained and often so overgrown it forces cyclists onto the main road whenever they encounter branches or people walking.

17.4.2. As a rural community, Broadclyst has several nearby liverys and there is concern about the safety of horses and riders with any extra traffic. An impact assessment should be undertaken to see where the risks could be mitigated, for example by extra traffic calming measures and speed restrictions, particularly along the Whimple Road leading past The New Inn and into Dog Village and also along Elbury Lane and Crannaforde Lane, which many horses and riders use daily.

18. Section 18: Monitoring

Broadclyst Parish Council agrees with the proposal that EDDC will produce a series of reports which, in total, will comprise its statutory Annual Monitoring Report.

This concludes Broadclyst Parish Council's representation on the East Devon new draft Local Plan.