

# Local Plan Consultation

Deadline for comments: 5pm, 27<sup>th</sup> June, 2024.

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### 1. Introduction

This report sets out the key aspects and importance of a Local Plan. It summarises progress to date on East Devon District Council's draft of the new Local Plan. It outlines allocations and protections relevant to Broadclyst Parish. It informs readers how to respond to the consultation.

Local Plans are documents that outline how local authorities plan to use land and allocate resources for housing, employment, and other development over a set period.

A Local Plan is a key document created by local authorities in England to guide the future development and use of land in their area. It sets out the vision, objectives, and policies for sustainable growth over a set period, usually 15 to 20 years.

A Local Plan manages and directs growth in a way that is beneficial to the community, economy, and environment. It provides a roadmap for sustainable development and ensures that local planning decisions are made within a clear and strategic framework.

### 2. Key Aspects of a Local Plan:

- 2.1. Vision and Objectives:** The Local Plan outlines a strategic vision for the area's future development, including goals for economic growth, housing, transportation, and environmental sustainability.
- 2.2. Land Allocation:** It designates specific areas for different types of development, such as residential, commercial, industrial, and green spaces, ensuring that land use aligns with community needs and priorities.
- 2.3. Policy Framework:** The plan includes detailed policies that guide decisions on planning applications, ensuring that developments meet certain standards and contribute to the overall vision for the area.
- 2.4. Infrastructure Planning:** It identifies infrastructure needs, such as roads, schools, healthcare facilities, and utilities, to support the planned growth and development.

### 3. Importance of a Local Plan:

- 3.1. Strategic Guidance:** Provides a clear framework for future development, helping to ensure that growth is planned, coordinated, and sustainable.
- 3.2. Community Involvement:** Engages local residents, businesses, and stakeholders in the planning process, ensuring that the plan reflects the community's needs and aspirations.
- 3.3. Certainty for Developers:** Gives developers and investors clarity about where development is likely to be supported, which can attract investment and promote economic growth.

- 3.4. Environmental Protection:** Includes policies to protect and enhance the natural environment, promote biodiversity, and address climate change.
- 3.5. Legal Requirement:** Under the National Planning Policy Framework (NPPF), local authorities are required to prepare and maintain an up-to-date Local Plan. This plan is a statutory document that carries significant weight in planning decisions.
- 3.6. Balanced Development:** Helps balance competing demands for land, such as housing, industry, agriculture, and recreation, ensuring that development is sustainable and benefits the community as a whole.
- 3.7. Addressing Housing Needs:** Identifies sites for new housing developments to meet the needs of the population, including affordable housing.
- 3.8. Economic Growth:** Facilitates economic development by identifying suitable locations for businesses and creating policies that support economic activities.

#### **4. Constraints**

East Devon has statutory designations that constrain development in its area. Such constraints make land in the west of the District that are in proximity to Exeter a focal point for development.

The New Local Plan

- focuses new development on western side of the district, including a new town and other major strategic developments
- promotes significant development at Exmouth, and in 'main centres' at Axminster, Honiton, Ottery, Seaton and Sidmouth
- supports development at 'Local Centres' of Broadclyst, Budleigh Salterton, Colyton, Lympstone and Woodbury.
- Service villages (approx 25)

#### **5. This Consultation**

Following feedback on the original Regulation 18 Draft Plan consultation (Nov 22-Jan 23) (<https://eastdevonlocalplan.commonplace.is>), this consultation asks only for feedback on eight specific topics. It can be accessed via <https://eastdevonlocalplanspring24.commonplace.is> Hard copies should be available in Clyst Vale Community College Library.

The eight topics are:

- New Housing and Mixed-Use Site Allocations
- New Employment Site Allocations
- Designated Neighbourhood Area Housing Requirements
- Clyst Valley Regional Park
- Town Centre Retail Areas
- Coastal Preservation Area
- Green Wedges
- Sustainability Appraisal

## **6. Timeline**

### **6.1. Consultation, engagement and evidence work**

- Call for sites – multiple dates
- Issues and Options 2021
- Draft Local Plan consultation Nov 22-Jan 23.
- Evidence gathering – ongoing
- Upcoming consultation May-June 24

### **6.2. Forward looking timetable**

- Committee to consider redrafted plan chapters and development sites, this will be ongoing until Autumn 24
- Current and past consultation to inform thinking
- Master planning of new community
- Final Publication Plan (Reg 19) to committee November 2024
- Publication Plan consultation Dec 24-Jan 25
- Submission of Plan for Examination May 25
- Exam thru 25 into 26
- Adoption before end 26 (govt deadline)
- Topics for Further Consultation
- 6 weeks consultation period until 5pm 27 June 2024

## **7. Topic Areas**

### **7.1. Housing**

- 38 sites put forward, reduced to 13 after sifting.
- Consultation seeks views on 13 sites
- Western end of district near Westclyst, second choice 1,000 homes (Mosshayne???)

### **7.2. Employment**

- New employment sites inc. Brcl 27a&b (Lodge Trading Estate), 15 new sites, 8 proposed for allocation, mostly extensions to existing employment sites.
- Designated Neighbourhood Areas (DNA)
- New LP must set a “housing requirement figure” for each area for use when preparing a NP.

### **7.3. Local designations**

- Green wedges – protecting the character and setting of settlements and preventing coalescence.
- Coastal Preservation Areas
- CVRP – consultation relates to whether correct boundaries have been drawn.
- All Areas contain potential development allocations – should they be excluded from policy boundaries?

### **7.4. Town centre retail areas**

- at Axminster, Beer, Budleigh, Colyton, Exmouth, Honiton, Ottery, Seaton, Sidmouth.
- Policy to resist loss of shops and encourage new shops/businesses

## 7.5. Sustainability Appraisal

- Assesses policies and sites in draft

## 8. Proposals impacting Broadclyst Parish

One of the most important aspects of producing a Local Plan is allocating sites for new development. The Site Selection Methodology takes all potential sites through a four step process to 'sift' sites.

The Draft Local Plan consultation took place from November 2022 to January 2023 and contained numerous housing (and employment) sites for consultation as either 'preferred', 'second choice', or 'rejected'.

During that consultation, a total of 38 additional housing sites were submitted. Most of the sites were sifted out; however, the site sifting resulted in a total of 13 new sites that had not previously consulted on.

A 'summary' site assessment has been prepared for these sites, with further detailed assessment on landscape, historic environment and ecology to be undertaken following public consultation. Chapter 8 of this report looks at new site proposals pertinent to the parish of Broadclyst.

## 9. Residential: Westclyst Housing (Brcl\_31a)

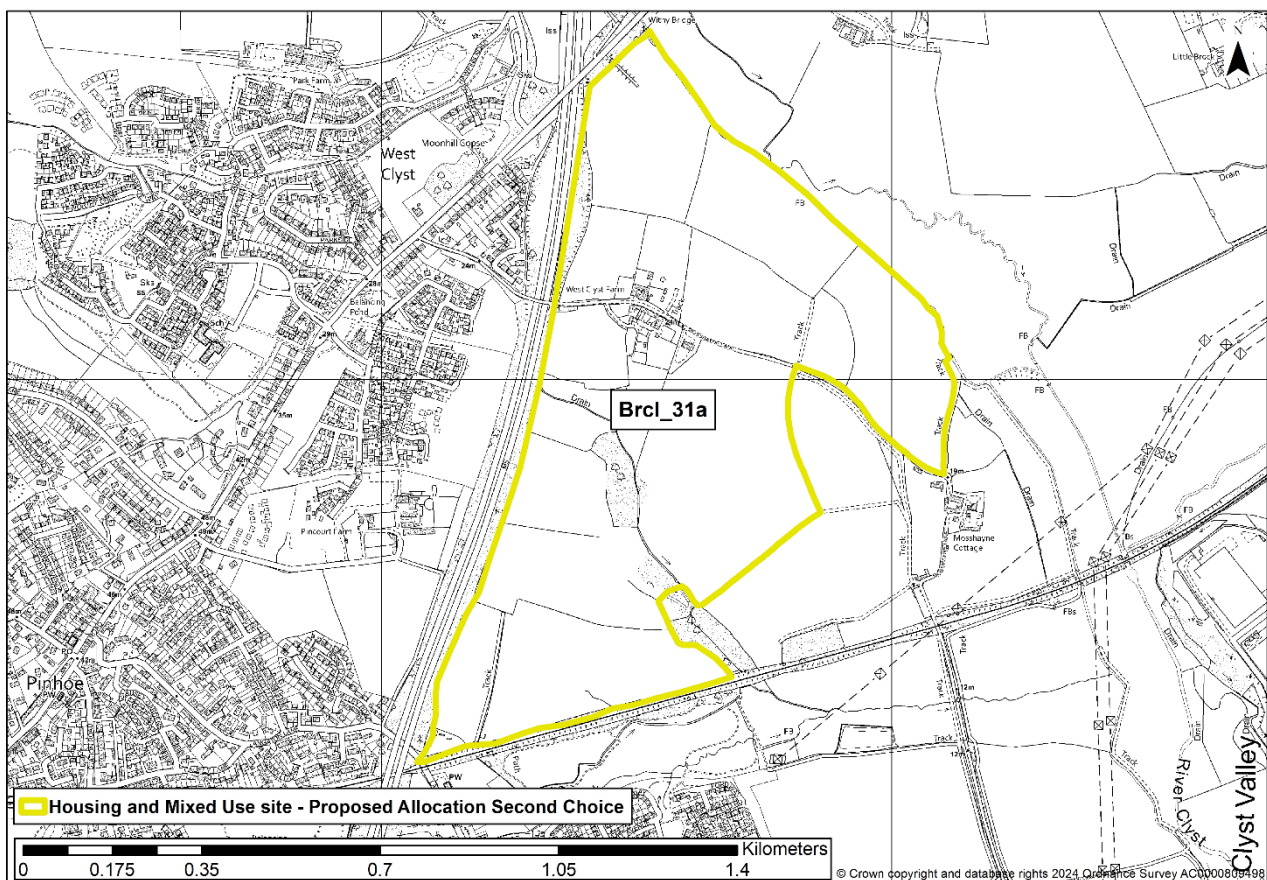


Figure 1: Brcl\_31a Westclyst Farm (EDDC, 2024)

## **SITE ASSESSMENT SUMMARY AND CONCLUSION**

### **9.1.1. Infrastructure**

Full spectrum of facilities expected including Community Hall, GP practice, Primary School, Secondary School, Public Houses, Shops, Post Office & Stores, Open Spaces, and Play Areas.

Clarification is needed regarding the access point off the B3181 at the northern end of the site.

The Barratt Homes / David Wilson Homes Regulation 18 representation states: "The majority of the development would be accessed via a spine road from the B3181, with the smaller residential parcels in the south western part of the site accessed from Langaton Lane.

"It is therefore considered that any concerns from the highway authority can be suitable addressed and mitigated through an alternative access strategy."

However, National Highways owns land that includes a ransom strip to this access point and a representative on their behalf has since told EDDC: "I would like to emphasise that our estate cannot be considered as being available for third party development and alternative access proposals should be explored. National Highways would request this is made clear in any public consultation."

The housebuilder has said they intend to commence discussions with National Highways shortly, with the aim of resolving any issues prior to publication of the Regulation 19 Local Plan.

### **9.1.2. Landscape**

Medium sensitivity - This large site of mainly undeveloped fields has the M5 and the new developments at Pinn Court Farm & Moonhill Copse to the west, the Exeter-Waterloo trainline and the new development at Tithebarn to the south and Exeter Logistics Park & Skypark to the south-east.

### **9.1.3. Historic environment**

Medium sensitivity - There is a Grade II listed building on the site (West Clyst Farm on Mosshayne Lane), but this is already surrounded by a small development and the proposals state that the existing lane would be maintained.

### **9.1.4. Ecology**

Minimal ecological impact provided trees and hedgerows are retained. The site includes an Unconfirmed Wildlife Site (Broadclyst Moor - Dymonds Bridge Marsh) but this could be incorporated into the Clyst Valley Regional Park. Overall, minor adverse effect predicted (not significant).

### **9.1.5. Accessibility**

The site would require its own range of facilities, but it is currently within 1,600m of four or more facilities, including schools, a hall, and a pub.

The nearest primary school is currently Westclyst Community Primary School and nearest secondary school is Clyst Vale Community College. The nearest train station is Pinhoe (approximately 700m from the south-west corner of the site).

#### **9.1.6. Other constraints**

A total of 14.81ha falls within FZ3 (1%) and 20.22ha within FZ2 (0.1%) but these areas fall within the Clyst Valley Regional Park portion of the site.

Agricultural Land - Only a small pocket of the site (in the south-east) was classified in the post-1988 assessment (at Grade 2 and Grade 3b) but the 2002 strategic assessment work found the majority of the site to be Grade 1 (and Grade 3 in the north and along the boundary to the south-east of the site).

Noise issues that would affect the site will likely require mitigation – particularly from the M5 to the west and possibly also from the railway line to the south.

#### **9.1.7. Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?**

No

#### **9.1.8. Opportunities**

North-South trail (part of the Clyst Valley Regional Park Strategy), sports pitches, community facility, natural & semi-natural greenspace for biodiversity enhancements and green with play space.

#### **9.1.9. Yield (number of dwellings)**

Approximately 1,000 dwellings

#### **9.1.10. Contribution to spatial strategy**

Land at Mosshayne Lane is a sustainable location for new development, which would align with the Council's overall spatial strategy.

The site is in close proximity to the extensive facilities and services available in Exeter, as well as other existing infrastructure in the vicinity of the site, including Pinhoe Railway Station to the south west and Exeter Science Park to the south.

The proposed development could facilitate a connection over the railway line, providing a link to these facilities.

#### **9.1.11. Should the site be allocated?**

Second choice (see explanatory note on next page)

#### **9.1.12. Reasons for allocating or not allocating**

The site is being promoted by a national housebuilder who have stated they have the resource and expertise to deliver this development in full.

The proposed development would accommodate approximately 1,000 dwellings, land for educational use and extensive areas of public open space (including a country park), which would collectively represent a sustainable community that could benefit future and existing residents within the western part of East Devon.

NB. Westclyst Farm has been assessed as a 'second choice' site.

In the context of a Local Plan, a "second choice site" refers to a piece of land that is considered

for development if the primary, or first choice, sites are not viable or available. Second choice sites are an essential part of strategic planning in Local Plans, ensuring that local authorities have alternative options to meet development goals and respond to changing circumstances

Key points about second choice sites include:

- **Contingency Planning:** These sites serve as a contingency option. They are not the preferred locations but are identified as potential alternatives.
- **Assessment and Suitability:** Second choice sites are assessed for their suitability and sustainability for development. This assessment includes factors such as environmental impact, accessibility, and alignment with strategic objectives.
- **Priority Order:** These sites are considered only after the first choice sites have been evaluated and deemed unsuitable, unavailable, or insufficient to meet development needs.
- **Planning Flexibility:** Including second choice sites in a Local Plan provides flexibility and ensures that development targets can still be met even if some primary sites cannot be used.
- **Community and Stakeholder Input:** The identification of second choice sites typically involves consultation with stakeholders, including the community, developers, and other interested parties.

## 10.1 Employment Site: Lodge Trading Estate (Brcl\_27a)

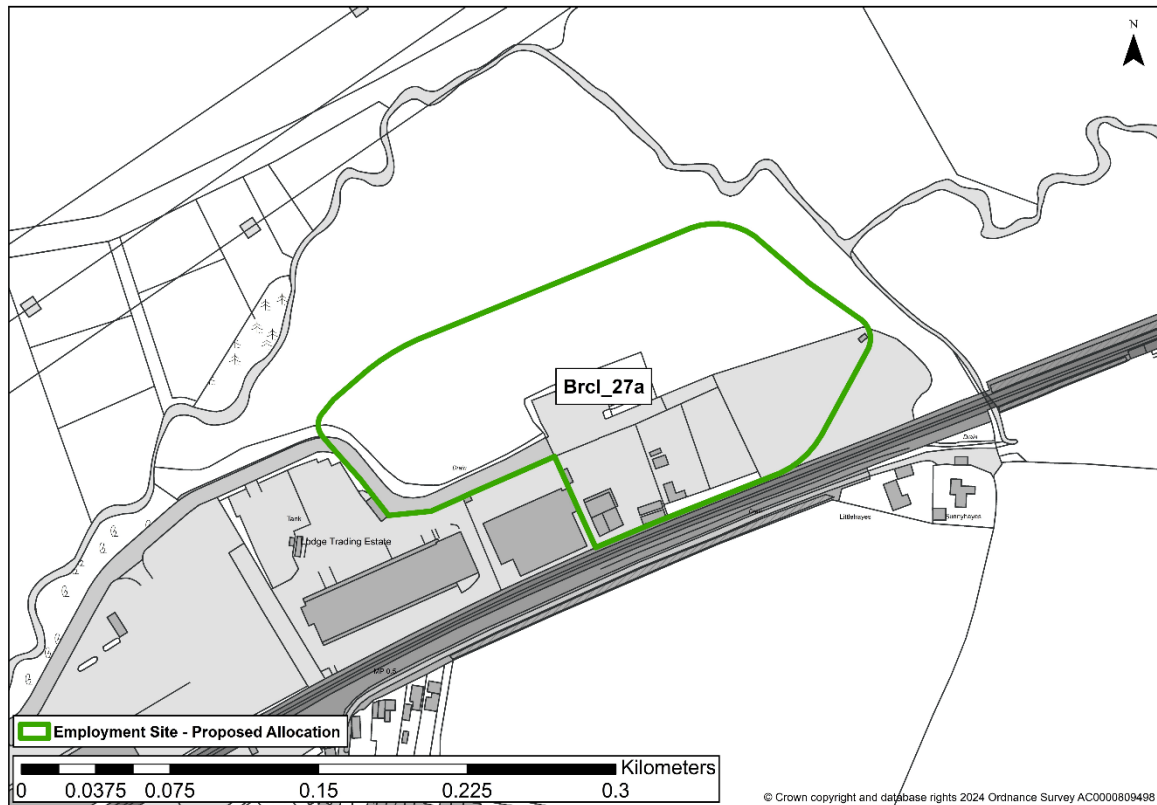


Figure 2: Brcl\_27a: Lodge Trading Estate (EDDC,2024)

### SITE ASSESSMENT SUMMARY AND CONCLUSION

#### 10.1.1. Infrastructure

The site contains an existing business park. Devon County Council advise that careful consideration needs to be given to Broadclyst Station, the Western Expansion Area of Cranbrook, and the associated detail in the emerging Cranbrook Plan.

#### 10.1.2. Landscape

Low-medium sensitivity - The site is not in a designated landscape. It does feature in some medium-long range views and is relatively flat and open, but development would be seen in the context of existing development.

#### 10.1.3. Historic environment

Medium sensitivity - There is evidence of prehistoric enclosure and field boundaries. An archaeological survey is needed prior to development and it may be possible to design a layout to incorporate any subterranean remains.

#### 10.1.4. Ecology

Minor adverse harm predicted (not significant). Site lies immediately adjacent to a unconfirmed wildlife site, priority habitat and nature recovery network. Retention of the boundary hedgerow and careful landscaping could minimise any impact on these areas.



#### **10.1.5. Accessibility**

Site adjoins the outskirts of Cranbrook and lies approximately halfway between the A30 and Broadclyst in a small hamlet. Accessibility is reasonable and the main road is very well used, albeit prone to flooding and narrow in parts. The site is within 1,600 metres of 4 or more different local facilities and within 1,600 metres of a train station or bus route with an hourly or better service.

#### **10.1.6. Other constraints**

Overhead high voltage electricity line with possible easement on a very small part of the northern boundary. No high pressure gas pipeline zones. Site lies adjacent to the Cranny Brook. Approx 4 ha of the total site is in Flood Zone 3. This will impact on the gross development area. An additional 0.9 ha is in Flood Zone 2, Flood zones 2 and 3 are on the northern and eastern boundaries. Area of low risk of surface water flooding in the northern part of the site. Grade 3a and 3b agricultural land.

#### **10.1.7. Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?**

No

#### **10.1.8. Opportunities**

The site is partly developed, partly overgrown. Opportunity to reuse a brownfield site. Poorly related to Cranbrook despite proximity, due to difficulty with bridging the railway line.

#### **10.1.9. Yield (hectares of employment land)**

1.89

#### **10.1.10. Contribution to spatial strategy**

Site is located in the countryside but within walking/cycling distance of Cranbrook and a tier 4 settlement. Includes existing business park.

#### **10.1.11. Should the site be allocated?**

Yes

#### **10.1.12. Reasons for allocating or not allocating**

The site is reasonably well located adjacent to development (and including existing commercial development), close to facilities and public transport. It could function as an expansion to the existing business park. Development could affect subterranean heritage assets. The design would need to protect existing trees and hedgerows and an archaeological assessment would be required.

#### **10.1.13. If whole site is not suitable for allocation, could a smaller part be allocated?**

Yes, 1.89 ha is outside the floodplain and not already in an active employment use.

## 10.2. Employment Site: Lodge Trading Estate (Brcl\_27b)

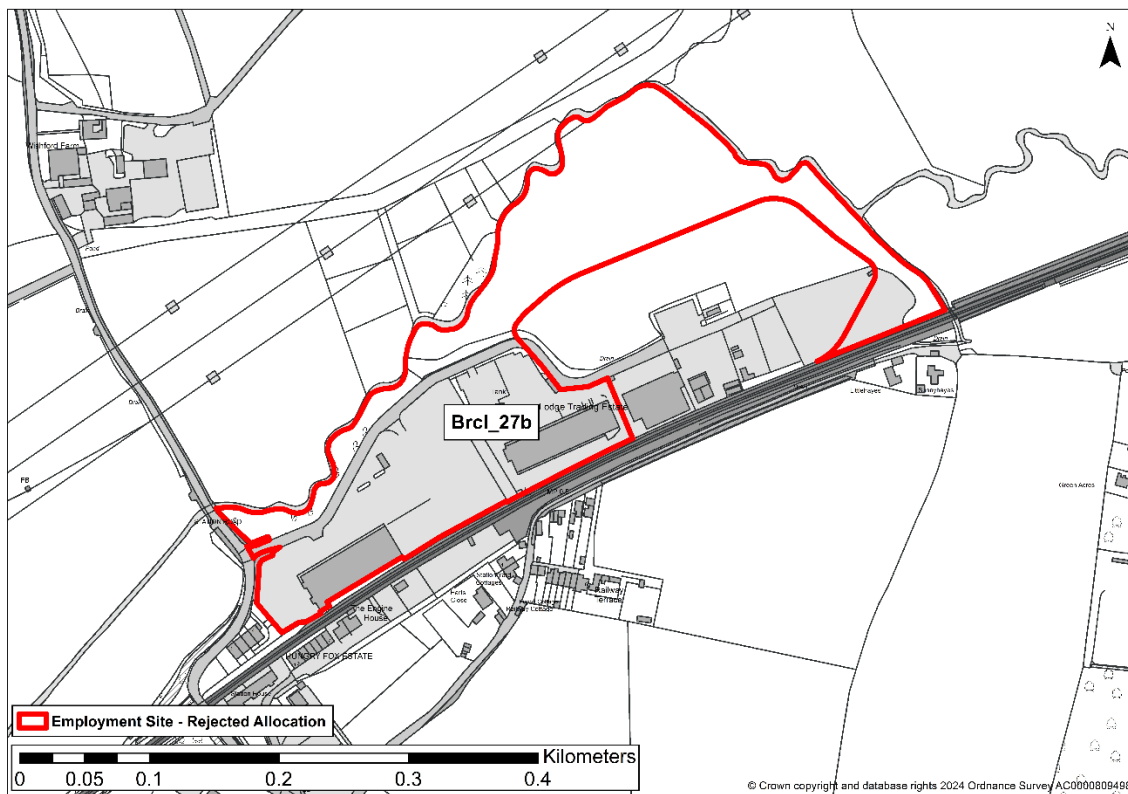


Figure 3: Brcl\_27b: Lodge Trading Estate (EDDC,2024)

### 10.2.1. Infrastructure

The site contains an existing business park. Devon County Council advise that careful consideration needs to be given to Broadclyst Station, the Western Expansion Area of Cranbrook, and the associated detail in the emerging Cranbrook Plan.

### 10.2.2. Landscape

Low-medium sensitivity - The site is not in a designated landscape. It does feature in some medium-long range views and is relatively flat and open, but development would be seen in the context of existing development.

### 10.2.3. Historic environment

Medium sensitivity - There is evidence of prehistoric enclosure and field boundaries. An archaeological survey is needed prior to development and it may be possible to design a layout to incorporate any subterranean remains.

### 10.2.4. Ecology

Minor adverse harm predicted (not significant). Site lies immediately adjacent to a unconfirmed wildlife site, priority habitat and nature recovery network. Retention of the boundary hedgerow and careful landscaping could minimise any impact on these areas.

### 10.2.5. Accessibility

Site adjoins the outskirts of Cranbrook and lies approximately halfway between the A30 and Broadclyst in a small hamlet. Accessibility is reasonable and the main road is very well used, albeit prone to flooding and narrow in parts. The site is within 1,600 metres of 4 or more different

local facilities and within 1,600 metres of a train station or bus route with an hourly or better service.

#### **10.2.6. Other constraints**

Overhead high voltage electricity line with possible easement on a very small part of the northern boundary. No high pressure gas pipeline zones. Site lies adjacent to the Cranny Brook. Approx 4 ha of the total site is in Flood Zone 3. This will impact on the gross development area. An additional 0.9 ha is in Flood Zone 2, Flood zones 2 and 3 are on the northern and eastern boundaries. Area of low risk of surface water flooding in the northern part of the site. Grade 3a and 3b agricultural land. Part of the site is already developed and the areas in active employment use do not need to be allocated.

#### **10.2.7. Within Green Wedge in adopted Local Plan 2013-31 or made Neighbourhood Plan?**

No

#### **10.2.8. Opportunities**

The site is partly developed, partly overgrown. Opportunity to reuse a brownfield site. Poorly related to Cranbrook despite proximity, due to difficulty with bridging the railway line.

#### **10.2.9. Yield (hectares of employment land)**

6.531ha

#### **10.2.10. Contribution to spatial strategy**

Site is located in the countryside but within walking/cycling distance of Cranbrook and a tier 4 settlement. Includes existing business park.

#### **10.2.11. Should the site be allocated?**

No

#### **10.2.12. Reasons for allocating or not allocating**

The site is reasonably well located adjacent to development (and including existing commercial development), close to facilities and public transport. Part of the site is proposed for allocation. Brcl\_27b is not considered suitable for allocation due to the existing active employment uses already in place and the extensive areas that are liable to flooding.

#### **10.2.13. If whole site is not suitable for allocation, could a smaller part be allocated?**

Yes, 1.89 ha of the originally submitted Brcl\_27 site is proposed for allocation as Brcl\_27a. None of this remaining part (Brcl\_27b) of the site is considered suitable for allocation.

## 11. Designated Neighbourhood Area Housing Requirements

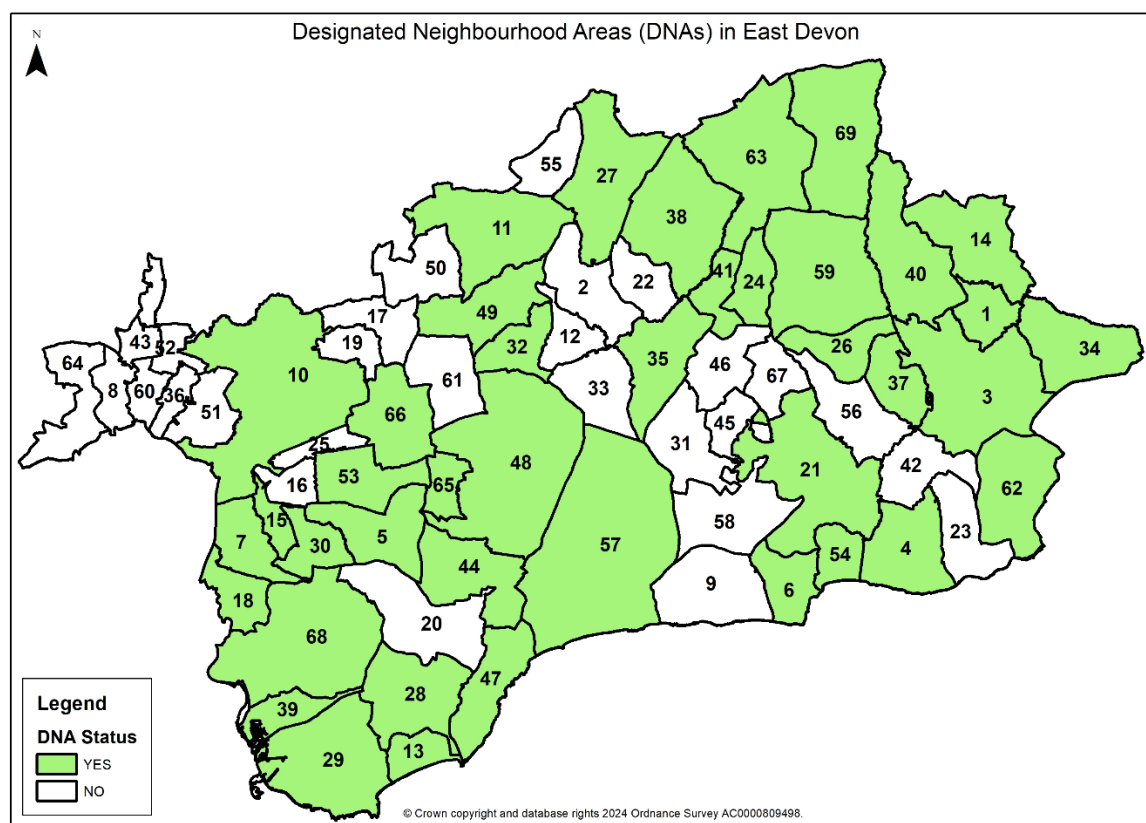


Figure 4: Broadclyst (10) is a Designated Housing Area

### 11.1. Explanation

At the previous consultation stage, we simply stated an intention that the Local Plan policy would set out the housing requirements for Designated Neighbourhood Areas in East Devon 2020-2040 (*or other time period as may be specified*). The Designated Neighbourhood Areas (as existed at the time) were identified by name but the housing requirement figures were not included.

It was stated that these figures would be set following consultation on the methodology to be used for determining them.

Work has now been undertaken to consider the possible options for the method to be used. Two potential method options have been identified as suitable from a wider range of options considered and discounted for various reasons.

Both options are based on sources of housing supply across the Plan period (2020-2040).

Sources of housing supply are:

- Completions (houses built)
- Commitments (houses with planning approval)
- Site allocations (housing on land proposed for residential development in development plan documents (i.e. Local Plan, Cranbrook Plan, Made Neighbourhood Plans))
- Windfall allowance (an allowance for housing on other sites, not yet known, which are referred to as 'windfalls')

The preferred option (Option 1) is for the housing requirement figures to comprise the total number of houses from all sources of housing supply, excluding windfalls.

The currently rejected but potential alternative option (Option 2) would be to also include a windfall allowance in the figures. This would give a more complete picture, but it is not the preferred option as windfall figures are difficult to predict with certainty.

#### **11.2. Broadclyst Allocations**

- Emerging Local Plan allocations<sup>1</sup> 175
- Adopted Cranbrook Plan allocations<sup>2</sup> 90
- Neighbourhood Plan allocations 44
- Completions<sup>3</sup> (01.04.2020-31.03.2023) 777
- Commitments<sup>4</sup> at 31.03.2023 = 1,261
- Total DNA minimum housing Requirement figure (Option 1 – excluding windfall<sup>5</sup>) 2,347
- Windfall allowance 73
- Total DNA minimum housing Requirement figure (Option 2 – including windfall<sup>6</sup>) 2,420

### **12. Clyst Valley Regional Park**

EDDC consulted on a draft local plan from November 2022 to January 2023 that referred to the Clyst Valley Regional Park.

At that stage, it included suggested policy wording and showed the boundary of the existing park. It also referred to the potential for Clyst Valley Regional Park expansion.

In this consultation they now set out a proposed substantial expansion of the park, with a limited number of areas being removed from the existing park boundary.

A small number of sites within the current park boundaries are being promoted for development and these are still being assessed. The boundaries of the park may vary to exclude these areas in the event that it is proposed to allocate these areas for development.

The creation of a new Community Boundary, which is of notable interest to Broadclyst Parish, would be the proposed gypsy & traveller site off of Langaton Lane.

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<sup>1</sup> 'preferred' and 'second choice' sites in the December 2022 Regulation 18 draft of the emerging Local Plan; no decisions on sites have yet been made.

<sup>2</sup> Refers to allocations in the Bluehayes expansion zone under Cranbrook Plan policy CB2

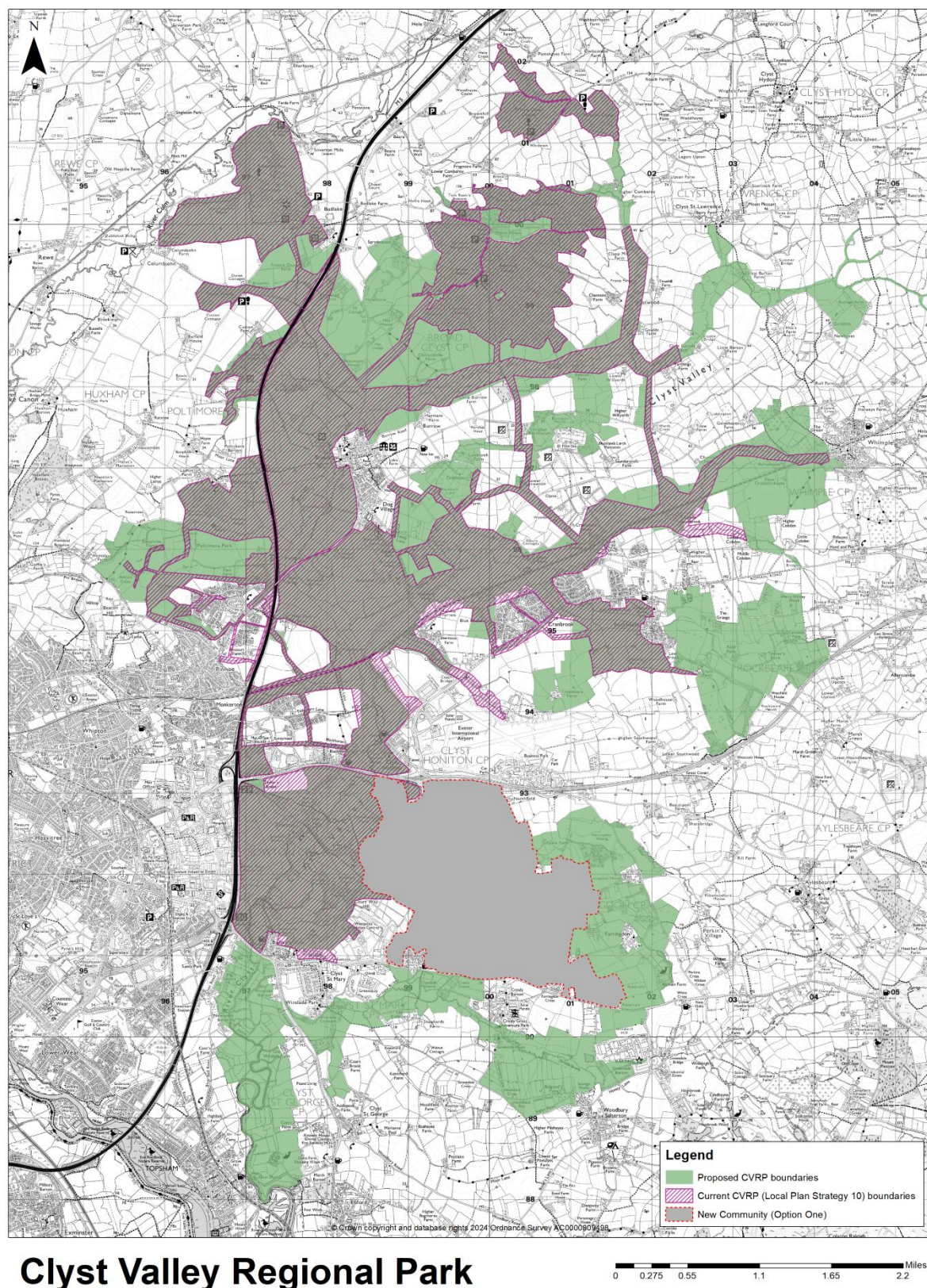
<sup>3</sup> Houses completed on sites before 01/04/2020 are not included in the figures as they fall outside the Plan Period of the emerging Local Plan (2020-2040).

<sup>4</sup> Housing completions or commitments with planning permission since 01/04/23 are not yet included in the figures.

<sup>5</sup> Preferred option

<sup>6</sup> Alternative option







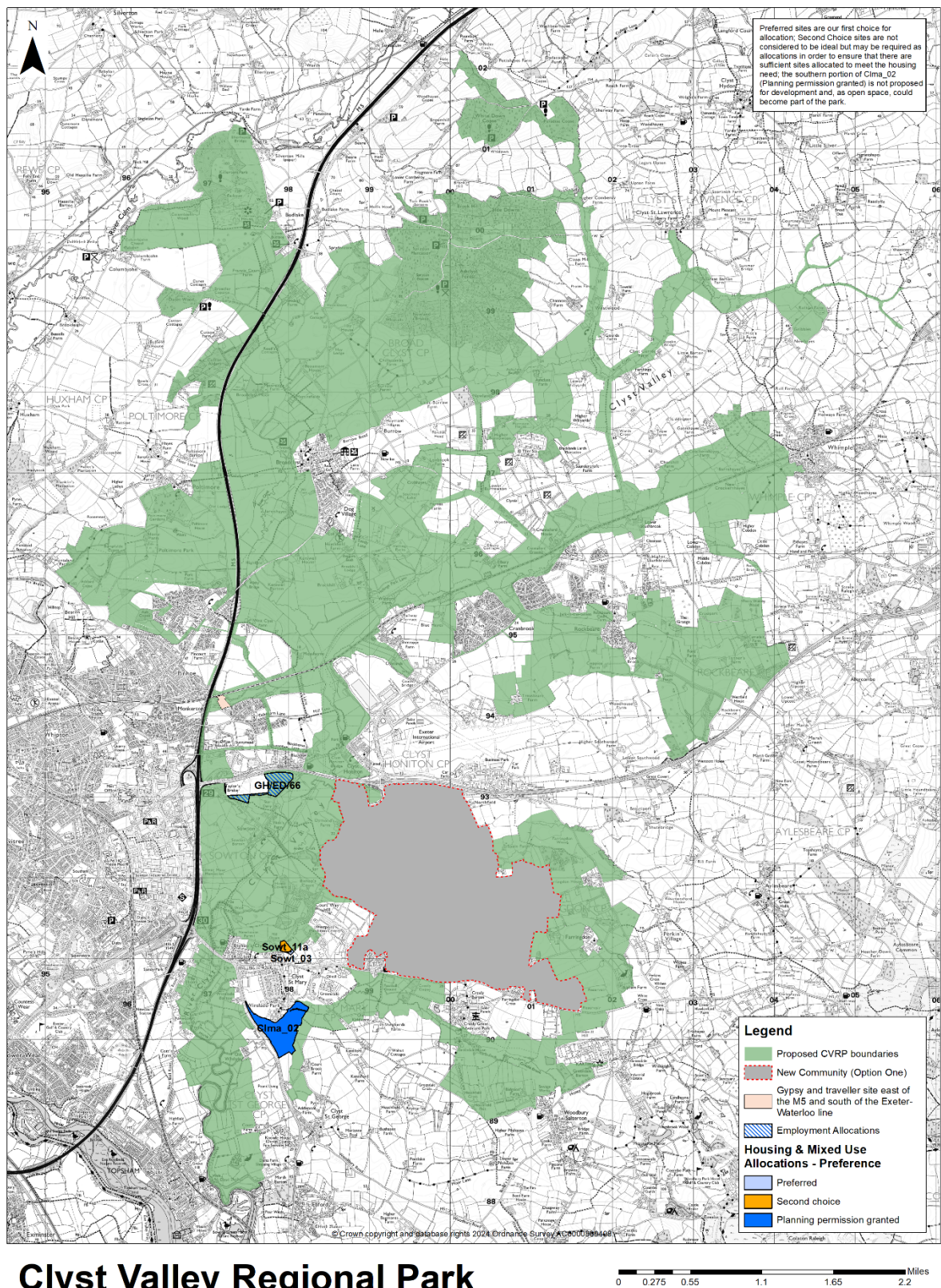


Figure 6: Map of the proposed CVRP boundaries for consultation (green) – with the proposed new community boundary, gypsy & traveller site, employment allocation and housing & mixed use site allocations (see legend)

### 13. Green Wedges

EDDC suggested possible policy and indicated potential proposed boundary lines on maps. These are now being consulted on further, with revised proposed:

- Policy Wording, and
- Green Wedge Boundaries

The idea behind Green Wedges is that they identify areas between settlements (typically towns and villages) that help define and establish the individual character and separation of those settlements.

The concern is that if these 'gaps' start to be filled-in with built development or, more starkly, are completely filled-in with development, it could result in nearby (but separate) settlements progressively or completely merging into a single built-up mass and losing their separate identities.

The Green Wedge boundaries are drawn to fill the most obvious and direct gaps between settlements, typically the closest parts. They are, however, also drawn to wrap around some edges of settlements (especially town edges) in recognition that coalescence could ultimately occur through the creeping of development, or one-off big developments, that occur around outer Green Wedge edges, rather than just through their centre or core.

#### 13.1. Policy Wording

EDDC have drafted policy wording for the Green Wedges, as set out below and welcome views as to whether the policy wording is appropriate:

##### **Policy – Green Wedges**

Green Wedges are defined on the Policies Map and are identified as areas between settlements where constraints on development are essential to prevent physical or visual coalescence and/or maintaining the character and identity of those settlements or a sense of intrinsic separation.

Development will not be permitted in defined areas if that development would create in its own right or add to existing sporadic or isolated development or damage the individual identity of a settlement or could lead to, encourage or start to lead to actual or potential for settlement coalescence.

*Figure 7: Proposed policy wording for Green Wedges*

#### 13.2. Green Wedge Boundaries

The maps that follow show the areas of land that are proposed to be designated as Green Wedges.

These are areas that are identified as important in terms of separating settlements that are close together.

It is considered that inappropriate (non-policy compliant) development in these areas would lead to the settlements either merging, moving in this direction or there being a perception of moving towards merging together and thus losing their distinctive separate identities.

There is therefore a restrictive policy approach, as reinforced by other restrictive policies in the local plan, in respect of what may be built in these areas.



Included are maps on the proposed Green Wedges in the remainder of this report and views are welcomed on whether you think boundaries are shown appropriately.

**13.2.1. Are different boundaries more appropriate? Please highlight where they should go and why.**

The main purpose of the Green Wedges is to protect the undeveloped land between settlements to stop them merging and to protect their separate characters.

However, a green wedge designation is not designed to prevent all development from taking place and some may still be necessary to meet local housing and employment needs.

There are some potential development sites (as set out in the consultation draft local plan) on the edges of settlements but within the Green Wedges.

These sites have been assessed as potentially being appropriate as they would not in themselves lead to settlement coalescence or threaten the individual identity of settlements, however if these sites are built on this could change the undeveloped character of the area.

**13.2.2. Should sites proposed for new housing or employment development be included in the Green Wedges (would the development be appropriate inside a Green Wedge?) or should the Green Wedges be redrawn to exclude them?**

The sites that would have a direct impact on Broadclyst Parish do not currently have potential development sites included as part of the proposed Green Wedge neighbouring Westclyst.

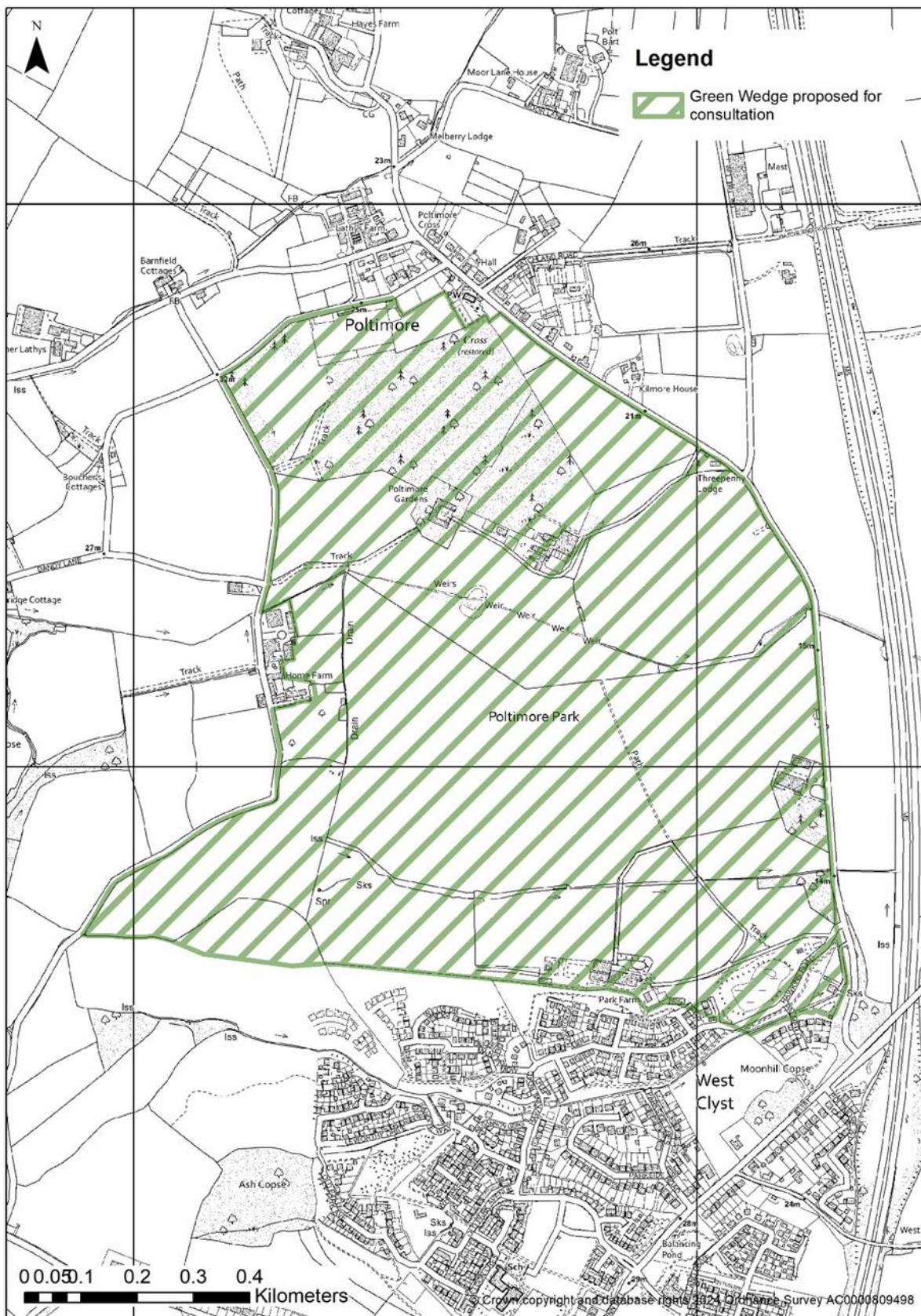


Figure 8: Land between Poltimore and Westclyst.