

CLERKS REPORT FOR 4 NOVEMBER 2024

1. **Bloor Homes dog poo and waste bins.** There have been issues on the Bloor estate at Westclyst with new bins being installed without service contracts. Remediation took some time due to blurred lines of communication. Dog poo bins have been an ongoing frustration across strategic developments with there generally being a lack of appetite for communication and responsibility. The parish council tries to do what it can, but it is not always straightforward and this is harmful to public confidence.

2. **EDDC Local Plan site allocations:**

Much officer time and energy has been taken up by East Devon District Council's new Local Plan, proposals for residential and employment development site allocations across East Devon continue to be considered this autumn by the EDDC Strategic Planning Committee. There is a shortfall in numbers, so the Committee is revisiting sites that were moved on from in the first round. One such site was the site at Winter Gardens, known as Brcly_12a and 12b. Original EDDC officer reports stated that 70 dwellings was the maximum that should be allocated "as any larger development would be on too great a scale for a settlement the size of Broadclyst." However, despite representation from the council (appended), 100 dwellings were allocated.

This is not only going to be of concern for residents due to the pressure it will inevitably put on local services and infrastructure, but is extremely frustrating for us as officers. The time spent has a cost, both in monetary terms and in missed work, and a considerable time is spent researching planning history, analysing proposals, and evaluating how proposals sit within the framework of different planning legislation and guidance notes before an officer can write a balanced argument that is based on policy, local knowledge, mitigations, and other facts, rather than emotional and other bias. It makes a mockery of consulting local views; we do not put forward NIMBY representations like some I have heard during the Local Plan process, yet are still ignored and 40% more dwellings than the number stated acceptable by the Planning Authority's own officers end up being allocated.

As a parish council, we have demonstrated our commitment to delivering sustainable development across our parish, being one of the few parishes to allocate housing in its Neighbourhood Plan. The Localism Act 2011 encourages a 'bottom-up' process that would allow communities to shape their future development patterns, to allocate organic development in a way that local people would support, or a type and tenure that had identified local need, and in place that local people felt would sustain development. The Localism Act and all that it stands for seems to be the baby that East Devon has thrown out with its dirty bathwater as it struggles to allocate sufficient housing numbers to prevent central government allocating even more. When we have tried so hard, days like this really do make me wonder why we bother.

Local Plan allocations still have to be brought forward through the normal planning processes, so we will no doubt see a flurry of activity over the next couple of years as we get to grips with working with a new set of developers. These processes give the community another chance to shape development, so do engage with us and the planning process to have your say (one might almost be forgiven for adding "for what it's worth", but perhaps not).

Recordings of the meetings can be viewed on EDDCs YouTube channel and a copy of all representations are appended to this report.

3. Food Bank

- 3.1. We are exploring grants but without success so far. Gemma has done some good work on this and continues to look for opportunities.
- 3.2. The EHO report has been received and a 5 star rating confirmed.
<https://ratings.food.gov.uk/business/1688721/broadclyst-food-bank>
- 3.3. We are worried as we head towards the winter that people are not going to come forward as they will think there are households in greater need. This is not the case, so please do get in touch with us on support@broadclyst.org or via 01392 360269.
- 3.4. East Devon District Council offers a range of support and advice, please see their website <https://eastdevon.gov.uk/benefits-and-support/financial-support-and-advice/>, call 01404 515616 for switchboard, or 01395 517446 for benefits and financial support.

This concludes a rather short report due to the amount of time taken up by strategic planning matters.

Angie Hurren BEM
BA(Hons): Community Governance
Fellow SLCC
Broadclyst Parish Council Clerk

30.10.2024

NB: please note I have switched to new working hours for the winter which see the contracted 37hrs delivered flexibly in this pattern: Mon-Thurs 07:30-15:00hrs; 18:00-20:00hrs.

Please note that I do not work for the council on Fridays; however, I am contactable for emergencies only via my colleagues in the office.

I speak to the proposed allocation of the Gypsy and Traveller site at Langaton Lane in the East Devon Local Plan. While it is crucial to provide suitable accommodation for all communities, including the Gypsy and Traveller population, this site raises significant concerns that should prompt us to reconsider its viability.

The site at Langaton Lane has already been noted for its proximity to both the M5 motorway and the Exeter to London Waterloo railway line, both of which contribute to considerable noise pollution. In the 2019 officer's report for 12 dwellings in the adjacent field (planning reference 19/1950/MFUL), it was acknowledged that the site was deemed unsuitable for residential development due to these very noise levels (Gypsy and Traveller Sit...). Triple glazing and other soundproofing methods were recommended in that application as a means of mitigating the impact for standard housing, but these solutions would not be appropriate for the types of accommodation commonly used by the Gypsy and Traveller community, such as caravans or mobile homes. These homes simply cannot accommodate the same level of soundproofing as permanent structures, making this location even less suitable for this particular group.

Moreover, the report highlights concerns around the infrastructure of Langaton Lane itself. It is described as a narrow, rural road with no through access, and one that may require upgrades to accommodate further development. This lack of accessibility could place an undue burden on residents and limit their ability to access essential services and facilities. Although it is acknowledged that the site is in proximity to major transport links, the direct accessibility remains a challenge, particularly for a community that may already face barriers to accessing services.

In terms of equality, it is important to emphasize that the courts have designated Gypsies and Travellers as a protected race under law. This legal status affords them special protections under the Equalities Act, which compels us to ensure that they are treated fairly and equally. It is our duty, as policymakers, to ensure that we are not placing them in environments that are detrimental to their well-being. By allocating a site that is deemed unsuitable for typical residential development due to noise and access issues, we risk treating this community unequally. They deserve the same standards of living and protection as any other group in our district. We cannot, in good conscience, designate a location that would expose them to such challenges.

It is also important to remember that this community has a rich cultural history, and while this site has been suggested partly due to its historic significance as a stopping place for Gypsies and Travellers, we must balance this with the need to ensure that their living conditions meet modern standards of habitability. A significant area of the site is located on land that is liable to flooding, further raising questions about whether this location is truly suitable for sustained accommodation.

In conclusion, while the proposed site at Langaton Lane may have historical significance, the practical challenges it presents—noise pollution, inadequate infrastructure, and risks of flooding—make it unsuitable for the Gypsy and Traveller community. As a protected race, Gypsies and Travellers are entitled to the same rights and considerations as any other group under the Equalities Act. Our responsibility is to ensure that we provide safe, healthy, and dignified living conditions for all residents, including this vulnerable minority group. I urge the committee to reconsider this allocation and to seek alternative sites that better meet the needs of the Gypsy and Traveller community. Thank you.

While development is necessary to meet housing needs, we must ensure that every new project aligns with the principles of sustainable development. This allocation, however, falls short on several critical aspects. It relies too heavily on existing infrastructure, lacks the provision of new public services, and falls short of addressing access and transport concerns, especially as outlined in the Pinhoe Area Access Strategy.

First, let's consider the principle of sustainable development. For any community to thrive, it must have access to adequate infrastructure and essential services such as schools, healthcare, public transport, and green spaces. This development, which proposes around 1,000 new homes, fails to deliver on these necessities. Instead of creating a self-sustaining community, it relies on the assumption that existing services in Pinhoe and surrounding areas can absorb the increased demand.

The Pinhoe Area Access Strategy clearly outlines the challenges that already exist in the area, particularly in terms of traffic congestion and access issues. Adding 1,000 new homes to this region, without proper infrastructure improvements, will exacerbate these problems. The proposed development suggests that access can be resolved through a spine road from the B3181 and connections to Langaton Lane. However, Langaton Lane has been stopped up, and the plan does not provide detailed solutions to address the expected increase in traffic or the strain on existing transport networks.

Moreover, the allocation makes no meaningful contributions to new public services, such as additional healthcare facilities, schools, or community spaces, which are at capacity locally and are critical for sustainable living. The plan acknowledges the need for a new primary school and further secondary school capacity, but there is no concrete commitment to deliver these services alongside the new housing. This leaves future residents dependent on already stretched resources. Sustainable development requires more than housing; it requires comprehensive planning that integrates services for the long-term benefit of the community. In this case, the balance is heavily skewed toward increasing housing numbers without the necessary supporting infrastructure.

The Pinhoe Area Access Strategy and Exeter LCWIP emphasises the importance of improving transport connectivity and managing traffic flows. Yet, the proposed development offers little in terms of sustainable transport solutions. While proximity to Pinhoe Railway Station is mentioned, no new public transport options or improvements to local roads are included in the proposal. The existing road network, particularly the B3181, is already experiencing congestion, and without significant upgrades or alternatives, this development would only make matters worse. Furthermore, National Highways has raised concerns regarding access through their land, which remains unresolved, and with the stopping up of Langaton Lane, access from the west is unlikely to now be possible, leaving the likelihood of securing deliverable access to the site in serious doubt.

The environmental concerns cannot be ignored either. The site includes parts of the Clyst Valley Regional Park and areas prone to flooding. These are sensitive environmental zones that require careful planning and mitigation, yet the proposed development does not address these risks adequately. Sustainable development should not only meet housing needs but also protect and enhance our natural surroundings. This plan falls short in that regard, with minimal ecological impact mitigation and no significant green infrastructure provisions.

In conclusion, this allocation fails to meet the standards of sustainable development. It relies heavily on existing infrastructure, offers no new public services, and critically, does not address the transport and access challenges highlighted in the Pinhoe Area Access Strategy. Instead of creating a vibrant, self-sustaining community, this proposal would put additional strain on already overstretched services and infrastructure, further compromising the quality of life for both new and existing residents.

This allocation does not prioritise sustainability, provide new comprehensive infrastructure, or meet the long-term needs of the Westclyst area.

Thank you.

Supporting Allocation, noting Highway and Access Concerns

Ladies and gentlemen,

The Broadclyst Neighbourhood Plan offers broad support for this allocation, recognising the benefits that local employment opportunities can bring to our community. While the community welcomes redevelopment and the associated benefits, we must acknowledge that traffic impact will be a significant concern. There are concerns that any increase in vehicle movements, particularly from large vehicles, will exacerbate the current issues on Station Road, which have long been a source of frustration for residents and commuters alike.

Station Road has experienced congestion for many years, an issue that has intensified. Traffic surveys conducted by Devon County Council (DCC) in both March 2013 and February 2018 confirm that traffic volumes have risen significantly, placing increasing strain on the area. The data makes it clear that any development that adds to this burden must be carefully considered.

One of the more pressing concerns is the parking situation on either side of the railway bridge, particularly from the southern approach. This creates a lengthy single-track road where passing is difficult, especially for larger vehicles such as LGVs. While cars and smaller vans can navigate the bridge and northern approach, larger vehicles face considerable challenges. The result is frequent congestion, particularly at peak times when commuters, school buses, and other school-generated traffic increase the strain on this already limited access route.

Station Road's increasing congestion has become something of a local issue, known all too well by those who use it. It is also recognised by DCC that there are no easy solutions when it comes to improving the situation. The Broadclyst Neighbourhood Plan has made efforts to address this, particularly concerning the southern junction with the old A30. The commitment to explore alternatives and solutions through Cranbrook delivery partners is encouraging, however, it is clear that any future development must address these issues comprehensively.

Until such time that improvements are made, it would be prudent to minimise any additional LGV movements on Station Road, with B1 and B2 uses prioritised over B8 for this site.

Conclusion

In conclusion, while economic development is welcomed to bring local employment opportunities, we must be mindful of the impact on traffic and congestion. The Council has repeatedly voiced concerns about B8 use at Lodge Trading estate, and any additional LGV movements will further strain Station Road and the railway bridge.

We urge that we continue to explore alternatives and solutions that prioritize the safety and accessibility of our roads while promoting sustainable development in our community.

Dear Committee,

I speak to raise concerns regarding the potential allocation of sites Brcl_04 and Polt_07, particularly in relation to its impact on Poltimore House and the surrounding parkland. Poltimore House, a Grade II* listed building, holds significant heritage value, and the landscape surrounding it contributes to its historical and cultural importance. The development of site Polt_07 could have high adverse effects on the visual setting of this important heritage asset. The site assessment also acknowledges the site's medium-high landscape sensitivity and the moderate adverse ecological impacts due to its proximity to wildlife sites. Additionally, this site lies within the Green Wedge and Clyst Valley Regional Park, a valuable landscape for biodiversity, recreation, and community enjoyment.

The site is not recommended for allocation. However, if the committee is inclined to consider the allocation of this site, there are pathways to minimise and mitigate these impacts through sustainable development and new infrastructure. If the site were to be developed, several key strategies should be implemented:

1. **Heritage and Landscape Sensitivity:** The design of any development on this site must carefully respect the views and setting of Poltimore House and its parkland. Buffer zones, green spaces, and sensitive landscaping could shield the development from critical viewpoints, reducing its visual impact on the house and its surroundings. Any design should complement the character of the Clyst Valley Regional Park to ensure that the green, open character is retained as much as possible.
2. **Ecological Protection and Enhancement:** A comprehensive ecological mitigation plan should be developed to address the potential adverse effects on the local environment. The proximity to the Clyst Valley Regional Park and its associated wildlife corridors highlights the need for a strategy that preserves and enhances biodiversity. The integration of green infrastructure, retention of wildlife habitats, and the use of native planting would be essential. The development should also contribute to the long-term vision for the **Clyst Valley Regional Trail**, which seeks to provide enhanced opportunities for recreation and sustainable transport in harmony with nature.
3. **Sustainable Infrastructure and Transport:** Any development of the site should be closely aligned with sustainable transport objectives, including the **Exeter Local Cycling and Walking Infrastructure Plan (LCWIP)**. This strategic plan aims to promote active travel, and the development of Polt_07 should integrate well-planned cycling and pedestrian routes to connect with the wider area, including the Clyst Valley Regional Trail. These routes would encourage sustainable travel, reduce car dependency, and integrate the development into the fabric of the community and surrounding green spaces.
4. **Flood Risk and Resilience:** Parts of the site fall within Flood Zone 3, necessitating a well-considered approach to flood risk management. Sustainable drainage systems (SuDS) and other flood resilience measures should be incorporated to manage surface water sustainably and protect both new residents and surrounding land from flood risk.
5. **Community Integration and Local Services:** As the development would bring new residents to the area, it is essential that it supports and enhances existing community infrastructure, such as schools and healthcare. The proximity to the Clyst Valley Regional Park offers opportunities to create an integrated green community with access

to nature, open spaces, and recreational facilities, fostering well-being and community spirit. Also much needed at Westclyst is a community hub, which this development could offer.

To summarise, while the impact on the heritage setting of Poltimore House and the landscape are significant concerns, should the committee be mindful to allocate, the site offers opportunities for well-planned, sustainable development. This could contribute to both housing needs and the enhancement of local green infrastructure, if approached with care, sensitivity, and in alignment with the **Exeter LCWIP** and the vision for the **Clyst Valley Regional Park and Trail**. The decision for this site should be made with careful consideration of the need to balance sustainable development with the protection and enhancement of East Devon's cultural, natural, and recreational assets.

Chair, councillors, and members of the East Devon District Council,

Thank you for the opportunity to speak today.

Broadclyst is a Tier 3 settlement in the East Devon District Council (EDDC) Local Plan. As a Local Centre, Broadclyst is intended to meet the needs of the local and the surrounding areas. As we consider the allocation of sites for the forthcoming Local Plan, it is vital to prioritise sustainable development that strengthens our communities without creating dormitory villages along the eastern edge of Exeter. Broadclyst Parish Council firmly believes that development must provide not just housing, but also local employment opportunities to prevent unsustainable out-commuting.

The National Planning Policy Framework (NPPF) makes clear in Paragraph 8 the importance of achieving sustainable development by balancing economic, social, and environmental objectives. This principle is particularly relevant here, as we seek to ensure that new development does not create unsustainable dormitory villages, where residents are forced to commute long distances for work. Instead, it is essential that we integrate employment opportunities alongside housing.

Broadclyst Parish Council's Neighbourhood Plan broadly supports balanced and sustainable development. The priorities in the East Devon Economic Development Strategy 2024–2029 echo objectives in the Neighbourhood Plan, stressing the importance of building self-contained communities where people can live and work locally, thus reducing the reliance on car-based commuting.

Recent discussions in the All-Party Parliamentary Group (APPG) for Rural Services further highlight the importance of prioritising rural development to ensure that smaller communities do not miss out on essential infrastructure and economic opportunities. This APPG has underlined the need for investment in rural areas to make them more self-sustaining, a theme that mirrors East Devon's goal of reducing out-commuting and fostering employment close to home. Furthermore, the APPG discussions emphasise that local authorities must focus on ensuring rural areas have access to the same economic and social opportunities as urban areas.

By ensuring that sites such as Brcl_12a and Brcl_29 include employment space for B1 and B2 uses, we can provide local jobs, support the rural economy, and reduce congestion and emissions, all while maintaining the vibrancy of Broadclyst.

However, the impact of any new development must be mitigated, and as this committee will hear from our residents who have come to speak today, site 12a and 29 are not without challenges to delivery. I will leave it to them to detail such challenges, and instead ask that should this committee be mindful to allocate these two sites, that any future applications do not just deliver on-site mitigations, but by working with Devon County Council Highways, South West Water, and Broadclyst Parish Council, they address wider identified issues associated with vehicle and pedestrian access, sewerage, and other essential infrastructure.

As the impact of development begins from the moment of commencement, we ask that the council consider the use of Grampian conditions to ensure that necessary works to the highway and sewerage systems are completed prior to occupation, accompanied by a robust CEMP that reflects the site's residential setting for the duration of all construction phases.

Again, should this committee be mindful to allocate, we ask that sufficient contributions are secured to support our local services that are already at capacity, including healthcare and education provision.

Failure to follow this approach risks turning Broadclyst and other nearby villages into dormitory settlements, where residents must commute into Exeter for employment. This is neither environmentally sustainable nor supportive of the district's long-term economic resilience, as highlighted in both the NPPF and the East Devon Economic Development Strategy. It also risks putting further pressure on our already inadequate infrastructure and overstretched services; no development should take place without deliverable improvements being in place.

In summary, while we are sympathetic to the top-down pressure being put on Local Planning Authorities, we should not be allocating sites unless truly sustainable development can be achieved and the resulting impact on infrastructure and services can be fully mitigated. We recognise East Devon's ambition to achieve Net Zero by 2040; reducing commuting emissions and creating local job opportunities align with the district's environmental goals.

We urge the Council to ensure its allocations ensure Broadclyst remains a thriving, sustainable community, a vibrant tier three settlement that contributes to the broader success of East Devon while addressing the urgent need for rural resilience.

Thank you.

Dear Mr Chairman and Members of the East Devon District Council Strategic Planning Committee,

Thank you for allowing me to present my concerns regarding Brcly_12 and Brcly_29. I'd like to cover two key points: access to Brcly_29 and the proposed allocation increase at Brcly_12.

Firstly, access to Brcly_29 is better suited via site 12a rather than Green Tree Lane. The existing bell-mouth access is problematic due to level differences, complicating what can be a chaotic junction. However, a pedestrian and cycle route through the south-western corner would be ideal, linking residents to essential amenities and bus routes.

Secondly, regarding Brcly_12: increasing the allocation from 70 to 100 dwellings deviates from the officer's original recommendation, which found 70 to be the upper limit for Broadclyst's scale. I quote from the Officer's report - "any larger development would be on too great a scale for a settlement the size of Broadclyst."

The Masterplan now proposes a 40% increase in dwellings with minimal additional infrastructure. This shift threatens to overburden local infrastructure and services, undermining quality of life and failing the sustainable growth principles in the East Devon Local Plan and NPPF. Broadclyst's unique landscape and ecological importance make it vital to maintain a lower, manageable density.

The Masterplan and new report show over 40% more dwellings than originally recommended spread over a larger area, with a slightly increased employment land allocation of 0.6ha. Whilst more employment land and the provision of self-built plots - a need identified in the Broadclyst Neighbourhood Plan - is welcomed, the 40% increase of dwellings is of high concern.

The current East Devon Local Plan emphasises the importance of sustainable growth, aligning with the NPPF, which advises that development must be appropriate in scale, character, and appearance for its surroundings. Such a leap in scale is inconsistent with principles of 'proportionate development' and contradicts the earlier recommendation, which recognized that a development of more than 70 dwellings would be excessive for a village of Broadclyst's size.

Moreover, increasing to 100 dwellings risks compromising the objectives set out in our Neighbourhood Plans, which were designed to guide balanced growth. The larger scale proposed fails to respect the established vision for Broadclyst's future, and risks creating an unsustainable precedent for future allocations.

Should the committee be mindful to allocate, we request:

- Separate access to the employment area so that works-related traffic does not pass through residential areas
- Connecting foot/cycle links to the village to prevent residents needing to walk along Whimble Road
- Improvements to the existing footpath
- Strong local connection required for affordable units
- Protection of land allocated for self-build plots to meet local demand.

In conclusion, I respectfully urge the committee to uphold the original recommendation of 70 dwellings to ensure any development remains proportionate, sustainable, and aligned with the community's long-term well-being. Thank you.