## 1. Development outside of agreed boundaries

The Design and Access Statements submitted in this planning application show three additional areas of development that sit outside the development boundaries of:

- a) The Local Plan that was agreed in May 2014.
- b) The Development Framework Plan that was agreed in June 2018.
- c) The Local Plan Review of 2018.

The three areas referred to are:

- Surrounding Oaklands, to the south of the A383. This area is in any case known to flood extensively having several tributaries to the River Lemon flowing through it. It is outside of the Local Plan probably for this very reason, and it should remain so. Even with extensive and clever drainage plans that are yet to be submitted, any development allowed here will eventually impinge financially on the Council from emergency housing, flood defence and repair at some point in the future.
- 2) West of Seale-Hayne, to the north of the Seale-Hayne Farm drive, at the rear of the old farm buildings.
- 3) Between Perry Lane and Howton Road.

The Houghton Barton (NA1) area was discussed at length in the consultation phase for the design of the Local Plan and then again at the Government inspector's Enquiry. It was agreed and adopted by Teignbridge Council on 6<sup>th</sup> May 2014.

In the Local Plan Review 2020-40 - Part 1, Teignbridge planners have already answered the question as to whether development adjacent to agreed boundaries should be allowed (Q11, p94):

Settlement Boundaries, or **settlement limits**, remain in the draft Local Plan as they are a recognised way of **controlling urban sprawl**. The development that may be permitted within and outside settlement boundaries is set out in Policy SP2: Settlement Limits and the Countryside, which **restricts development outside Settlement Limits**.

Additionally, in a "Statement of Community Involvement" from the developer, it was shown that after a public exhibition for this development, feedback showed that the public preference was for development to come forward on an allocated site **in line** with the Local Plan (Para 4.2).

Hence this application should not be approved with these three areas included as it extends outside the area agreed in the Local Plan. If the application is approved and the extensions are allowed, a precedent will be established for many landowners who own other land adjacent to the area. The urban sprawl mentioned in the Council's response would become very difficult to control.

If the additional areas are removed from this application, it must still be subject to the following condition.

## 2. Reduction in housing supply

This application can only be approved if the Authority is in a position to accept the possible reduction from 1,100 units to 900 units of housing required from the NA1 part of the Local Plan. If this is not acceptable, this application must be deferred until the linked application with additional housing units, "Application B" (20/00586/MAJ) has been decided.

Application B might be refused at a later stage, especially as it has yet to be publicly consulted upon and, as discussed above, feedback showed that the public preference was for development to come forward on an allocated site **in line with the Local Plan**.

If the Authority cannot accept a possible housing supply reduction and wishes to proceed with the NA1 development, it should look to other developers to find a way of supplying the required housing demand within the agreed Local Plan area, since this application does not achieve this.

The applicant's Planning Statements for applications A and B suggest that there is £2.5m available if Application B is approved enabling the required 1,100 units to be built (Para 4.12). If this money was instead put to overcoming the apparent topographical challenges that prevent the building of the number of units required in Application A, it might then be possible to develop as was originally agreed in the Local Plan.