



Exmouth Community Association

To: Exmouth Town Council
East Devon District Council

East Devon Local Plan Review

Please find below Exmouth Community Association's comments on the East Devon Local Plan – Consultation Draft.

General Issues

1. We understand that the current provision for new housing in the Draft Local Plan is based on targets/requirements set out at national/county levels. In the light of the recent government announcement to discontinue setting such targets, we think it would be reasonable for the Council to review actual housing needs at District level for incorporation in the current Draft Local Plan. We do not see a pressing need to adhere to the currently proposed timescale, there is, after all, a Plan already in place until 2031.
2. The approved Exmouth Neighbourhood Plan (ENP) identified priority for the provision of more local employment opportunities and improved infrastructure/public service provision to serve the then planned housing/population increases. We welcomed recognition of this same priority being included in the December Emerging LP report and again in the preamble to the current Review report. Despite this, we are now being asked to consider even more housing allocations without any reference to the provision of much needed infrastructure and public service provision. This, in our view, is totally inappropriate – a clear case of putting the cart before the horse.
3. A prime example of this is the omission of the proposed Dinan Way extension, currently included in the bid for funding under the “Levelling Up” initiative. This extension is needed NOW to remove commercial traffic from having to go through the Town Centre as well as general commuting/commercial traffic using residential roads totally unsuited for such use. There is a strong argument that there should be no more housing allocations until the Dinan Way extension is implemented.
4. The same argument applies to the many other infrastructure/service needs identified in the approved Exmouth Neighbourhood Plan
5. We welcome the allocations of land for future employment provision within Exmouth. However, given the let-out in Policy 54 for exceptional circumstances, strong effective marketing will be necessary if there is to be no repetition of the Tesco/Redgate site fiasco. We question whether the allocations are sufficient to serve Exmouth's needs. A significant daily exodus of Exmothians to work in the vicinity of Exeter, with related congestion on

inadequate roads, continues. We fear this will be exacerbated by the Plan's proposal to concentrate new employment land/opportunities around Exeter. Even more employment opportunities in Exmouth should be the priority.

6. The provisions for the supply of affordable housing is to be welcomed. However, we are concerned that, on the issue of affordable housing, "words" are not always followed by "action". The Plan, Policy 40, opens the door for developers to work the system by claiming it is not viable to meet Plan requirements. The current Goodmores housing development in Exmouth is a typical example where despite planning conditions to provide an element of affordable housing, this was subsequently much reduced on the basis the developer was claiming unviability. This is absolutely outrageous in our view especially if any compensation payments by the developer do not provide for the needs of our town.

7. Confirmation of the need for and importance of safeguarding the special environmental sites and values of our area is welcomed. However, we strongly object to the proposal that areas on the very edge of Exmouth are suitable for solar energy production, especially the Maer Valley which our Neighbourhood Plan earmarks for the creation of a Valley Park.

Specific issues relating to suggested housing allocations

- **Land on the north-eastern side of Exmouth**

We object to all the suggested housing and employment allocations either side of Hulham Road, primarily because of remoteness from the town's services, not least the town centre. More development in this area should certainly be regarded as premature until such time as the planned Dinan Way link to the A376 has been implemented. Without the completion of the Dinan Way to the A376, any development in the Hulham Road area would inevitably result in increased use of the B3179 through residential areas in Woodbury which is totally unacceptable

- **Courtlands Lane (Lympstone 07)**

We object to this allocation on the basis it lies in the Coastal Preservation Area and the "Green Wedge" between Exmouth and Lympstone. Both designations infer a presumption against development.

- **Summer Lane (Lympstone 08)**

Surely this is on the line of the proposed Dinan Way extension and on that basis should be safeguarded against development.

- **East of Littleham (Exmo 17)**

This lies within the Coastal Preservation Area and East Devon AONB and on that basis there is a presumption against its development. However, if its inclusion is considered appropriate, the opportunity should be grasped to provide an extension of Dinan Way to give a more direct access for traffic generated by the Devon Cliffs resort at Sandy Bay, in turn removing this same traffic from the centre of Littleham village.

- **Douglas Gardens (Exmo 06)**

We object to this further intrusion into the Maer Valley, earmarked in the Exmouth NP as a Valley Park. If it is to be considered for inclusion, the owners should be

asked to commit to the creation/safeguarding of a future Maer Valley Park at least providing increased public footpath access between Littleham and the seafront.

Geoff Skinner
Chairman
Exmouth Community Association



6 January 2023