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**East Devon District Council**  
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**Devon**  
**EX14 1EJ**

**13<sup>th</sup> January 2023**

**Submission from the Member of Parliament for East Devon, Simon Jupp MP, to East Devon District Council's Draft Local Plan 2020-2040 consultation**

To whom it may concern,

I am writing as the Member of Parliament for East Devon to express residents' concerns about East Devon District Council's Draft Local Plan.

I am also writing to request that East Devon District Council pause and reconsider their approach considering the Secretary of State's statement in Parliament last month.

Constituents have shared their views with me, and it is my role to represent them as their elected MP.

I have set out these points under the following subheadings:

- The government's changes to the planning system;
- Exmouth and Lympstone;
- New town;
- Sidmouth and Sidford;
- Budleigh Salterton;
- Ottery St Mary;
- Whimble;
- Broadclyst;
- Sidbury; and
- West Hill.

I expand on these subheadings in my submission.



The Conservative government wants decisions about homes to be driven locally. Councils should therefore be working hand-in-glove with the communities they serve to ensure homes are built in the right places with the right infrastructure.

My postbag has been full of complaints about these proposals for where homes should be built.

Many feel that the proposals will not help people stay in their own communities, reduce travel, or keep families close together.

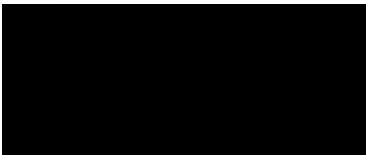
I would warmly encourage East Devon District Council to listen carefully to residents' concerns and work more closely with communities on future plans.

We must build new homes, but they must compliment the area rather than concrete all over it.

East Devon District Council should take this opportunity to go back to the drawing board.

The power is in your hands to make the right calls, thanks to the Conservative government.

Yours faithfully,



**Simon Jupp MP**

Member of Parliament for East Devon



## The government's changes to the planning system

The Secretary of State for Housing, Communities and Local Government, Michael Gove MP, announced further changes to the planning system, alongside the Levelling Up and Regeneration Bill, through the written statement in Parliament HCWS415 made on 6th December 2022.

The written statement affords East Devon District Council some welcome breathing room because the Draft Local Plan consultation was launched before the Secretary of State's announcement.

Councils will be able to calculate housing need as a starting point but ultimately must consider how to protect the characteristics of each area – be that precious countryside, the character of an area, or heritage.

The Secretary of State explained:

“I will retain a method for calculating local housing need figures, but consult on changes. I do believe that the plan-making process for housing has to start with a number. This number should, however, be an advisory starting point, a guide that is not mandatory. It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character or an area, or heritage assets. It will also be up to them to increase the proportion of affordable housing if they wish.”

East Devon District Council will also be aware, through the Levelling Up and Regeneration Bill introduced to Parliament in May 2022, that the government is bringing in an Infrastructure Levy. This will ensure that developers pay their fair share to deliver the infrastructure that communities need.

The new Infrastructure Levy will be set locally by East Devon District Council who will be able to set different Levy rates in different areas. For example, East Devon District Council could set lower rates on brownfield over greenfield to increase the potential for brownfield development.

The Secretary of State is also seeking new powers to introduce 'neighbourhood priorities statements'. These will provide communities with a way to determine priorities for their area and formally input into the local plan.

The government recognises there is no truly objective way to calculate how many homes are needed in an area. Since becoming an MP in 2019, I have repeatedly told Ministers that East Devon's housing figures were the product of fanciful Whitehall algorithms.

Taken in the round, the government's planning reforms will therefore increase and enhance opportunities for involvement, so it is simpler, faster, and easier for communities to engage with local plans.



I urge East Devon District Council to seize this opportunity to listen to residents' concerns about the volume of inappropriate development proposed in the Draft Local Plan.

East Devon District Council should therefore pause and reconsider their approach considering the Secretary of State's statement in Parliament last month.

### **Exmouth and Lympstone | Lymp\_09, Lymp\_10a, Lymp\_14**

Residents in north Exmouth and residents in Lympstone are extremely alarmed by the volume of development that is being proposed. East Devon District Council's Draft Local Plan effectively merges the two historic towns together.

I am continuing to meet with the Northeast Exmouth Residents Group who were formed to effectively voice concerns about the suitability of the above sites. The Group believe the Draft Local Plan overburdens the local area with 258 new homes on top of the 350 homes already planned at Goodmores Farm off Hulham Road and Dinan Way.

The Northeast Exmouth Residents Group say hundreds of new homes will bring more traffic, air pollution, and parking problems. Lymp\_09, Lymp\_10a, Lymp\_14 would be a satellite community without shops and facilities at easy walking distance and three miles from the centre of Exmouth. Concerns have been raised about whether the busy arterial roads linking Exeter and Exmouth can take any more commuter traffic.

### **Exmouth and Lympstone | Exmo\_08 and Exmo\_16**

Residents of Littleham have been in touch with me to express concern about the inclusion of Littleham Fields.

As it stands, this site will accommodate around 44 new homes.

One Littleham resident summarised:

"Access from these sites on to Littleham Road would be extremely dangerous, especially at times of church services, and weddings and funerals, as there is very poor visibility from Elm Lane onto Littleham Road, a road used by many large vehicles going to and from Sandy Bay, and other public service vehicles."

### **Exmouth and Lympstone | LP\_GH/ED/72 and LP\_GH/ED/73**

Residents in Lympstone are concerned about the impact on the cohesion of the village, its services such as the Underhill Surgery, and the A376 by the 177 homes proposed in sites LP\_GH/ED/72 and LP\_GH/ED/73.

The site is within the Coastal Preservation Area and concerns have been raised that run off into the brook by Nutwell Road would carry material into the estuary.



Increased numbers of village children will need to travel to schools outside the village without enough school places being planned for.

These fields are also reportedly used by many species of wildlife, including otters, roe deer and shelducks which move between the Exe Estuary and Woodbury Common.

### **New town | Development of a second new town east of Exeter**

The development of another new town in East Devon should only go ahead with absolute guarantee that the right infrastructure, such as energy supply, and services, such as GP and dental provision, will be in place from day one. Cranbrook is still being built and I'm very concerned about the impact on local infrastructure of another new town. Until Cranbrook is completed, with a proper town centre, it is hard to justify this proposal. For those reasons, I cannot support the proposed development of a second new town east of Exeter and the government is aware of my views.

The far west of the district, stretching from Cranbrook to Clyst St Mary and Exmouth, has been allocated 9,000 new homes which is significantly more than the 2,500 planned for the rest of East Devon.

Of this 9,000 allocated in the far west, Farringdon villagers stand to have a new town of 2,500 homes built a stone's throw away. I am continuing to meet with the Farringdon Residents Association because I want to make sure their voice is heard.

I would warmly encourage East Devon District Council to pay particular attention to their formal written submission because their parish is the most severely impacted by the volume of development proposed in the Draft Local Plan.

I would also like to draw attention to a letter sent to East Devon District Council's Chief Planning Officer on 12<sup>th</sup> January 2023 from a landowner in the proposed new town area, Option 1. The landowner never agreed to their inclusion in the Local Plan. The landowner has no intention of promoting or selling their land and this has caused them much distress.

### **Sidmouth and Sidford | Sidm\_08\_041B, Sidm\_06a, and Sidm\_24**

Sidford Business Park was a proposed 8,445sqm of employment space that could turn agricultural land into offices and distribution firms. As I have said many times publicly, I am firmly against it because of the location, which is inappropriate for the purpose originally put forward.

Planning was approved for that use despite serious opposition from local councillors and residents on its doorstep who believe it will negatively impact on the landscape, local wildlife, and the Area of Outstanding Natural Beauty in which it will sit. It will also increase traffic on an already regularly congested and narrow road.

The site is currently up for sale, and I hope all options for it to be returned to nature are explored.



The views of residents and local councillors must be taken on board should its purchaser try to change the site's use from employment to residential land.

I am also concerned to see the inclusion of land west of Two Bridges Road, Sidm\_06a, for around 30 new homes and the inclusion of Sidm\_24 as an employment site of 1.6 hectares directly to the north of Sidm\_08\_041B because of the same set concerns I have outlined above.

### **Budleigh Salterton | Budl\_06**

Budleigh Salterton Community Hospital, operated by Seachange, is allocated for 20 new homes as a preferred allocation. East Devon District Council's erroneous inclusion of the site in the Draft Local Plan has caused unneeded worry to residents of the town.

This is a real kick in the teeth to Seachange and the Budleigh Salterton League of Friends. I have been working closely with them since being elected to secure the site's long-term future. That future is to serve the health and wellbeing needs of the town. It is not for housing development. It must be taken out of the plan at the earliest opportunity.

### **Ottery St Mary | Otry\_01b, Otry\_10, Otry\_09**

I am acutely aware of pressures on local services and infrastructure in Ottery St Mary. The town has seen significant development in recent years. Any plans for further development in the town must take these existing pressures into account so the Coleridge Medical Centre and school places can keep up with demand.

### **Whimble | Whim\_11**

The Draft Local Plan has caused significant concern to local residents and its district councillor.

Land at Station Road is proposed for 33 new homes and further second-choice sites are pencilled in surrounding the village.

The Draft Local Plan acknowledges the constraints of "narrow lanes in and serving the village and...heritage sensitivities in respect of its historic core."

One Whimble resident contacted me, explaining:

"All vehicle access routes to the site are narrow country lanes with passing places and being north of the village centre requires navigating down the blind stretch of one-way system along Church Road. 33 houses with 2 cars per household would result in c132 more car journeys per day along this stretch of road exacerbating an existing problem of pedestrian safety risk, congestion, traffic jams, noise and detrimental impact on historic conservation area and residents.



“The impact of flood risk on neighbouring land – the old cricket ground is in a critical drainage area and development would cause unacceptable risk of flooding to neighbouring properties and development.”

### **Broadclyst | Brcl\_12 and Brcl\_29**

Residents are concerned that plans to build 160 homes on the combined sites of Brcl\_12 and Brcl\_29 would be significant over-development of the village by increasing its size by 15%.

One local group of residents contacted me, explaining:

“The volume of traffic generated by the sites cannot be accommodated on the local highway network without detriment to road safety. There are two access points from the B3181 into Broadclyst village. At present there is a lack of pavements connecting LP\_Brcl\_29 and LP\_Brcl\_12 to both schools and the bus stop, and similarly there is insufficient pedestrian access connecting LP\_Brcl\_09 to Clyst Vale College and the bus stop.”

Another Broadclyst resident cited the possible impact of more development on local services, explaining:

“Our GP is already under extreme pressure from the nearby large estates Westclyst and Cranbrook, which whilst have access to other GPs...Many patients feel the need to move to other practices. Not to mention schools, recreational areas and activities, and job availability. Competition is fierce, it’s highly distressing to think of it being even worse.”

I understand site Brcl\_09 is largely supported by the community because it is included in the Broadclyst Neighbourhood Plan.

### **Sidbury | Sidm\_34**

Land south of Furzehill is proposed for 28 homes and 0.15 hectares of employment land.

Concerns have been raised with me that this will only add to congestion on the narrow road through Sidbury and put further strain on the local infrastructure of the picturesque village.

### **West Hill | West\_04 and West\_06**

I am aware that there is significant local concern about the 51 homes proposed at West\_04 land adjoining Wind Mill Lane and West\_06 land north and east of Eastfield, alongside rejected sites for hundreds of homes on the fringes of West Hill’s current boundary.

West\_01 is arguably more palatable yet is categorised as a second-choice site, for reasons which do not appear to be clear.