

From: [REDACTED]
Sent: 15 January 2023 12:23
To: Planning Policy
Subject: Feedback to consultation on East Devon Local Plan
Attachments: Response to East Devon plan jan 2023.docx
Categories: Reg.18 consultation

Dear East Devon Council

(Comments are also attached as a word document)

Response to draft East Devon Local Plan -January 2023

We are local residents, living on Toadpit Lane in West Hill, who wish to register our views and concerns regarding the latest draft East Devon Local Plan. We have commented upon a previous iteration of this plan at initial consultation. We also attended the parish council drop-in on the public consultation in West Hill on 18th November and would reiterate all of our previous comments provided at the initial consultation, specifically, our objection to the development of large proposed sites between West Hill and Ottery St Mary and the lack of sustainability of large volumes of building within or around West Hill which has been designated as a Tier 4 settlement for the purposes of the draft local plan (due to acceptance that it has far less infrastructure or facilities). We feel that further house building would be unsustainable and likely to further restrict access to limited services for those already living within the area.

Since initial consultation, the written ministerial statement by Michael Gove on 6th December 2022 has highlighted that further changes to the planning system should **"place local communities at the heart of the planning system"** and that **"local housing needs" should be "a guide that is not mandatory"**. In his statement Mr Gove says he will instruct the Planning Inspectorate that they **"should no longer override sensible local decision making, which is sensitive to and reflects local constraints and concerns"**.

With these comments in mind, our overall concerns relate firstly to the use of large greenfield sites rather than brownfield or infill to meet disproportionately high and inappropriate housing targets in East Devon. The East Devon Housing Target appears to have been set with no consideration given to the special nature of the area and the large numbers of AONB in East Devon as well as the varied nature and feel of different towns and villages. This target is not in any way desirable or sustainable for East Devon. East Devon creates a huge amount of finance and jobs through the tourist industry and if we pave over everywhere and build in large volumes, we will not be considered a desirable green county any longer and we will simply become the 'Surrey' of the South West - visitors will go beyond us to Cornwall.

With respect particularly to West Hill, we find it very disingenuous that our own district council have decided to redraw the agreed settlement boundaries without making it clear during the consultation that they had done this and without consultation with local residents as happened previously when the settlement boundary was drawn by the West Hill villages Plan. If approved, this gives a tacit permission for developers to build on any green fields in and around our villages, this is not acceptable. It is almost impossible for us to identify exactly what the boundary changes proposals mean and as a lay person to incorporate and understand the massive potential development around Ottery St Mary and West Hill because these are not considered together, when clearly, they are intimately related to each other. The proposed numbers of houses allocated to West Hill are also disproportionately large for a tier 4 village with potentially 10% increase in growth since 2013 versus a smaller 2% growth of tier 1 settlements like Exmouth. How can this be fair or appropriate? This is

clearly just about the fact that there are more landowners on the edge of Ottery and West Hill who have put land forward for personal profit rather than whether this site is right for development. We would urge you to actively investigate sites of more sustainable development within these higher tiers rather than taking the easier route of agreeing to development in these non-sustainable areas

Focusing on these particular large sites put forward for development to the south and west of Ottery extending to the edge of West Hill bordered by Toadpit Lane, West Hill Road and the B1374 (GHED/21 GHED/22/GHED/23, GHED/24, GHED/25, GHED/26, Otry_01 and Otry_09), we understand that these areas are now designated red areas and particularly GHED/23 was 'Sifted out at Stage 2 of the site selection process as not adjacent to a settlement'. This is misleading as actually the small print suggests that they could be further investigated at a later stage therefore we wish to reiterate our concerns again. Clearly these red sites (including GH/ED/23) are entirely unsuitable based on lack of sustainability for development.

Our concerns regarding building on these sites, particularly those bordering Toadpit Lane and to the South of Ottery, include loss of the green wedge between Ottery and West Hill, lack of sustainability of this housing, poor road and transport access to the amenities in the village and the associated flood and environmental risks.

Local residents in West Hill already have to contend with minimal services, multiple single tract roads often poorly surfaced, few lit roads and very few roads with pavements to safely walk along. In addition, West Hill has no sports and recreational facility for local people with no field whatsoever for children and or adults to play sports such as football, rugby, rounders or cricket within the village. This is despite the West Hill wasps junior football team having almost 200 playing members but having to play and train on various school fields or hire recreational facilities such as the Colin Tooze sports centre (if there is ever any availability). Regarding local services, we must point out that in East Devon's Report to: Strategic Planning Committee Date of Meeting: 29 September 2022 Site Selection for the emerging East Devon Local Plan 2020 to 2040 – findings for Tier Three and Four settlements – small towns and larger villages, item 7.69 identifies **incorrectly** that West Hill has shops, but it only has one small shop, currently run by Morrisons (McColl's were in financial difficulty) which has been under threat of closure many times over the last 14 years.

Toadpit Lane, where we live, is a narrow single track woodland lane in our woodland village and is completely unsafe for any more vehicles or indeed people as confirmed by recent planning applications for building on the lane and within the village and any new building would contravene the Neighbourhood plans for Ottery St Mary and West Hill. Appendix 3 Road Network Issues Plans - states that the "road network and the built-up areas of the town and other settlements reflect the long history of occupation and the piece-meal development of roads and the wider built environment over many centuries. Roads once suitable for low volumes of non-motorised transport are no longer capable of dealing with current demands." Further that "new planning applications must adequately address highways issues so that development does not cause further deterioration but instead leads to significant improvements." This will clearly not be the case if this development progresses.

Several planning appeals for building of single dwellings at the margin of these sites including Toadpit Lane have already been rejected. For example, dismissal of an appeal to build a single self-build house on Toadpit Lane in January 2023. (Appeal Ref: APP/U1105/W/22/3303671 Decision -The appeal is dismissed.) In this case, the main issue was whether the location of the site was suitable for residential development and/or in a sustainable location. The comments of the planning officer in this case are entirely relevant also to building on GHED/23 and the other sites listed. Comments by the planning officer included *"Toad Pit Lane provides access to the village of West Hill within which there are a variety of services and facilities, including a school, shop and post office. Accessing these services and facilities would necessitate using the narrow, single lane road that is unlit and has no footways. Near the appeal site the road has no verges, being enclosed by trees and fences. There are no public passing places to the lane, thereby necessitating a reliance of all users of the highway upon private accesses and land to pass each other. The nature of the lane is such that anyone using it, including those familiar with it, would have to be highly alert at all times to the presence of other users so as to avoid conflict."* Those living in any potential housing developments bordering the B1374, particularly at the West Hill end ie GHED/23 would be very likely to access the centre of West Hill via car, with the shortest route at the Western end being via Toadpit Lane which would become a "rat run". This lane is a single-track road that cannot cope with increased traffic flow as described in the planning officers report when he rejecting the above planning appeal. It would be dangerous for the

residents on this winding single track lane including school children walking to school, pedestrians, cyclists and horse riders.

Furthermore, the DCC inspector considered the environmental harm from even this single self-build development which again would be mirrored and magnified for even larger proposed development adjacent to Toadpit Lane– *'it is likely that future occupants would be reliant on motor vehicles with the consequential environmental harm resulting from increased journeys'* and this *"fails to accord with Strategies 5B, 7, and 27 and Policy TC2 of the East Devon Local Plan (2016) (LP). These seek amongst other things, to direct development to particular locations, to protect the countryside, to encourage safe and accessible means of transport with low environmental impact, and to locate development so as to be accessible by pedestrians, cyclists and public transport, minimising the need to travel by car.'*

Part of GHED/23 lies at the top of a hill into Ottery. Our property on Toadpit Lane which borders GHED/23 has already been flooded, washing away our drive and covering much of our drive and garden right up to the front door with mud and silt from Mr Taylor's fields (GHED/23) in a previous large flood and despite remedial drainage across our drive and into a neighbouring field to try directing the water safely, it floods each time after heavy rain. Although, this situation is troublesome and an irritation, the field and crops do reduce the impact by absorbing some of the flood water. If the housing development was placed on this field adjacent to Toadpit Lane, the tarmacked, roofed and paved land would produce an inevitable enormous runoff of water through our and other neighbouring properties on Toadpit Lane which lie at a lower level than the adjacent field and then through our gardens to cause increased flooding of the lane itself making it impassable. Of significant concern, water runoff from housing development on this land and all the way down to Ottery will also likely cause very significant run off down the hill into Ottery which runs the risk of overwhelming flood defences in the valley and in a town which has already required bolstered flood defences due to regular flooding. This is therefore not a suitable place for a housing development.

The land itself (GHED/23) is also a wildlife corridor and regularly deer are to be seen roaming, along with buzzards in the trees, 2 species of owl, 2 species of woodpecker, bats, pheasants who run through the fields and across the land to the old quarry down and across to Fluxton.

This development would be located outside the Built-Up Area Boundary of West Hill and therefore located in open countryside where it would be remote from the services and facilities in the centre of the village and Ottery and consequently would result in an increased reliance upon private car use for most journeys to and from local amenities. It would therefore amount to non-sustainable development that would be contrary to the provisions of Strategy 5B (Sustainable Transport), Strategy 7(Development in the Countryside), Strategy 27 (Development at the Small Towns and Larger Villages) and (Policy TC2 (Accessibility of New Development) of the adopted East Devon Local Plan 2013 - 2031) and guidance contained in the National Planning Policy Framework (2019). Road infrastructure around West Hill and Ottery is not of sufficient quality to sustain large scale development and services such as schools and the local GP are already struggling to provide for the extra development which has already occurred. Transport links are poor with no train station and insufficient bus services. How is this proposed development compatible with environmental preservation and development of a resilient local economy? In fact, more should be done to provide a sufficient infrastructure for the current residents rather than adding pressure to local services by additional development.

In addition, a green wedge must be preserved between Ottery St Mary and West Hill to avoid coalescence of two very different settlements and to maintain their character and individuality. As residents, we should be allowed the opportunity to consult on the location of any boundaries to green wedges between Ottery and West Hill before any further development is proposed at the margins of these settlements.

To conclude, whilst we accept that some extra building is required to sustain the population of East Devon, we feel that arbitrary housing targets for East Devon are inappropriate and do not consider the views of the local community, constraints of transport, roads and facilities, local environment and local housing needs. Development should be prioritised in areas with sufficient infrastructure (Tier 1 and 2 locations) and on brown land rather than green field wedges around and between smaller communities. The comments by planning officers in appeal dismissals regarding planning applications around West Hill and also the recent ministerial statement by Michael Gove that *"housing targets are a guide and not mandatory"* and *"development should be sensitive to and reflect local constraints and*

concerns” should be taken into account in any further developments of the East Devon local plan. Rishi Sunak has now also confirmed *‘the target will be “advisory” and councils will be allowed to build fewer homes if they can show hitting it would significantly change the character of an area, an exemption expected to particularly apply to rural and suburban communities’*. Clearly this is exactly what would happen if the permitted development area between Ottery St Mary and West Hill was granted along with any significant proportion of the 900 houses suggestive for East Devon being built in and around the West Hill area which is clearly entirely unsustainable and would enormously affect the character of the area.

Yours sincerely

Drs Jane and Douglas Ferguson

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