

## **SUBMISSION FROM THE NORTH EAST RESIDENTS GROUP TO THE CURRENT DRAFT OF THE NEW EDDC LOCAL PLAN**

### **PROVIDING FEEDBACK ON THE DRAFT LOCAL PLAN**

We will not repeat here but can confirm that we are aware of a number of detailed problems that individuals have experienced in using the Commonplace system. Its inaccessibility prevents a fully democratic consultation.

Members of our group have made individual comments in the relevant sections of the plan using Commonplace, but our overall response is contained in this document which has been emailed to the EDDC planning policy email address.

### **ANNOUNCED CHANGES TO GOVERNMENT POLICY IN RESPECT OF HOUSING**

The Secretary of State Michael Gove has recently announced a number of key changes to the central regulations as they relate to the building of new housing.

We understand that included in the proposed changes are

- Greater flexibility for local authorities to take account of relevant local constraints when setting housing targets versus the current methodology, thereby lowering the total number of homes required
- The need to always maintain a five-year land supply will be removed
- Greater controls over holiday lets will be introduced
- Local authorities who are in the process of developing a new Local Plan will be given an additional two years in which to complete the exercise

Many sections of the draft Local Plan refer to the district's fragile natural environment that must be protected and the geographical constraints that exist within the district.

It is clear that the pressure of achieving the current housing target of building new homes 1,040 p.a. (as calculated using the current methodology) causes a number of direct conflicts between this and the need to take account of the district's geographical constraints, protecting the natural environment and a number of the key goals of the District's Climate Emergency Strategy. In particular the fact that a large proportion of the district's land area is designated as AONB places a sustainable burden on the west side of the district to meet the overall housing need (approximately 80% of the proposed allocations being in the west vs. 20% in the east).

To reduce the severity of these conflicts it is imperative that the impact of the Government's proposed changes in housing regulations have the chance to be fully factored into any new Local Plan for the District.

This is particularly true now given the likely removal of the five-year land supply requirement, allied to the opportunity for local authorities to take more time to address the impact of the new rules.

Given that the housing strategy is a crucial component of the Local Plan we strongly urge EDDC to follow the stance being adopted by Teignbridge and other local authorities around the country and, at the very least, pause the Local Plan development process (once the evaluation of the current round of consultation feedback has been assessed) until such time as the detail of the new regulations is passed into law. To go past this point risks pursuing the wrong overall goal in respect

of housing delivery and as one MP has stated, “wasting significant amounts of tax payer’s money” in the process.

### **THE OVERALL CALCULATION OF HOUSING NUMBERS AND ITS SPACIAL ALLOCATION IN THE CURRENT DRAFT LOCAL PLAN – Strategic Policy (S.P. 2, 3 and 8)**

At present one cannot assess what a revised target for housing completions should be if account were taken of the changes in Government regulations. However, it is clear that the need to urgently address the Climate Emergency declared for East Devon, and the environmental and geographical constraints that exist in the district, should lead to a substantial reduction from the current figure if the authority were given more latitude to take these factors into account.

The current draft of plan uses a methodology that aims to deliver 1040 new homes p.a. on sites put forward by landowners and using a hierarchy based on size of existing settlement

The result over the district as a whole is the allocation of a number of sites that are not sustainable (2<sup>nd</sup> choice and some preferred sites) and which contradict the key objectives of EDDC’s Climate Change Emergency Strategy 2021-41.

In particular EDDC’s Climate Emergency Strategy draft action plan calls for the development of a new settlement of 10,000 dwellings in the western area of the district by 2041. The new settlement would provide homes that can be supported by infrastructure to make them sustainable. (e.g. share a central heating system) and be linked to employment opportunities via sustainable transport links. Although now in abeyance, the Greater Exeter Strategic Plan similarly identified the line of the A30/A35 / SW Railway line as the axis along which the majority of development should take place.

In the draft plan this new settlement is proposed to be sited to the north of Hill Barton, south of the A30. However, compared to the 10,000 dwellings proposed above the current EDDC Local Plan only foresees 2,500 dwellings being delivered from the new settlement within the planning period.

We are concerned that not all the work regarding employment has been completed in time for this draft of the plan and, given that the majority of jobs are around the Exeter, Airport and Science Park, this would add weight to residential development in this area.

Increasing delivery for the new settlement site to over 5,000 homes in the planning period and adjusting downward the target homes to be built by 20% would remove just under 4,000 homes from the new site allocations set out in the table under S.P.2 - page 16/17. This should be combined with a clear focus on learning the lessons from the development of Cranbrook to ensure a much efficient process and effective outcome.

This would be the most effective way of removing all of the second-choice sites and an additional 20% of the preferred sites many of which lie in unsuitable locations\*.

\*Examples of this in respect of Exmouth (The Town) and Lympstone Parish are commented on below.

## THE ALLOCATION OF HOUSING TO EXMOUTH PROPOSED IN THE CURRENT DRAFT LOCAL PLAN

### Strategic Policy 20, 39

The current draft local plan has allocated a further sizeable new housing to Exmouth (as per the table in S.P.2 - page 16) ignoring the current pressure that local services and infrastructure are already under. In addition, it identifies locations that are very unlikely to meet pressing need of local residents to access affordable housing (S.P. 40) and to provide housing for the elderly (S.P. 41).

The draft plan proposes that in the planning period an additional 1,030 new homes are built in Exmouth and land adjacent to Exmouth in Lymptstone Parish over and above the 950 houses already completed or committed since 2020 adding c. 15% to Exmouth's population.

The logic for this as stated in the plan is that *"Exmouth is very well supplied with services and facilities with a large secondary school and primary schools, a variety of shops, sports facilities, a library, GP, hospital, railway station and regular bus services. The town centre, where most facilities are located, is positioned in a south westerly part of Exmouth. A consequence of this is that towards the outer edges of the town many residents are comparatively remote from some services and as such can be car dependent. (EDDC draft Local Plan page 70)*

This statement ignores the facts that

- Doctors and dental services are at or over capacity and no additions are planned
- Our one secondary school is full and children are being bused to other schools outside the town
- The sewage infrastructure (excluding the treatment plant itself) is inadequate
- Further erosion of green spaces will potentially increase flood risks
- 260 of the new homes will come from sites in the remote NE of Exmouth (including land that in Exmouth and Lymptstone Parish) which are very likely to provide medium density executive homes (viz.the adjacent Goodmores Farm development will only 16 affordable homes out of 300)

This must change with full recognition given to the real position on services and infrastructure and far greater emphasis placed on ensuring that any new homes built are affordable housing for existing residents nearer to the centre of the town.

## THE ALLOCATION OF SPECIFIC SITES IN EXMOUTH (INCL THOSE IN LYMPSTONE PARISH) IN THE CURRENT DRAFT LOCAL PLAN

### Strategic Policies 20, 39, 40, 41, 65, 74, 84, 85, 92

The allocations proposed for Exmouth are in locations with major issues concerning their sustainability. Many are also in direct contradiction with a number of the policies of the current neighbourhood plan (Exmouth –adopted in 2019).

- The plan to add an additional 260 dwellings in and around Brixington, together with Goodmores Farm and other developments under way will represent an increase in the area's population of c. 25%. This level of expansion cannot be supported by the immediate areas health facilities, secondary school places and sewage/drainage system.
- The suggested options in the NE of Exmouth (Exmo 04a, and Lymp 09,10a,14,)

- are over three miles from the town centre, lack sustainable transport links, access to local shops, doctor surgeries, schools etc. (S.P. 65)
  - Their location will make them more likely to generate further commuter traffic to Exeter than meeting the needs of the town for affordable housing (see below) thereby negatively contributing to the district's Climate Emergency strategy and contradicting the goals of (S.P.65).
  - The suggested sites to the NE of Exmouth encroach into the buffer zones protecting the Nationally important Woodbury Commons / Pebblebed Heaths which is a designated SSSI. The proposed sites in the North East will push the BUAB of Exmouth literally right up to the 400m of the SSSI. (S.P. 84)
  - These sites also play an important role in preventing flooding by handling the run-off water from the Pebblebed Heaths.
  - The need to provide access to sites to the north of the Hulham road the requirement of widening Hulham Road (as stated by a member of the EDDC team at the Ocean consultation meeting) can only be achieved by the removal of a significant number of the mature trees that currently line the whole length of the road, which have been protected by TPOs since 1972 and listed as '*a key element of the local landscape*'.
- The development of Lymp 09,10,14 and 15 is contrary to the Lympton Neighbourhood plan where any developments are expected to be in the Built-Up Area Boundaries (BUAB) and their development risks the inexorable process of coalescence between Lympton and Exmouth
  - The development Exmo 04a is contrary to the Exmouth Neighbourhood Plan policy EN1 and the clear wish expressed on p.29 '*the community is clearly indicating these areas are the last that they wish to see development on*'. This wish reflects to protect the presence of the protected Barbastelle Bat (S.P. 90) and a number of veteran trees (S.P. 74, 85)
  - Exmo 07 and 21 are subject to the Exmouth Neighbourhood Plan action EBA1 (p.54) for investigation to create a future conservation area. Both Exmo 08 and 16 are either adjacent to or within the area proposed for designation as a future Littleham/Maer Valley Park (p.34)
  - The Neighbourhood Plan calls for priority to the delivery of affordable housing. In contrast, the final approval for Goodmores Farm has required a reduction of the affordable housing from 25% to 5% due to, higher than expected costs of development. Given the close proximity of the North-East Exmouth sites to Goodmores, their remote location and the significant issues to be addressed in their development, it is very likely that development of these sites would make no material contribution to the affordable housing required by the Town. This expectation was confirmed at the consultation meeting held at Ocean in December to local residents by a member of the EDDC planning team who stated that it was expected that these sites would provide medium density executive homes.
  - To deliver what is required, greater consideration should be given to allocating more sustainable sites within the existing BUAB sites with a major focus on providing affordable housing for local residents e.g. re-development of the head of Camperdown Creek site (Exmouth Neighbourhood Plan p.67), the disused police station and post office and the southern section of site Exmo 20 adjacent to the Liverton Business Park and the solar farm.

- The proposal to create an employment site within the proposed mixed-use of the sites either side of Hulham Road is not practical. The sites to the north of Hulham Road are divided by the property Sowden Brake that is not part of the proposal and spanning the road is impossible.

Overall, we ask that the approach being adopted in the new EDDC Local Plan is fundamentally changed to:

- Pause the current process to allow urgent consideration to be given as to how the changes in government legislation would allow a lower number of new homes to be built p.a.
- place far greater emphasis on achieving the strategic goals set out in your own Climate Emergency Strategy by the faster delivery of more dwellings in new larger sustainable settlements closer to Exeter and better transport links and infrastructure
- reduce the overall housing allocations for Exmouth and Lympstone
- move away from the development of unsustainable sites particularly in respect of Exmouth and Lympstone

We believe, from meetings we have attended and discussions held, that the above views are shared by our local MP Simon Jupp, Exmouth Town Council, Lympstone Parish Council, our local EDDC Councillors, other Exmouth-based groups such as the Exmouth Civic Society and Exmouth Community Association, and other Lympstone-based groups.

Andrew Roberts and Stephen Canham

On behalf of the North East Exmouth Residents Group (NEERG\*).

\*NEERG represents over 50 residents who live in the NE Exmouth (in both Exmouth Town and Lympstone Parish)