

Established 1961  
Registered Charity No:



Planning policy  
East Devon District Council  
Blackdown House, Border Road  
Heathpark Industrial Estate  
Honiton  
EX14 1EJ

15 March 2021.

Dear Sirs,

### **Exeter Civic Society response to East Devon District Council's Issues & Options Consultation 2021.**

Exeter Civic Society wishes to comment on East Devon's 2021 Issues & Options Consultation because we have been concerned for some time about the level of traffic congestion in the city as a result of commuters from East Devon and elsewhere. We would like to see policies adopted in the next East Devon Local Plan which will alleviate the need for East Devon residents to travel to the city by car, and move to a more sustainable mode of working and travel.

In the 2011 census the number of jobs within Exeter (excluding at home and No Fixed Location) was 74,300. Set against the number of workers in 2011, the city had a job surplus of 36,700 filled by 27,600 commuters from the three adjacent Districts with the remaining 9,100 travelling greater distances. Over 75% of commuters drove their car to work because they had no alternative mode of travel. Statistics show that 11,000 East Devon residents travelled to Exeter, 7,500 travelled elsewhere, with 11,500 travelling into the district, giving a deficit of 7,000 jobs within the district.

In the Issues & Options Consultation document the level of commuting to the city is recognised, and the reasons given are higher salaries in the city, and a lack of work places in East Devon. The latter seems to be a result of changing work provision at local towns in the latter part of the 20<sup>th</sup> century, and a growth of work opportunities in Exeter, and more recently to the east of the city. This is also the case in Teignbridge, Mid Devon, North Devon and Torbay, but we hope that this situation can be reversed. We appreciate that as a result of the Covid 19 pandemic travel patterns may change, with more people working from home, but it is too early to determine whether this will be sustained into the future.

**We hope that EDDC will take account of development proposals in Exeter, Teignbridge and elsewhere when considering the allocation of homes and workplaces in East Devon.**



[www.exetercivicsociety.org.uk](http://www.exetercivicsociety.org.uk)

- To give some context to future development, Exeter City Council is proposing to build at least 12,500 homes in the city between 2020 and 2040, mainly on brownfield sites. It can be expected that each home will generate at least one worker, so there will be a need for about 12,500 new jobs during that period. But part of the city council's strategy is to build 5,000 homes at Marsh Barton, with the need to provide new education and other infrastructure facilities this is bound to result in a loss of employment places there that will need to be replaced outside of the city. In addition there are proposals for about 2,000 homes south of the city in the Teignbridge area, but with little or no employment provision. And with proposals at Cullompton for a new garden town, but with very little employment land to support people living there, there is additional competition for jobs in the Exeter area.

**We encourage the council to identify more employment sites to enable more people to work in their local town or area which will help reduce the level of congestion into Exeter or elsewhere.**

- Chapter 6 highlights many issues relating to the provision of employment sites, although it is suggested that more work is needed to encourage job growth elsewhere (6.7), and in 6.11 the list of policies to support the economy is welcome. But any policies relating to development sites must have teeth if the current level of single use car travel and pollution is to be reduced. We appreciate that the current allocation of employment sites close to Exeter will be developed, and that many of these jobs are intended to support Cranbrook residents. But we would ask that new employment sites are developed at Exmouth, Honiton, Axminster and Sidmouth, and that these sites will focus on establishing a mix of employment opportunities for the existing population, and an employment allocation which will give at least one job for each new home built in each community.
- We are supportive of establishing a Development Corporation discussed in paragraphs 13.17 to 13.19 and suggest that this could focus on developing employment sites in or close to your market towns to give people more local employment, including the provision of high quality high wage jobs. The Issues & Options report seems to focus on new developments, but a focus on existing communities will make a significant difference if you wish to make it possible for people to walk and cycle to work, and to reduce emissions and pollution. A Development Corporation can also work to address and overcome the barriers to business growth highlighted in paragraph 6.2 and 12.6 by ensuring high speed and high quality internet and phone connectivity. It may also be necessary to improve some highways to give better access to commercial traffic to make some towns more attractive to businesses, and improved sustainable travel corridors between towns and villages.

- if the district is to achieve the aspirations set out in Chapter 4 (Tackling the Climate Emergency), including paragraph 4.8 (5), it is crucial the above suggestions are core to your new Local Plan, with no more employment sites allocated close to Exeter, unless that is to support existing communities.

**We support the objectives contained in chapter 11 (Promoting Sustainable Transport), but we wonder if you have the powers to ensure that policies relating to transport and travel are implemented in the way that you desire.**

- In our experience, Devon County Council as the Highway Authority may have written strategies which support your objectives, but when it comes to implementation the resultant non-car infrastructure is lacking in quality and quantity. We see very little evidence in current large development sites in East Devon, Exeter and Teignbridge of high quality infrastructure for walking and high quality infrastructure for walking and cycling within and connecting communities.
- With bus services it is usually the case that they do not operate in new communities such as Cranbrook until a large number of homes have been built, and then at great subsidy from developers. It is much easier to extend existing bus services in existing towns to serve new communities.
- There is much talk about the provision of train services but these have very low capacity, new stations are very expensive (how does cost benefit analysis compare to a high quality cycle route?), and they do not often transport people between their homes and workplaces to help reduce congestion at peak travel times.
- The 2011 census showed that for journeys less than 2Km in East Devon 52% of people used active travel and 39% used a car. For journeys over 5Km 5% used active travel and 80% used their car. The census showed 34,000 people travelled by car to work, 1,350 by train, 1,500 by bus and 2,500 as a car passenger.
- Doubling the capacity of public transport will make a very small contribution towards reducing the use of cars, especially when considering that an additional 18,600 homes will be built between 2020 and 2040, all of which are likely to have at least one car, one person needs to travel to work.

**We support the strategies set out in chapter 12 (Infrastructure and Facilities) and hope that bus and other non-car infrastructure will be established at the commencement of any large development or expansion of towns and villages.**

- One of the problems we have seen with Cranbrook is the lack of jobs and public transport at the start of development, and we wonder if this is a reason to avoid another new town in East Devon. Expansion of existing towns and villages has many advantages in developing infrastructure because core facilities are already in place and expanding or enhancing these is much simpler than establishing them in a new community when viability will be a significant hurdle.
- Park & Ride can be a means of reducing car use, but at present it is being used as a 'last mile' strategy, resulting in many single occupancy car journeys to the edge of Exeter. We recognise that car use is essential in rural communities, but another approach could be to provide parking interchanges on main bus routes closer to people's homes; this will contribute towards reduced road use, emissions and pollution.
- We are pleased that in 12.9 you wish to consult the community on what infrastructure they need. One problem with establishing a new community is that there are no residents to consult. Developers, officers and councillors are left to fill this void but are they best to fulfil this role?

**We are pleased that in chapter 13 you state that you will develop a strategy that will set out what type of development should go to what locations and WHY (we look forward to seeing justifications that support your environmental aims).**

- We recognise the current strategy set out in paragraph 13.13 of developing development and housing close to Exeter, but the number of jobs in the area may be finite, and with Exeter due to expand with 12,500 or more homes, there will be more local demand for these jobs. As we have suggested in previous paragraphs, planners must consider the projected number of jobs and residents in the greater Exeter conurbation by 2040 and in your market towns.
- We support the aims in paragraph 13.8 for any spatial strategy to deliver the objectives set out for the plan in earlier parts of the Issues & Options report if the protection of the natural environment and promoting sustainable transport is to be achieved. This will support aspirations of sustainable communities for people to work and live in an area without using their car.
- We recognise that East Devon has a high level of AONB, but government guidance is clear that these areas can be built on when there are no alternatives. To avoid overdevelopment in the Exeter area, it may be necessary to expand some towns and villages despite the impact on ANOB – if not; people will continue to use their car to travel to work in the Exeter area.

- Some additional development close to Exeter will be appropriate, and it should be contiguous like Westclyst and Tithebarn if sustainable communities are to be realised.

**In response to paragraph 13.14 (Possible alternative options for future development), It is our opinion that a fixed number of new homes should be developed on the edge of Exeter rather than a percentile.**

- A percentile runs the risk of building more homes in the Exeter area than the number of jobs available, which is not sustainable. The danger of a percentile is that if government should increase the requirement to build homes in the district, then more would be built close to Exeter.
- You have a need for 6,615 new homes – the distribution of these must be accompanied with a clear analysis and justification to support a sustainable communities. This will result in a clear responsibility for District, Town and Parish councils to identify areas for development in their communities.

#### **Additional Matters**

- Members of the Society have studied travel patterns, transport use, travel migration and the reasons for Exeter's traffic congestion for many years now in an endeavour to find a solution to the city's congestion. In Exeter there are a high percentage of people who do not use their car to travel to work – this is because of the large number of jobs available. But we find that the majority of people who worked in the city and lived outside of the city in Exeter's travel to work area commuted by single occupancy car, and it is this that causes the city's congestion at peak travel times.
- It must be recognised that most buses operate on a hub basis transporting people to the centre of Exeter rather than to work places which are now more likely to be located on the outskirts of the city. The Highway Authority must do more to arrange for bus services running to workplaces at peak travel times.
- We have concluded that the most significant way to solve congestion at peak travel times is to encourage or enforce **car sharing**. If each car was to have a passenger then the number of cars commuting could be almost halved.
- Whilst suggesting that some development should be contiguous to the city, we do think that a green belt must be positioned between a 'greater Exeter' urban area and district communities. The provision and development of the Clyst Valley Regional Park is essential to this separation from East Devon communities, including Cranbrook, although we would support more pedestrian and cycle routes across it.

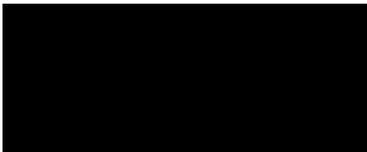
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- We are supportive of the council's statement in chapter 4 to reduce carbon emissions from new developments, but we have heard of difficulties that some residents of Cranbrook are facing with either the quality of insulation in new homes, or the level of heating, with some residents needing to run their heating for extended time of the day to keep their homes warm. Whilst in paragraph 4.4 there is an aspiration to see homes built with high levels of insulation, we wonder how you will enforce this based on the scenario in Cranbrook.

We look forward to seeing the draft publication of your next Local Plan with policies that are ambitious and realistic that will meet the district's aspirations to be carbon neutral by 2040, especially in reducing reliance on the car for single occupancy journeys.

Yours sincerely



Keith Lewis  
Acting Chairman

