

## RESPONSE TO THE DRAFT EDDC LOCAL PLAN

I am writing to provide my response to East Devon District Council's draft local plan as the district councillor for West Hill and Aylesbeare and the County Councillor for the Otter Valley.

1. It is essential that EDDC revises downwards by a significant margin the new houses it will accommodate within the district, to reflect the proposed revised planning policy outlined by Michael Gove, Secretary of State whereby housing targets are no longer mandatory. The previous target of 950 houses was an absurdly high level and EDDC had previously written to Mr Gove in March 2022 on my initiative complaining about the harm these numbers would cause to the district. In particular these arbitrary figures took no account of the environmental constraints of our district including the fact that two thirds of our district are within an Area of Outstanding Natural Beauty.
2. There has been significant housing growth in my local area, including 25% growth in Ottery St Mary and 75 houses built in West Hill. This is putting services in our area under huge strain, not least our GP practice at Coleridge Medical Centre. Residents in my district and county ward know only too well the pressures the local practice is under and the CMC themselves have voiced concerns to NHS England about increased housing numbers at the Cranbrook extension. It is dangerous to look at housing numbers solely on a village by village basis because actually groups of communities use the same services. So residents from West Hill, Ottery St Mary, Aylesbeare, Whimble and Feniton use the same GP practice. The draft plan is considering very substantial growth of 100s of houses in the wider Ottery area. Our schools are full and our roads are congested. Until infrastructure and services has been allowed to 'catch up' with recent housebuilding there should be no further development. When I was canvassing during the County Council elections in May 2021 many residents expressed their grave concerns about just how much development there had been in recent years and the impact that this was having on them.
3. It is widely accepted that there are huge benefits derived from active travel. It is important that the Local Plan includes as a priority infrastructure project the creation of a cycleway on the old railway line from Feniton to Ottery St Mary to Tipton St John to Sidmouth. This cycleway is supported in the adopted Ottery St Mary and West Hill Neighbourhood Plan and must be supported in the EDDC Local Plan.
4. In excess of 2600 houses in East Devon are second homes - this is roughly equivalent to the size of Cranbrook. Whilst it is EDDC's intention to impose double council tax on these properties, once the legislation is passed, the East Devon Local Plan does need to develop innovative policies to ensure that houses are not being built simply as second homes particularly when so many people locally, especially young people, are unable to get onto the housing ladder.
5. SWW are currently discharging significant amounts of sewage from the sewage treatment works at Fluxton and elsewhere into the River Otter. In 2021 sewage was discharged at Fluxton for more than 770 hours. It is essential that no further development is progressed until this issue has been resolved because further housing will simply exacerbate this serious problem.

6. The local plan needs to go back to 'first principles' – I believe that residents and councillors alike wish to prioritize brownfield development in our existing towns, and this also accords with national planning policy. Insufficient work has been carried out to explore potential redevelopment in the town centres of east Devon and time and time again I have asked for a comprehensive report fully exploring this but to no avail. This is particularly the case with land owned by EDDC including many car parks which could accommodate housing as well as car parking. I request a comprehensive report on this to be brought forward as a matter of urgency.
7. It is quite wrong in my view to be proposing a new town and overwhelming many of our villages with large amounts of housing (including West Hill) before exploring every redevelopment opportunity. The failure to do this work around redevelopment is resulting in a totally imbalanced local plan which is set to destroy 1000s of acres of our countryside. Take the proposal for a new town by way of example - many hundreds of acres of greenfield land will be ruined to accommodate new services such as schools and roads. I am opposed to a new town because I believe it is unnecessary particular given the new approach to housing figures.
8. EDDC planners have not created planning numbers which are consistent with the hierarchy of settlements. The result is that villages such as West Hill are set to carry the burden of a disproportionate number of houses. Why should West Hill experience 10% growth having already accommodated 75 new houses in recent times, when towns such as Exmouth and Budleigh Salterton with far more services jobs and facilities than West Hill are taking much lower levels. I don't see why West Hill, or any other village for that matter, should be burdened with disproportionate levels of housing without EDDC properly focusing on the towns. It may be the easy option, and developers may be clamouring to build here in West Hill, but it is not the correct option in planning terms.
9. I do not agree with development sprawling out from our towns such as at Exmouth. The approach towards the 20 minute neighbourhood is flawed because the concept should be that residents can walk to and from their services within 20 minutes, not walk 20 minutes to reach the services. What EDDC is doing is proposing completely unsustainable development which will cause immense environmental harm during a climate change crisis and biodiversity emergency.
10. I am strongly opposed to the three sites proposed for West Hill.

Site West 04 – Windmill Lane. The wonderful green field at the end of this quiet and narrow lane is ill suited to any development.

Site West 06 – Land north of Eastfield. Yet another wonderful greenfield and there are serious concerns about flooding from the natural springs and aquifers. This is ill suited to development.

Site West 01- Land at Westhayes. This wooded site is illsuited to any development and I am concerned about the impact on trees and the fact that it currently provides an important natural break between West Hill and B3180.

The 'rejected' sites should not have been included in the consultation at all. They must be entirely rejected once and for all. I do not support any of them (West hill sites 03,05,07, 08,,09, 10, 11, 12, 13, 14,15,16,17. I think it is misleading to have left them in the consultation for comment.

11. I am extremely dissatisfied by the way the planners significantly modified many boundaries (including West Hill) without notifying members or the public or making it clear that they are the subject of consultation. This will potentially open up 100 acres of greenfield space for development yet no one knows how much land across the district is being modified in this way. Plans must be produced to show the changes so that both residents and councillors can see what is intended on a settlement by settlement basis. In any event I am totally opposed to what is proposed for West Hill which will enable substantial development on the fringes of West Hill in unsustainable locations. The settlement boundary should continue to be the boundary that was approved by inspectors in the 2018 villages plan. It seems that criteria which were used in 2018 to apply a restrictive boundary are now being used to apply a much more loose boundary. The recent appeal decision for Land South of Treetops highlights the views of inspectors on developing in unsustainable locations and supports retaining the existing boundary.
12. As the County Councillor for the Otter Valley I formally request that EDDC allocates an appropriate site for the new Tipton St John primary school within Tipton St John. This is absolutely essential as the primary school lies at the heart of the community of Tipton and it must not be relocated elsewhere to Ottery St Mary for example. It was announced on 16<sup>th</sup> December 2022 that the school had been included in the latest round of the schools rebuilding programme. I have been liaising closely with DCC officers and pressing for the school to remain in Tipton. DCC officers have now confirmed in response to my formal question at DCC cabinet on 11<sup>th</sup> January that they now support the school being rebuilt within Tipton St John and not elsewhere and will be responding to you to this effect. The rebuilding programme will be led by the Department for Education but the views of DCC as the LEA are key and I trust that you will allocate a suitable site within Tipton St John.
13. It is essential that settlement containment policies in the adopted Ottery St Mary and West Hill neighbourhood plan are carried forward into the EDDC Local Plan. In my view it is a flawed approach to be consulting on potential sites across the district without first having considered the green wedges. I fear there will be an attempt to fit the green wedges around sites that have already been considered and therefore the green wedges will be compromised. To be clear I am strongly opposed to any encroachment into this area, for example the site Ottery 01. Both West Hill and Ottery St Mary are strongly opposed to settlement coalescence which is reflected in the adopted neighbourhood plan. A full green wedge must be maintained between Ottery St Mary and West Hill regardless of the wish for landowners to develop on this land. I am disappointed that the draft plan does not contain the green wedge policies and we must be given full opportunity to respond. I would not be at all satisfied if there is only a partial green wedge.

Cllr Jess Bailey  
West Hill and Aylesbeare (East Devon District Council)  
Otter Valley (Devon County Council)  
15<sup>th</sup> January 2023