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25/11/2022

Dear Councillors,

### **Public consultation of proposed East Devon Structure Plan November 2022**

Overall the plan addresses the concerns of the population, environment and energy requirements for the next 15-20 years.

We feel that the best option is for a new town to be created on the east side of Exeter as this will address the full needs of the people regarding schools, doctors, shops, parking and play/recreational areas.

The requirement for small local needs can then be met as they arise. Larger developments of over 200 dwellings do not fit into the current infrastructure of a town-village, and with the increase in population, needs are not met with doctors, schools, parking and shops. The outflow of raw sewage into the sea at Exmouth and Budleigh Salterton is a regular occurrence; the addition of more properties will only add to this problem.

### **Budleigh Salterton**

We do not agree with the proposed development of the old hospital, The Sea Change Hub, in Budleigh Salterton, for housing as this building offers the community a centre for multiple resources that is easy to get to with plenty of parking. The need for affordable housing will not be met on this site. The present health service is under immense pressure and the system does not work well; by removing this hub where are we to go? You can only 'sell the family silver once for immediate gain, but we need a long-term view reflecting the needs of the community.

Concerning **East Budleigh**, we would like to offer the following opinion:

Some of the new boundary changes would include some of the outlying properties which seems to make sense. The two new proposed sites for development are of concern for the following reasons.

**Affordable housing** 8.6 *Affordability and lack of sufficient affordable housing are major issues in East Devon. Some people describe it as a housing crisis. We have a combination of high house prices, high private rents and a low proportion of social and affordable rent properties. With a high affordability ratio of 10.0, this is one of the highest in Devon, above the national average of 8.00 and the southwest average of 8.76.*

8.7 *Additional affordable housing is needed particularly for newly forming, young households. National planning and housing policy and the Council Plan are seeking to increase the delivery of affordable housing. The amount of affordable housing changes through losses from Right to Buy and demolitions, but also through stock additions and tenure changes.*

As stated in the main document the cost of housing is the highest in East Devon with the local wages well below average, making it impossible for young families to purchase or afford rent which is also very high. The proposed development in the past and recently has been declined as not being viable as it does not provide the right cheaper housing to meet the needs stated above. An example of infill that has passed planning is for two £1.2 million houses and two slightly smaller properties in Frogmore Road, both built on a flood plain and hardly meeting the needs of the community.

The proposed two areas for development are the area by the Salem Chapel which would abut the main access road into East Budleigh and would have access problems and no safe pathway for people to use into the village. The other area is abutting Russell Drive. This boundary is at present outside the old plan but proposes to be included in the new one. The East Devon District Council states in the document that this has been assessed recently and they would not sanction planning permission due to the safety as the road entrance is on the brow of a hill. Quoted below for clarity.

*Land on the south side of Russell Drive Paddock at end of Russell Drive (0.58 ha) which could accommodate between 5-12 dwellings. • Site Ebud3 has recently been assessed by EDDC officers as being unachievable: - no access off Russell Drive due to the configuration of the Although development is unachievable at present it is recommended the site is kept within the settlement boundary in case circumstances change. Ref on Map 3 Changes proposed to boundary Comments Recommendation bungalows. Access off the B3178 is unlikely on highway safety grounds unless satisfactory visibility*

*splays can be achieved. The road is at the peak of a hill where visibility is exceptionally poor. • Ground Water Protection Zone (3 - Total Catchment) • Grade 1 agricultural land. However, it should be noted including this land within the settlement boundary does not comply with EDDC criteria for defining settlement boundaries. The relevant criteria are Criteria B6:- the site is over 0.15ha and the Council has not allocated the land as their assessment is development is not achievable. If the Parish Council wished to exclude the site could be excluded based on criteria B6.*

*The new areas of land within the looser boundaries are unlikely to deliver affordable housing. The number of houses required on a site within the settlement boundary has to reach a threshold of 10 or more houses before there is a requirement for 35% of the dwellings to be affordable. Therefore any houses built are likely to be market houses that do not contribute to meeting a local affordable housing need.*

*Protecting the best and most versatile agricultural land (Grades 1, 2 and 3a) from development not associated with agriculture or forestry. If the land has not been allocated for development within the local plan there must be an overriding reason for development.*

**Current Neighbourhood Plan Section 14.19.** *States that the parish has above the average number of four and five-bedroom properties compared to East Devon District and England. It also shows lower-than-average levels of small properties (1 and 2-bedroom dwellings). This would suggest a need for smaller developments to reflect the needs of local residents, at affordable prices. The property market has stagnated for over 10 years due to the banking crisis, resulting in first-time buyers being unable to get on the property market. Once again, with the Covid-19 crisis, the market has stalled resulting in slower sales. This does not meet the demands of local people; in fact, it rather limits their choice. Neighbourhood Plan Dwelling Size Policy D2:- Dwelling Size - new residential development should reflect the need for, and wholly consist of, smaller dwellings having 1, 2 or 3 bedrooms unless viability or other material considerations show a robust justification for larger dwellings.*

*Policy Justification 14.17 - The Neighbourhood Plan survey confirmed overwhelming support for smaller dwellings. The Neighbourhood Plan survey showed 80.5% of the community favoured new dwellings having 2 or 3 bedrooms rather than 4 or 5 bedroom homes (21.7%) or 1 or 2 bedroom flats (21.3%) (NB the question allowed the respondent to give more than one answer). 14.18 The 2011 Census information relating to the number of bedrooms in dwellings*

**This does not meet the requirements of the new local plan.**

I would add the following comments.

**NO FOOTPATH** could be provided if the properties were developed due to the other private properties abutting the main road. In keeping with the local area, only bungalows at the same density would be in keeping. This development would **NOT** fulfil the need for cheaper housing which is one of the main considerations of the document. Recent examples of housing modification that have been objected to by East Budleigh Parish Council have been overturned and granted by East Devon District Council. Groundwater protection zone 3 is defined as the area around a supply source within which all groundwater is presumed to end up at the abstraction point. In confined aquifers, the source catchment area may extend for some distance from the source. A development could hinder water collection, and with climate warming, we may need to be more aware of how we manage our water supplies, a bit like wind and sun power for electricity generation. The requirement regarding grade 1 agricultural land will not be met either. The present sewer system seems to be overloaded and discharges often after rainfall. East Devon District Council has proposed to East Budleigh Parish Council that they could exclude the site based on criteria B6, quoted below.

*B6. Parcels of land larger than 0.15 of a hectare may not have been considered suitable for allocation, but nevertheless may provide suitable development opportunities if applicants demonstrate through the development management process that individual proposals would be acceptable. The inclusion of any site on this basis is likely to be exceptional as our preference is to specifically allocate sites of this scale. However, it is possible that there may be some sites that are constrained so that they are unlikely to yield enough dwellings to justify the allocation. It may be difficult to resolve the potential difficulties of developing such sites through the local plan process, but they may still have the potential to enable small-scale incremental growth of settlements if specific proposals are found to be acceptable through the development management process. Very few sites are likely to be included based on these criteria.*

When the current Russell Drive was developed in the 1980s the top end was left open with the hope of extending it through to the main road. **NO** permission was granted due to a lack of safe access to the main road and the use of grade-one agricultural land that was not owned by the developer.

A further four bungalows were then built and another application to access the main road was turned down. After a few more years a third application was applied for yet again - & yet again was turned down for the same reasons. The present two bungalows were then built.

A history of rejection over forty years, plus the recent East Devon District Council's refusal for outline development has not changed any requirement and it is hard to justify the inclusion of this plot into the parish as nothing has changed over time and the need for cheaper homes cannot be met on this site.

We, therefore, ask you to consider removing the new boundary from the plan and keeping the present boundary in this area.

Graham & Catherine Kingham