

EDDC Planning Department
(Draft Local Plan Consultation)
Blackdown House
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ



9 January 2023

Dear Sir/Madam,

EAST DEVON LOCAL PLAN 2021 TO 2040 – COMMENTS

A thorough review of the entire spectrum of areas affecting residents in East Devon over the next 17 years. The presentation is excellent and the thoroughness of a wide range of officers is very apparent.

Inevitably, the Plan will result in a wide range of concerns with those relating to housing development probably resulting in a significant number of comments.

The proposals for the number of houses, where they might be located and the impact on infrastructure that are my main concerns. These are summarised as bullet points at the end of this letter.

The number of new homes proposed for East Devon appears to be excessive and not aligned with actual needs. For example, Lypstone is facing plans for approximately 500 when the community knows that this number of homes is not required to meet local needs. The revised Lypstone Neighbourhood Plan did not identify a requirement for up to 500 homes. Furthermore, it emphasised a strong desire to maintain the existing built-up boundary and strengthen the protection for the green wedge to maintain Lypstone's identity.

Housing Targets

Targets set by the government are driving the expansion. Algorithms and formulas can never be a substitute for local knowledge and decision making by communities who know their area best. The methodology used by government disproportionately impacts on rural rather than urban areas.

The proposals for the East Devon Local Plan 2021-2040 appear not to be aligned with revised government aspirations and policy. Housing targets have been watered down and councils given more flexibility in determining targets. The overriding ambition is to deliver the right number of homes in the right places.

The Draft Plan should at least be adjusted to accommodate the watered-down targets. Furthermore, it is not clear that the Council has challenged the government on the

issue of total requirements and how the figure for East Devon was derived. This apparent opaqueness fosters distrust in how the housing targets are set locally.

Development sites

The housing developments proposed for Exmouth and Lympstone are not in the right place. The correct place for major expansion of housing in East Devon is at Cranbrook and one of the sites proposed adjacent to the A30 where the optimum infrastructure is/will be in place and the road and rail links can accommodate a significant increase in commuter traffic.

Naturally, there will be requirement for small scale housing development locally – small infill site in the right place and with housing numbers restricted to a maximum of 10 to 15 properties. It is essential that housing design is sympathetic to the nature and grain of existing properties. This has been neglected in the past.

Infrastructure

There is a perception that planning departments and the Highways authority have a blind spot when addressing the impact of new houses and pressure on infrastructure, and specifically roads.

A resident of Exmouth since the early 1970s, I have witnessed a huge expansion of housing development locally. This has taken place without any significant improvements to infrastructure, particularly the main artery out of the town along the A376 to the Sandygate junction with the M5 motorway. A plan for some 4 new routes north and north-east of the town to alleviate the issues of the A376, published in the early 1980s. It foundered when it failed to secure support from local landowners. It is difficult to envisage how any improvements could be made to the existing A376. This fact should place a barrier to any significant house building when the existing major sites, such as Goodmore's Farm have been completed.

Employment opportunities in are limited and the majority of working age residents will commute to Exeter and further afield in Devon for work. A proportion will use public transport but living adjacent to the A376 at Courtlands Cross it is quite evident that the majority travel by car.

The proposed Dinan Way Extension (DWE) will do nothing to alleviate the issue of traffic volumes, congestion and pollution along the A376, particularly at busy times of the day. This £12m project, probably more now, is likely to exacerbate the problem along the A376 by introducing another choke point, before a further hold-up at the Saddler's Arms traffic lights in Lympstone.

The claim to by policy makers that the DWE will alleviate the traffic issues in Exmouth is questionable. The real issue is not the traffic in Exmouth, which is exacerbated by increasing and unnecessary housing development, but the flows along the A376 from the boundary of the built-up area to the M5 interchange at Exeter.

Population Growth

It does not require delving into the Census data to see that there has been a significant influx of people from other parts of the UK to Exmouth and the surrounding area over

the past forty years. A proportion have followed new employment opportunities in the Exeter, but many have settled here in retirement. This has not been accompanied by an expansion of infrastructure and facilities in general, the medical facilities being but one example. If the Local Plan results in the number of houses proposed it will exacerbate the problems of:

- Traffic congestion and pollution along the A376 corridor.
- More elderly residents retiring to the area placing additional strain on medical facilities.
- Shortage of school places.
- Strain on existing infrastructure in general.

Proposals for Lypstone - Protecting the Green Wedge

Adhering to the policy that houses need to be built in the right place, the proposed site 07 north of Courtlands Lane Lypstone is certainly not the right places for up to 140 houses.

This site is fundamental to maintaining the integrity of the Green Wedge, as referred to above (para.4). It is shown as Coastal Preservation Area and Green Wedge in the Local Plan 2013 to 2031, both offering protection from development.

In the face of huge local opposition during the period 2010 To 2014, a Planning Inspector turned down a proposal to develop this site. In the light of this ruling, it is quite extraordinary that the site, that was not considered to be an option in the 2013-2031 Plan, is suddenly a second-choice site. One has to suspect high level interference. If this is the case, then it makes a mockery of local democracy, from the perspective of both views of residents and the local Neighbourhood Plan.

Originally Listed as Grade 1 Agricultural Land, the fields at site 07 are now classified as Best and Most Versatile Agricultural Land. It is significant that this site is the largest of three remaining area of high-grade agricultural land in vicinity of Exmouth and the only one in Lypstone. Historically used for arable crops, for the past 40 years the fields have been used for mixed agriculture. Since 2010 the fields have been devoted to corn production. That some 26 acres of high-quality agricultural land could be devoted to housing is at variance with the objective of reducing the carbon footprint of our food chain and to improve the country's self- sufficiency in food production.

The arguments for not developing this site are documented in objections to planning applications dating back to 2010 and leading to the appeal process in 2014, the result of which was the Inspector's ruling that the site is not suitable for development. There will be a vigorous campaign by the community to challenge any future planning application that may emerge.

Summary

- The number of homes proposed for Exmouth and Lympstone appears to be excessive.
- Government Housing Targets exacerbate the issue of too many houses being built in rural areas rather than urban areas. This may partly explain why so many houses are proposed for Devon.
- There is no evidence that the Draft Plan is allowing for watered down housing targets.
- There is no evidence that the Council has challenged how the housing targets for East Devon were derived.
- The right place for new development is at Cranbrook and one of the new town sites proposed adjacent to the A30 east of Exeter.
- Further major development at Exmouth and Lympstone should be halted after the completion of Goodmore's Farm and then be restricted to small infill site of 10 to 15 houses.
- The barriers to improving the traffic flows along the A376 should dictate that no further major housing development takes place in the vicinity of Exmouth.
- The Dinan Way Extension will not solve the issue of traffic volumes in Exmouth. The issue of high traffic volumes on the communications' network is linked to overdevelopment. The majority of residents occupying new homes will commute to Exeter and beyond.
- Site 07 in Lympstone should not be included in the list for major housing development. It has two levels of protection and an Inspector at an enquiry in 2014 ruled that the site is not suitable for settlement. It is quite extraordinary that the site that was not identified as a possible development site on the 2013 to 2031 Plan has now become a second-choice site.

Yours faithfully

