

Comments on the East Devon District Council (“EDDC”) draft Local Plan 2020-2040 (“the draft”)

Submitted to : The EDDC Strategic Planning Committee

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Introduction The following comments submitted jointly by the owners of houses situated in the North Western part of land designated as “option 1” in the the draft,

(one on each side of the lane running from the A30 Southwards to Bishops Court) are set out in response to the public consultation on the draft initiated by EDDC.

Given the scope and details of the work which has gone into the draft and its supporting evidence, and bearing in mind the stage which the draft has reached, it would be inappropriate, not to say impossible for us as individuals to examine matters of detail ‘across the piste’.

That said, and having digested as much of the draft as time permits, we are concerned not to have found answers to the following 3 key questions; and we believe others share these concerns.

1. Is a second new town of up to 8,000 dwellings plus ancillary buildings necessary or desirable in East Devon, and if so, has that conclusion been reached in the light of full and up to date information?
2. Has the risk of loss and damage to what Devon represents been properly weighed against the possible benefits of a second new town?
3. Has full consideration been given to a possible alternative, namely to address East Devon’s needs without building a second new town?

Question 1.

The strong impression conveyed by the draft is that it is a “given” that a second town is necessary, and that the focus of consultation in this respect is not ‘whether’ but ‘where’ it is to be. However,

1.1 The Government directive requiring Local Authorities to put forward proposals for the creation of given numbers of new houses in their respective areas was, in effect, countermanded in 2022. Any duty or obligation under which EDDC may have approached future housing need was to that extent removed. New national policy or guidance is apparently expected in 2023, but it is most unlikely to reinstate that obligation.

1.2 A key item of evidence supporting the draft is “ The Role and Function of Settlements”, (“The Role”) delivering as it does information on population, employment, community facilities and services. It is based on a study of the

2011 census, undertaken before East Devon's first new town, Cranbrook, came into existence. Publication of the results of the 2011 census commenced in June 2022 and is apparently to be completed this year.

1.3 The Role provides (at paragraph 1.4) that the "development strategy will... include new settlements" and noted that the East Devon Local Plan 2013-2031 special strategy comprised 3 tiers, viz :-

A. West End: Cranbrook  
Black Horse  
Pinhoe

B. 7 Towns: Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Sidmouth and Seaton.

C. 15 villages (including Clyst St Mary and Woodbury).

Cranbrook is of course a new town (predicted to house 18,000 people) whilst Black Horse and Pinhoe are acknowledged to be 'large developments'. Thus while 'The Role' recognises the significance of tier A developments, both plans and (important) statistics for Cranbrook are omitted from the draft. Consequently the effect of the building of the first new town, Cranbrook, on the area's need for housing, work and (in particular in the case of Exeter) further employees is not effectively examined by the Role - although Cranbrook is expected eventually to house 18,000 people, is directly connected by both rail and road to Exeter and is already regarded as successful in itself; and the potential effect of locating a second new town so close to the first cannot be appreciated from the draft (more of this below). And yet the draft appears to proceed, as we have said, on the basis that a second new town is to be built, and that the key issue is simply location.

1.4 Paragraph 3.40 of "The Role" states "it is too soon to know whether this short - term trend [work from home culture or "WFH" started during the Covid lockdown] will continue in the long term. It may be the case that fewer people travel to work in the future, making the co-location of new housing and employment development less important."

Again we think WFH, and the extent to which it does or does not persist, has an important bearing on both the "whether" and the "where" of a second new town.

For example "The Role" reports that 41% of the working element of East Devon residents travel outside the district to work. What effect on that figure would a second new town have?

We suggest that the growth of or reduction in WFH is likely to have a rather greater effect than the construction of Cranbrook (let alone a second new town) on the 41% figure.

## Question 2. Losses and gains from a second new town

2.1 Despite the declared intention to express a 'vision' for the future, the draft fails to consider the matter of how either the inhabitants of the East Devon or others see their area - why they value it and enjoy it, and wish to live in or visit

it. Nor conversely does the draft address the matter of how the building of a second new town of up to 8,000 or eventually 10,000 houses plus ancillary buildings and the consequent loss of the agricultural land involved might damage that perception.

## 2.2 East Devon includes

- coastal towns and beaches
- one side of a large estuary
- much open countryside, farmland and hills
- abundant bird and other wildlife
- a major coastal centre at Exmouth
- the cathedral city of Exeter

This combination of assets provides so many opportunities for residents and, importantly, visitors - whether for walking, cycling, swimming, sailing, birdwatching, or simply enjoying the relaxation and tranquility to be found here. It is recognised as a wonderful place to live or to visit.

2.3 Equally, an area endowed with such assets also contains numerous constraints on developments, as the draft recognises (the AONB, the nature and value of the coastal towns and scenery, the spread and quality of villages situated between Exeter and the Eastern coastal area, the pebblebeds, for example, and many others). Some represent serious obstacles; and possible sites for a second new town are therefore very limited. Three sites are identified, and it is no surprise that, in order of preference, option 1 is that compromising a large expanse of thinly - populated agricultural land, whose owners are willing to give it up for development.

2.4 Our concern is that the likely combined effects of the developments at Pinhoe, Blackhorse and Cranbrook (stretching to the East and North along the North side of the A30) and a second new town covering 650 acres on the South side of the A30 would create a real risk of altering the perception of this area from that outlined at 2.2 above, very much for the worse. While intended as a very high quality, modern, carbon-zero town, taken with the other recent areas of development to the East of Exeter, a second new town could well be perceived as 'urban sprawl' - the replacement of a wonderful place to live or to visit by an ever-expanding conurbation.

2.5 In addition, the loss of 650 acres would, of course, conflict with the accepted need to increase the Country's self - reliance in terms of food production, and also (in literal terms) with the aim of achieving " a greener East Devon", identified as one element of the Local Plan vision.

2.6 We note that a whole plan viability assessment is yet to be commissioned.

### 3 Consideration of alternatives to a second new town.

3.1 For the reasons outlined above, we are concerned that EDDC has reached a conclusion (that the draft must include a second new town) prematurely and without full evidence to support that conclusion.

The following were not available or 'unknown' when the draft was prepared:-

- The Government's revised approach to planning and development
  - the results of the 2021 census
  - the nature and extent of the impact on East Devon's needs of the building of Cranbrook (in addition to Pinhoe and Black Horse)
  - the extent to which WFH would persist in the longer term
  - an assessment of the viability of the draft (including the second new town)
- All however should be available within a matter of months; and, meanwhile, the existing Local plan has several years to run.

3.2 No reader of the draft can fail to be impressed by the enormous amount of work that must have gone into its preparation; and we recognise that it is intended to provide a template for planning and development decisions over the next two and a half decades. But far the greatest single constituent of the draft is of course the proposal to build a second new town. As we have said, the question of its location appears to have taken centre stage in the consultation process, despite the comprehensive survey of, and the detailed proposals for lesser developments throughout the area covered.

3.3 What, however, is not apparent from the draft is why EDDC has come to the conclusion that the vision for the District's future MUST include a second new town. Accordingly, when the gaps in investigation and evidence (see above) are filled, and consideration is given to referring the draft on to an inspector, we think particular attention should be given to whether East Devon's development needs COULD be satisfied by incremental development spread throughout the area, which would focus investment on much - needed affordable local housing, transport and communications infrastructure, instead of by a second new town.

If a convincing answer to that enquiry resulted, one way or the other, we think it would greatly assist the process of gaining acceptance for a new local plan.

3.4 These comments are put forward bearing in mind, in particular, that

- the draft appears to focus attention on where, as opposed to whether, to build a second new town, and
- reaction in principle to a second new town seems, to date, from public and press comment, adverse.