



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

9 January 2023

Dear Planning Policy Department

## **RESPONSE TO CONSULTATION – EMERGING LOCAL PLAN 2020-2040**

Please find below my responses to the draft Local Plan for East Devon. I hope you will take them into consideration as you move into the next stage of planning.

### **1. Change in Government Targets for house building should lead to a revision of the plan as a whole**

**Ref: P18 Strategic Policy - Levels of future housing development 1.** This Paragraph of the draft plan states that:

*'Housing provision will be made for at least 18,920 dwellings (net) to be delivered in the plan area in the plan period 1 April 2020 to 31 March 2040, whereby: a. At least 4,070 (net) new homes should be affordable housing; and b. At least 14,850 (net) should be market housing. 2. The annualised district housing requirement for 5-year housing land supply and housing trajectory purposes will be 946 dwellings per year (net).'*

My first point is that provision for housing in the WHOLE district should be reviewed. My understanding is that quotas for numbers of homes to be built was a requirement of a quota system dictated by central government, (not local need.)

I refer to the [Guardian article on 5 December 2022](#) which reports,

*"Rishi Sunak is to drop compulsory housebuilding targets..... Instead, the target will be "advisory" and councils will be allowed to build fewer homes if they can show hitting it would significantly change the character of an area, an exemption expected to particularly apply to rural and suburban communities."*

East Devon District Council should therefore scrap the proposed housing provision quoted above and propose a drastic reduction in planned house-building in East Devon. There is insufficient infrastructure in East Devon to support the housing targets in the draft plan and additional chunks of housing developments will significantly change our district's character forever – the Western end of the district has already been changed beyond recognition with the thousands of houses at Cranbrook, Westclyst, Poltimore etc. It is important to act on this change in government policy swiftly, as it is likely that whichever party is in power after the next general election, house-building targets will be likely to return – we should seize the opportunity in East Devon to capitalise on this current change in strategy to finalise our plan with a major reduction to planned development. It is important to keep East Devon's character, and preserve the environment for the enjoyment and wellbeing of both residents and the many visitors who are coming from cities and towns, to escape to our 'green lung' for their holidays.

I also refer to **Paragraph 3.27.** of the draft plan,

*“To date, through local plan production work, the Council has not received requests from any Neighbourhood Planning Group for a housing provision requirement figure for the Designated Neighbourhood Area.”*

Surely this indicates that East Devon residents do not want more houses – the push for new developments is coming from a small number of landowners and property developers! In Ottery St Mary where I live, I know the Town Council has written to East Devon District Council informing them that we do not want any further development. Please take into account our local views.

## 2. Brownfield Sites

To minimise environmental destruction and to preserve as much farmland as possible, I would like to see a statement, at the beginning of the draft plan that preference will be given to planning proposals on brownfield sites.

I refer to **Paragraph 17.13 (Page 300)** of the draft plan. It states,

“the council has been legally required to prepare, maintain and publish a brownfield land register of sites.”

This seems to me an add-on at the end of the plan, and it is only being done as a government requirement. On environmental grounds, I would expect to see in the plan that the Council has a preference for brownfield sites to be used. This should be stated in the introductory paragraphs of the plan, perhaps as part of the Spatial Strategy.

## 3. Economic Growth and change in working culture

**Paragraph 11.8 of the draft plan** acknowledges that the Covid-19 pandemic led to more people working from home. Yet the section in the Draft Plan about future employment and economic growth (**Section 3, starting at paragraph 3.29**) makes no mention of the changes in working practices. Many people are still working from home full or part time and due to the improvement in technology, people in high-paid jobs can now work from home in East Devon.

I would like to ask the council to revisit its (traditional) assumptions about the amount of land needed for new industrial activities and office spaces. Can they do a survey as to the actual usage of current business premises in East Devon, and find out how many empty shops, offices and industrial units there are, before proposing so much land to be allocated for business purposes, as a ratio to new houses. The world is changing, business models are changing, and we may not need to allocate so much land for economic activity, especially green spaces.

## 4. New Town

I refer to **page 15 – Strategic Policy – Housing distribution**. In the table on this page, a new town, East of Exeter, is proposed, on the A3052, with 2500 new houses. This road is already extremely busy, with many traffic jams tailing back from the roundabout at Clyst St Mary village causing hold-ups. Additional housing would make using this road intolerable. Many other aspects of infrastructure are not in place to support such a town, such as NHS provision, and it would be detrimental to the environment and also take up good quality farmland.

**East Devon District Council should grasp the opportunity created by the change in government policy to scrap mandatory housing targets, and drop any plans for a new town.**

## 5. Ottery St Mary – General Comments

**Paragraphs 6.33 – 6.39 of the draft plan.**

I live in the Ottery St Mary area and would like to make the following general comments about the land which has been offered up for development in the Ottery St Mary area:

- a) The number of planned or allocated housing developments allocated for Ottery St Mary under the currently operating Local plan has been far exceeded. We have already taken on more than our fair share of housing in the very recent past.

However, in the new draft plan, it appears there have been more houses per existing head of population proposed for Ottery (perhaps as it is nearer to Exeter than other towns in East Devon), yet there is not the infrastructure to support it. Ottery is losing its identity through this massive increase in housing which has already been thrust upon it.

- b) Ottery St Mary is already straining at the seams after the current over-development. The road system is overloaded and often has hold-ups, there are not sufficient places in the primary school and the doctor's surgery does not provide a satisfactory service due to the numbers of patients (eg there is a month's wait to see a doctor).
- c) Sadly we have just had news that Aggregate Industries has been successful in its appeal to open a quarry off the main Exeter Road leading out of Ottery St Mary. This will result in a constant stream of slow lorries, loaded with stone, coming out of a side-turning and travelling up and down this main road out of Ottery. Additionally, East Devon District Council planners recently agreed to an animal crossing with lights to be installed on the Exeter Road, near the quarry entrance, to allow the farmer to move dairy cattle from the farm on the quarry side of the road, to the other side where there will be pastures not being mined. This situation is going to cause a huge impediment to the many drivers who use this main road out of Ottery to get to Exeter/A30 for work, business, school runs or pleasure. There will be queues of traffic going up to Daisymount and also down into Ottery St Mary at certain times of day. This is without any additional housing in Ottery St Mary. If any more homes are built, life is going to be intolerable for our community. I urge East Devon District Councillors to take this major change in circumstances for Ottery into account and acknowledge that it would not be appropriate to plan for more housing developments in Ottery.

## 6. Objections to specific Sites Around Ottery St Mary, proposed in the Draft Plan:

### Paragraph 6.33 of the draft plan

- a) *Barrack Farm (Otry\_01b) – this land at Barrack Farm, on the western side of Ottery St Mary, is proposed for a mixed-use development to provide around 70 new homes and 1.25 hectare of employment land.***

This land is on an elevated position above the town of Ottery. It should not be built on for the following reasons:

- Risk of water run-off on to the new houses below, and down into the town.
- Urbanisation of the Otter Valley – this would be indiscriminate urbanisation of the Ottery area. A new roundabout, houses and industrial units above the town would signal the 'beginning' of Ottery urban area within what is currently precious countryside.
- Traffic – this site would be on the main road out of Ottery St Mary in the Exeter direction. It is already very well used and with the instigation of a quarry with many slow lorries travelling along it further up the road, there will be major traffic jams along that road. Additional traffic caused by any new housing would be a health and safety risk and detrimental to the wellbeing of drivers who will experience daily frustration trying to get to school, work and business.
- Unsubstantiated need for industrial units. Before agreeing to any additional industrial units around Ottery St Mary, the council should establish a need. A quick look online as I write this letter shows

that one property company is currently advertising 4 units to let on the Finnemore Trading Estate, 0.4 of a mile away. <https://www.property-sales.com/Listings/Commercial-Property-To-Let-in-Finnemore-Trading-Estate-Otter-Saint-Mary-EX11-1NR-UK>

- A recent planning application for a house with an agricultural tie (Planning Ref 21/1860/FUL) was approved adjacent to the site, by the owner of the proposed building land. This application was agreed with the condition that the house would have an agricultural tie. If the Council now agrees to build houses and commercial units on this land (which incorporates the current farm buildings), how can this new house (21/1860/FUL) continue to have an agricultural tie – with less farmland next to it, and the farm buildings removed? From the planning approval it would seem that this land and farm buildings need to remain agricultural, to comply with the conditions of the building of that house.
- Light pollution – researchers have proven that light pollution has a detrimental effect on ecosystems - animals, birds and plants (see this article from the United Nations Environmental Programme: <https://www.unep.org/news-and-stories/story/global-light-pollution-affecting-ecosystems-what-can-we-do>). Building on this site, due to its elevation up the Otter Valley would result in light pollution being cast from streetlights, across the valley. Additionally, business units often keep bright lights on all night (as exemplified by the lighted signs of the wall of 'Coverstructures' on the Finnemore Industrial estate which light up the night sky as you enter Ottery). We should be considering the environmental impact of all planning proposals on the environment. This proposal should be avoided!
- Please also see sections 1. And 5. above with my additional, general comments.

***b) Land at Thorne Farm (Otry\_09) – this land, which lies west of the town, adjacent to the sports centre and school, will provide 90 new homes.***

This land should not be included in the plan for the following reasons:

- Risk of flood water run-off from the quarry to this site, and thence on to King's School houses below, and down into the town.
- Urbanisation of the Otter Valley – this would be indiscriminate urbanisation of the Ottery area. A new roundabout and houses above the town would signal the 'beginning' of Ottery urban area within what is currently precious countryside.
- Traffic – this site would be on the main road out of Ottery St Mary in the Exeter direction. It is already very well used and with the instigation of a quarry with many slow lorries travelling along it further up the road, there will be major traffic jams already along that road. Additional traffic caused by any new housing would be a health and safety risk and detrimental to the wellbeing of drivers who will experience daily frustration trying to get to school, work and business.
- Quarry – with the quarry now agreed, there are severe concerns about how the quarry operations will cause water pollution. This proposed site is directly below the quarry site, so there could be a major safety concern.
- This proposed site is directly next to a site of special scientific interest, namely the Cadhay bog. Even if houses were not built directly next to it, there will be human disturbance, litter etc which could affect this sensitive site, which has taken hundreds of years to form.
- This land is currently outside the agreed boundary for permitted development in the Ottery St Mary neighbourhood plan.
- Please also see sections 1. And 5. above with my additional, general comments.

**c) Land at Salston Barton (Otry\_10) – this land, which lies north and south of Salston Barton, is proposed for 20 houses.**

**And**

**Land south of Strawberry Lane (GH/ED/27) – this land lies south of Strawberry Lane and is proposed for 60 houses.**

This land should not be included in the plan for the following reasons:

- they are partly within a flood zone.
- There is no footpath to the town, and the lane from the site to the main road is very narrow and has poor visibility.
- Access by car is from very narrow lanes, with the lane going to the Salston being particularly dangerous, as it has a sharp bend and is very narrow.
- Please also see sections 1. And 5. above with my additional, general comments.

**d) Gerway Farm (GH/ED/29) – this land at Gerway Farm, off Sidmouth Road, is proposed for 40 houses**

This land should not be included in the plan for the following reasons:

- Increased traffic coming in and out of a new housing development to the crossroads at the top of Tip Hill, Ottery St Mary, would increase traffic along the narrow Sidmouth Road, creating problems not only in the immediate vicinity of the proposed development but further along the road both directions, increasing gridlocks approaching Ottery town centre down Tip Hill and also in the Sidmouth direction in places like Wiggaton, where there have been accidents and even a fatality in an incident during a traffic jam.
- Additional houses in that area would result in additional pedestrians needing access the primary school in Longdogs Lane, which involves them crossing the busy crossroads at the top of Tip Hill. There would also be additional traffic movements at that very narrow crossroads, which is a pinch point, coming into Ottery St Mary. It would not be safe to have extra traffic or pedestrians in that area.
- Please also see sections 1. And 5. above with my additional, general comments.

I hope that you will take my comments into consideration,

Yours faithfully

Naome Glanville