

## OIL MILL LANE RESIDENTS' ASSOCIATION

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12<sup>th</sup> January 2023

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

By email to: [PlanningPolicy@eastdevon.gov.uk](mailto:PlanningPolicy@eastdevon.gov.uk)

Dear Sirs

**RE: Response to Consultation on –**

1. East Devon Local Plan 2020-2040 Preferred Options Reg. 18 consultation draft, November 2022
2. East Devon Local Plan 2020-2040 – Preferred Options consultation draft **Sustainability Appraisal report**, November 2022

On behalf of the Oil Mill Lane Residents' Association we wish to make the following comments relating to both of the above elements of the East Devon Local Plans.

### **1. What are the issues with building a new town?**

We see a number of major problems with the principle of a “New Town” -

1. Will a “new town” be needed in the light of Teresa Villiers successful amendment to the Levelling Up and Regeneration Bill allowing councils to take Government housing targets as advisory and NOT mandatory? With the continuing low economic performance in the UK the need can only be receding. Allowing Local Authorities to make their own judgements will allow a more dynamic and focussed response to the real needs in East Devon.
2. The draft Sustainability Appraisal states on page 221 that “no other alternatives have been identified ... to be considered a ‘reasonable alternative’ ” – this is wrong as the ‘dispersed’ option, spreading houses through suitable towns and villages including Cranbrook, has not been included as a way forward WITHOUT needing a new town.

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3. The initial 2,500 houses to be built by 2040 could largely be covered already through the Council's 2022 Housing and Economic Land Availability Assessment (HELAA) which identifies enough land for circa 30,000 houses. Indeed in 2018, South Somerset District Council informed their Local Plan with a report on 'The Potential for Rural Settlements to be Designated Villages' and to achieve housing growth that way.
4. No infrastructure plan is in place and explicitly NO additional infrastructure (including road modification) is apparently needed for the first 2,500 houses due by 2040 (Sustainability Appraisal Report, page 232, Reasons for Options to be rejected or accepted, bullet 1).

Indeed there is no guarantee that the 2,500 houses will not be built and then stopped at that point. Infrastructure will then never get built and we would be left with a sprawling housing estate with no facilities. To ensure this cannot happen there should be a separate plan for the new town as was the case with Cranbrook. Even this has not meant that buildout has gone smoothly and many promised facilities have still not yet been built whilst others are already oversubscribed.

5. The draft Sustainability Appraisal Report, page 224, final paragraph summarises the possibility of minimising carbon emissions, stating Option 1 is likely to have a major positive effect on minimising it; this is overstated. A new town does not minimise carbon emissions (as it's really a suburb of Exeter) – no consideration is given to the massive carbon footprint of this new SUBURB versus growing existing rural settlements.

Evidence of the above can be seen from the report by Sabrina Zwick, Research Associate, Institute for Environment and Human Security (UNU-EHS), United Nations University in July 2021 shows that suburban living has a worse carbon footprint than either rural or city environments. This is because consumption of goods and services in suburbs is still much higher than in rural areas due to the proximity to a city ie Exeter which will increase travel and offsetting other carbon benefits relative to rural locations.

Initially, with only 2,500 houses built with no services, the residents of the new town will have to travel to other locations thus increasing the carbon footprint for the whole of the Local Plan period. Given the above this may never change!

6. Insufficient land has been made available for **Suitable Accessible Natural Green Space** (SANGS) and Biodiversity Net Gain (BNG).
7. A new town takes decades to deliver as only a few large developers would be involved and delivery rates for new home completions will be lower as a consequence – especially in early 5 years of the plan. A larger number of developers would be involved in a 'dispersed' approach which would allow faster buildout rates.
8. A spatial strategy based on one large new town versus a more dispersed approach also means the plan has no flexibility if problems occur. It also means that with a small

number of developers the market will be controlled by the consortium in charge just as it has been at Cranbrook.

9. Concentration in one large town also means that the number of small sites is minimal – contrary to Government guidance and also deeply prejudicial to SME businesses.
10. One final point about a new ‘town’ - if the social housing capacity is dissipated by allowing new residents from other local authorities outside East Devon, then the spacial strategy is not being followed.

## **2. Are Options 1 and Option 3 good options?**

1. The Sustainability Appraisal Report mentions sustainable travel choices for all site options – this is incorrect as there is no train service other than Cranbrook or the Avocet Line (Exeter to Exmouth with relevant stations at Newcourt, Exton and Topsham) all of which require car use to access but lack parking. Residents will be reluctant to travel the average 2.5-3 Km to Cranbrook or Topsham, even by bike, to get a train to Exeter.
2. The draft Sustainability Appraisal Report states that “overall a likely minor negative effect is identified for Options 1 and 2 – this cannot be said to be “minor”. The effect of such a large development over 100’s of acres could never be described as “minor”.
3. The draft Sustainability Appraisal Report Section 4 discusses Climate Change carbon emissions. There are two points to consider here. 1) The comment regarding local lanes and low traffic volumes doesn’t stack up, this is going to be a NEW TOWN/suburb with at least 8,000 cars. and 2) the proximity of the National Cycle Network Route 2 - this is some 1.5 km distant from the proposals and is not on a “desire line” where people will naturally make use of it.
4. The draft Sustainability Appraisal Report states “Options 1 and 3 benefit from their proximity to Exeter and the series of train stations along the Avocet line ...” This is incorrect as neither have good access because of the limitations and capacity of the nearby roads and lack of parking for both bikes and cars at Topsham, Exton and Newcourt.
5. Draft Sustainability Appraisal Report page 228 includes a “Health and Wellbeing commentary” there appears to have been no consideration of the health and wellbeing of existing residents!
6. Draft Sustainability Appraisal page 228 “Access to Services commentary” is totally unrealistic for 8,000 homes! Exeter city, Topsham (very limited parking) or Cranbrook are the only service centres of a sustainable scale, access to all will require the use of a car.
7. Draft Sustainability Appraisal Report page 230 “Connectivity and Transport commentary” states “Options 1 and 3 benefit from their proximity to Exeter” this may be true but neither has any sustainable means of access!!

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8. Page 231 of the draft Sustainability Appraisal Report goes on to look at “mitigation measures”. When considering the second bullet point (make use of existing habitats and features, seek opportunities to expand/create new habitat, including the Clyst Valley Regional Park) for Option 1, the same must be true of either Option 2 or 3 which could be similarly enhanced.
9. The mitigation measures do not mention any improvements to either Junction 29 or 30 of the M5. As anyone who uses this road network regularly knows it is already at standstill during the daily commute.
10. Page 232 of the draft Sustainability Appraisal Report looks at “reasons for alternatives being preferred or rejected”. It states Option 1 is preferred as there is greater certainty of delivery, so has this simply been preferred because it is ‘developer controlled’ by a small number of developers? This would make it more efficient for the developers and cheaper for the Council.
11. Mention is made of the proposed Energy from Waste (EfW) plant at Hill Barton – waste to energy is NOT low carbon in itself. As has been the case with biodigesters, other cleaner forms of energy exist but the profit motive drives more waste to these sites than should be the case. Like biodigestion, EfW schemes should be part of an integrated approach to energy provision aligned with environmental best practice. If this is not the case then the operators of the schemes are driven by the desire for increasing capacity and lowering costs at the expense of carbon reduction.

We trust you will take the above comments into consideration when considering the public’s responses to the Local Plan and Sustainability Appraisal Report.

Yours faithfully,



**Chris Booker**  
Co-Chairman



**Ray Kemp**  
Co-Chairman