

## **RESPONSE TO THE EDDC DRAFT LOCAL PLAN BY MARTIN THURGOOD**

### **1. OPENING REMARKS**

**1.1** Thank you for the opportunity to comment on your draft local plan. The 'Have Your Say' format was not suitable for my response. Hence the following.

**1.2** The draft proposals are difficult to follow due to the site maps provided and the over-riding emphasis on housing allocation compared to other equally important issues relating to land use.

**1.3** While the detailed settlement maps show housing proposals, other potential land uses - e.g. employment, recreation, etc – are missing. Moreover, the maps of 'west' and 'east' that do suggest land uses other than housing are virtually unintelligible even when expanded in the extreme.

**1.4** One issue that is unclear is the potential allocation of land for solar energy: it appears to be almost without limit – unless the colour coding is misleading. There are no doubt others due to the point raised in my paragraph 1.3.

**1.5** There is little suggestion on how many of the policies will be delivered (other than housing which will clearly be developer-led). For instance, to give but one example, Green Infrastructure, Strategic Policy 16, is worthy in its aspirations but if firstly focuses down on one area (the Clyst Valley Regional Park) to the exclusion of other areas and secondly has little to suggest how the policy will be achieved across East Devon. The same might be said for other over-arching strategic policies where it is not clear how they can and will be delivered. A local plan that principally delivers on housing to the exclusion of other land-use needs is not a viable local plan. Delivery mechanisms for all of the proposals should be referenced (if not formally part of the plan should planning law prohibit). The Ottery St Mary Neighbourhood Plan provides an excellent example of how this might be achieved in your local plan.

### **2. HOUSING TARGETS AT LARGE**

**2.1** Central Government has recently changed its approach to housing targets. It is not apparent that this new more relaxed approach to national targets has been taken on board in your draft local plan.

**2.2** The draft plan presumes that both 'preferred' and 'second choice' sites are used to the full to meet the suggested housing targets. This is illogical: either the plan identifies suitable sites to meet the target it sets, or it does not. The draft makes clear that 'Second choice' sites are inferior. The plan should identify sufficient 'preferred' sites or it is not a sound plan.

**2.3** Moreover, a plan that suggests that 'non-preferred' 'second choice' housing sites are acceptable is simply opening up opportunities for a 'free-for-all' with applicants for other as yet unidentified locations advancing them on the grounds that they may well be 'second choice' and inferior locations, but that such is acceptable within the policy approach set by EDDC.

**2.4** As a general principle, new communities that meet current and future planning and environmental standards (such as zero carbon) are clearly the way forward rather than placing housing in less compliant and less satisfactory locations such as existing settlements. To do so simply continues negatively to add to current carbon-intensive land-uses. To this end, new town/new village developments that are fully planned to be carbon neutral in all respects is clearly the way forward to meet national and local 2050 commitments. The plan should acknowledge this

fundamental point and develop an approach that meets the National '2050' zero-carbon objectives through carbon-neutral 'new town' and 'new village' development.

### **3. NEW DWELLING PROPOSALS FOR OTTERY ST MARY**

**3.1** Your draft document fails fully to acknowledge and address 'key messages' and concerns in the extant Ottery St Mary Neighbourhood Plan made and approved by EDDC as recently as 2018 and relevant for the period through to 2033 (See paragraph 6.35 of your draft).

**3.2** Your draft acknowledges (and does not criticise or refute the value and the conclusions of the neighbourhood plan) that:

- the neighbourhood plan **articulates community concern about the volume of new housing development and a desire to ensure the response to on-going development pressure is balanced**. The Plan's vision seeks to ensure any new developments are appropriately sited, well related, and contribute positively to the locality whilst meeting local needs and ensuring delivery of all necessary infrastructure.
- **The need to address traffic issues in the town centre, and capacity of health and education provision, are also key concerns of the neighbourhood plan.**

**3.3** However, your draft proposals fail to recognise and respond accordingly.

**3.4** Ottery St Mary has experienced 25% growth in housing in recent years, far more than other settlements in East Devon. This has happened as a result of development permitted by EDDC and following planning appeals (the latter point is highlighted in your draft for other settlements but notably absent in the draft text for Ottery St Mary). The consequence of this 25% growth has meant that local health and education services are stretched to beyond a reasonable capacity, but your draft text makes no mention of these matters.

**3.5** Significantly, the neighbourhood plan that was accepted and approved by EDDC in 2018 makes no allocation for major new housing development sites up to 2030 as a consequence of the 25% expansion recently experienced for obvious reasons. However, the proposal in your draft local plan is for a further 288 dwellings. This is wholly beyond what is reasonable. Moreover, it is not supportable when these housing proposals are compared to other settlements such as Honiton and Sidmouth when their relative size and the advantages of their public transport connectivity is taken into account.

**3.6** Your draft suggests that Ottery St Mary has good public transport provision to Exeter: however, the reality is that there is no rail link and provision is no more than one or two buses an hour with journey times of around one hour. The reality is that Ottery St Mary is a commuter town for Exeter but lacks fast and frequent public transport links: this inevitably leads to commuting by car which is contrary to national climate change policies. The logical conclusion is that the Town is not a suitable location for further housing growth.

**3.7** Your draft says nothing on addressing the traffic issues in the town centre and the capacity of health and education provision that you acknowledge.

**3.8** The mention of the 'Feniton to Sidmouth' cycleway is welcomed: it is long overdue and would help create cycle links into Ottery St Mary from Tipton St John and elsewhere. However, there appears to be no proposals or policies that relate to funding. Such should be addressed.

**3.9** Road connectivity is poor. The route to the south should be upgraded to the 'B' road that it once was.

**3.10** Better public transport provision to Exeter must be addressed.

#### **4. NEW DWELLING PROPOSALS FOR OTTERY ST MARY: CONCLUSION**

**4.1** The only reasonable policy conclusion that can be reached is that Ottery St Mary should not be expected to contribute as many new dwellings as proposed towards meeting the EDDC target.

#### **5. OBSERVATIONS ON SPECIFIC SITE PROPOSALS: OTTERY ST MARY**

**5.1** Notwithstanding the reasons given for limiting housing expansion in the Town, the following comments are made about the specific housing proposals.

##### **5.2 LP\_Otry\_09**

**5.2.1** This housing development is contrary to the neighbourhood plan.

**5.2.2** The area does not meet the '20 minute' standard for access to local service that you set out in your draft document.

**5.2.3** The fact that Devon County Council need to raise funds, in this case by selling land to fund a school, is not a sound reason under planning legislation to designate the area for housing. DCC may have funding problems, but these cannot be resolved by 'overriding/bending' planning constraints. In any event, DCC has recently publicly announced that they have central government funding for the new school (essentially, the project to relocate Tipton St John School) so making the need to raise funds by the development of housing at this site is now irrelevant. Hence the principle reason given in the draft plan for developing this site falls.

**5.2.4** The proposal for housing at this site has quite properly already been considered by EDDC and rejected.

**5.2.5** There is no objection to a new school (which does accord with the neighbourhood plan).

**5.2.6** There is a well-known risk from flash flooding due to the Thorne Farm Stream: the suggested site encompasses part of the flood risk area of that stream. The risk of flooding is likely to have increased following the grant of planning permission for a neighbouring quarry.

##### **5.3 LP\_Otry\_01b**

**5.3.1** Your draft makes clear that the proposed site for development land at Barrack Farm lies wholly within the 'settlement containment' area covered by Neighbourhood Plan policy NP4 (i.e. it is beyond the built-up area boundary accepted as recently as 2018 by EDDC in the approved Neighbourhood Plan).

**5.3.2** While visibility from West Hill is one issue – and the only point identified in your draft text to suggest that this site is suitable for housing – there are other considerations that you fail to address, not least your '20 minute' rule for access to community facilities that would be breached, the wider concerns that led to the neighbourhood plan's 'built-up area boundary' excluding this site and the role of the 'Green Wedge' when considered from the viewpoint of Ottery St Mary rather than just West Hill. The 'Wedge' serves both communities – and not just the one.

**5.3.3** It is not clear why there needs to be 1.25 hectares of employment land in this housing proposal: there is already land previously designated for employment that is yet to be developed and which is more suitably located next to existing employment land at the Finnemore Industrial Estate.

**5.3.4** Indeed, the failure to develop the existing provision over many years speaks to the point that Ottery St Mary has become a dormitory town for Exeter with all of the negative outcomes for 'Zero carbon' and other national environmental strategies, and, as such, its further expansion and development as a dormitory town is contrary to national objectives.

**5.3.5** In passing, there is no obvious reference in the draft plan to the extant policy for expansion of employment provision at the Finnemore Estate. Does that provision continue or, if not, what is now proposed for that site? (This point amplifies the point earlier made that local maps in your draft plan only address housing provision and not other potential land uses).

#### **5.4 LP\_Otry\_10**

**5.4.1** Part on the proposed site is within a restrictive area due to the flooding risk: this seems unacceptable.

#### **5.5 LP\_GH/ED/29a**

**5.5.1** It is not clear why sites of secondary relevance are then treated as having the same significance as preferred sites when accounting for the full numbers of dwellings proposed in the draft plan. (see earlier comments).

**5.5.2** The proposed site also seems to demonstrate a willingness to creep towards (if not impinge upon?) zones where restrictions apply due to the presence of high-pressure gas transmission pipelines.

#### **5.6 LP\_Otry\_15**

**5.6.1** The proposed site also seems to demonstrate a willingness to creep towards (if not impinge upon?) zones where restrictions apply due to the presence of high-pressure gas transmission pipelines.

**5.6.2** Planning permission has previously been denied, including on appeal, for development at this location (15/1663/MOUT). It seems difficult, if not impossible, to acknowledge that the location may now be suitable.

### **6. OTTERY ST MARY & SOLAR ENERGY**

**6.1** As noted earlier, the colour-coding of land use maps suggest that nearly all land is suitable for development for solar energy. It is presumed that that is not the case. If the contrary is true, then such a broad-brush approach to future land-use is unacceptable and should be refined.

### **7. OBSERVATIONS ON SPECIFIC SITE PROPOSALS: TIPTON ST JOHN**

#### **7.1 Otry\_04**

**7.1.1** This 'second choice' allocation for 45 homes is no longer required according to your draft document taking into account the recent public statement by DCC that they have central government funds to rebuild and relocate the school (to Ottery St Mary).

**7.1.2** Your draft makes clear that in the event that land is allocated in Ottery St Mary for the relocation of the primary school in Tipton St John then the village would no longer meet the threshold for a Tier 4 settlement and this potential allocation, Otry\_04, would not be taken forward.