

WITH REFERENCE MADE TO EXMOUTH IN THE DRAFT LOCAL PLAN

Why the rush ?

The current Local Plan (2013 - 2031) [adopted on 28 January 2016] and the Exmouth Neighbourhood Plan (ENP) are scheduled to be in place until 2031 and should not be replaced at this juncture.

EDDC's Emerging LP is suggesting significant changes which are against the will of Exmouth residents, who overwhelmingly voted for the ENP (87.62% in favour) just three years ago. EDDC should respect the democratic will of the electorate and residents and let the existing NP & LP run their course.

The date of the emerging Local Plan is given as 2020 - 2040. This implies that EDDC are intending to use this document to backdate any changes to the new Plan against the preceding Plan (2013 -2031). It is of serious concern that EDDC appear to wish to override the democratic process.

On 6th December 2022 the Prime Minister jettisoned compulsory house-building targets. Targets are now merely advisory, acting as a guide that is not mandatory. The Secretary of State's statement on the same day, set out a clear direction for proposed changes to the NPPF which may have implications for the Local Plan Review (LPR) now underway.

EDDC, in our view, should concentrate on developing a strategic position to show that by hitting 'advisory targets', the character of our part of Devon would be damaged.

The Exmouth area is bounded on four sides:

To the:

- West by the River Exe Estuary
- South by Lyme Bay
- North East by the bio-diverse Pebblebed heaths of Woodbury Common
- East by ANOB and valuable farm land

These geo-physical constraints to urban sprawl should be taken in to consideration in EDDC's planning strategy and the Council should not just kowtow down to targets/requirements set out at national/county levels.

In Exmouth, The Exe Estuary and the East Devon Pebblebed Heaths are designated as Special Protection Areas (SPA's). Developments should only be allowed if they will not cause additional pollution to rivers, the sea, the Estuary and protected "Habitats sites" Nationally there *is* a precedent (e.g. The Solent) for Coastal and marine authorities to reduce the number of approvals, due to nitrate pollution causing dense algae growth which affects protected habitats and bird species; perhaps EDDC can follow suit ?

We would therefore urge EDDC to seriously consider how using a national formula derived target as a basis for their LP is justified.

Perhaps their energy would be better spent on making a case to revise the housing target downwards in order to mitigate any threat to the nature of East Devon and, in this case, Exmouth.

Until central Government's position is clear, EDDC should follow Teignbridge's example and put a hold on their LP review.

Infrastructure

As highlighted in the existing LP and the Exmouth Neighbourhood Plan, there is a critical need for a co-ordinated strategy and implementation plan relating to the infrastructure for Exmouth.

The road network is muddled and overcrowded, roads are unfit for purpose, car-parking throughout the Town and on the Sea-front is woeful and inadequate to meet the needs of residents and visitors.

The omission of the proposed Dinan Way extension, is concerning. This is needed NOW to remove commercial, resident and visitor traffic from having to go through the Town Centre.

Public transport provision is poor and the “integrated transport strategy” is not working. Cycle paths are uncoordinated.

There are serious concerns among Exmouth Residents regarding:

- the lack of Health Service facilities
- School children being bussed out of the area
- The sewage and water treatment situation which is threatening swimmers health, the Town’s economic well-being as the Blue Flag status and causing reputational damage..
- Tired and poor shopping facilities in Exmouth

The Emerging Local Plan [*Chapter 2.5 (10) EDDC needs to liaise with other statutory bodies and utility organisations to ensure that any proposed developments can be fully supported by existing infrastructure or ensure finance is available to secure the necessary infrastructural changes or improvements*] recognises the imperative need for a co-ordinated approach to Infrastructure issues.

Based on experience, confidence that the various Bodies and Agencies are capable of this, is low.

I remind EDDC of the failure to deliver infrastructure changes (in red below) as identified in statements in the existing Local Plan (2013 - 2031) *Adopted on 28 January 2016*

“Strategy 22 - Development at Exmouth

Exmouth will see larger scale development. Working with our partners in Exmouth, we will specifically plan for and promote proposals that are consistent with the strategy which is to promote:

5. **Infrastructure** – key elements of infrastructure provision will need to include:

a) **upgrading of public transport** provision to and from Exeter, primarily through the **provision of an integrated transport interchange** and other enhancements to public transport improvements;

b) **completion of Dinan Way**, this highway completion is likely to require developer contribution funding. Land shown on the Proposal Map is safeguarded for completion of Dinan Way and in the safeguarded area development proposals that could prejudice development of the road will be resisted; (see also Policy TC8);

- c) **upgrading of sewerage, mains gas and public water supply, education, medical and social care provision in Exmouth** to facilitate the growing community and changing demographics; and
- d) **a 210 pupil primary school**, including a nursery (at Goodmores Farm).
Now a supermarket !!
- e) **Contributions to and improvement of walking and cycling routes** in the town, through new provision and links and enhancement of existing provision.”

Furthermore there is a history of failure to deliver on Queen’s Drive, the Waterfront, the Gateway and to introduce innovative attractions (e.g. coloured pavements and cycle routes to guide people, a major centre such as an outreach Natural History Museum [see St Ives & Tate Gallery], a Town/tourism icon [e.g. Spinnaker Tower -Portsmouth / Angel of the North etc.] . These should be prioritised before sanctioning more urban spread.

Type of housing

Evidence suggests that Exmouth is in dire need of **affordable housing**, particularly for existing residents and those coming to the area to work in sectors which are traditionally lower paid e.g. hospitality, Tourism.

It is recognised by Exmouth Town Council and EDDC that there is ‘a major shortfall’ in respect of affordable housing.

EDDC have a shameful record of giving in to developers by not enforcing a minimum level of affordable housing in a development.

This has resulted in:

- i) a disproportionate of ‘incoming’ new residents, many of whom are 55+, and can afford housing at higher prices.
- ii) Housing being bought up by investors who are ‘AirBnB-ing’ properties, thus not catering for long term rentals.
- iii) Properties being used as ‘second homes’, and pushing local property prices higher

I remind you of the Secretary of State’s statement of 6th Dec:

“It will be up to local authorities, working with their communities (NOT developers)**my addition*, to determine how many homes can actually be built, taking into account what should be protected in each area which is sensitive to and reflects local constraints and concerns and will give local communities a greater say in what is built in their neighbourhood.”

Policy 40, in the LP allows for developers to work the system, by claiming it is not viable to meet Planning requirements to % of affordable homes in a development. This Policy should be removed and EDDC should enforce higher levels of affordable housing are included and honoured.

EDDC’s track record in this matter is not one to be proud of.

Green Space

Referring to “... what should be protected in each area ...” the LP indicates that the Council seems intent to cover every area of green space in Exmouth with houses, shops, industrial units, roads and solar panels.

This is wholly undesirable and flies in the face of the LP statement:

3.10. EDDC recognise the importance to protect the outstanding countryside and coastal areas and intend to protect those areas from development. Building in these special areas will detrimentally change the characteristics of these areas

Green spaces are essential to the wellbeing of residents. [ref: Chapter 2.5 (6) Healthy spaces is a pre requirement to support the provision and sustaining of good mental health for all. Area identified in local neighbourhood plans should be welcomed by EDDC and supported].

The suggestion that the **Maer Valley**, (which was identified in the ENP as a Country Park) is suitable for Solar Panel use is quite outrageous and to be resisted.

EDDC and Clinton Devon Estates have, in recent years, allowed significant encroachment in the Maer Valley.

The emerging LP appears to be encouraging further housing developments in the Maer Valley, which will:

- threaten wildlife habitats
- impact of natural water quality
- have a negative impact on the character, visual benefits and amenity offered by the Valley

Furthermore allocating continued developments in the Valley (Douglas Gardens *Exmo 06* & Littleham Fields *Exmo 08 / Exmo 16*) along with the arbitrary moving of settlement boundaries appear to illustrate a lack of concern for one of Exmouth’s invaluable green ‘lungs’.

A valued Green infrastructure proposal, would enable the extension of the existing Maer Valley, replicating the plans for the Clyst Valley Regional Park.

Local economy

We are pleased to note EDDC's stated position that:
"there is an intention to attract businesses to the area and are identifying sites for this purpose."

We have concerns over whether or not the allocations in the LP are sufficient to serve Exmouth's needs and also that no information is provided as to how employment will be found for all the new home owners in the local area to reduce unnecessary journeys to work.

We assume that there will be an appropriate enforceable transport plan to support any employment developments, in order to minimise cross-town car use.

It is imperative to the well-being of Exmouth that it does not become a satellite town of Exeter, and so minimise the daily exodus of residents to work in and around Exeter.

Currently Exmouth has:

- a poor selection of retail outlets dominated by cafes and charity shops
- a tired Magnolia Centre
- town centre roads blighted by HGV's and volume of traffic
- a traffic-saturated link road (A376)
- lack of an integrated transport hub

All matters that need prompt attention if the local economy is to thrive.

It was also encouraging to note that the LP recognises the value of existing businesses reliant on **tourism**, particularly as the industry is under considerable threat from matters such as:

- A failure of SWW to ensure sewage discharges are properly managed is jeopardising the 'Blue Flag' status
- Poor road/rail access
- Pitiful sea-front Car Parking provision for visitors and the growing number of Exmouth residents who have to drive to the sea front to enjoy the amenity.
- Unattractive pedestrian and cycle links from the Town to the sea front
- Seashore management of anti-social behaviour
- the lack of initiative and imagination on Queen's Drive
- lack of housing for 'tourism based' staff

Solutions to the above problems need to be addressed as a matter of priority before Exmouth as a destination, suffers reputational damage.

No provision appears to be made for the significant increase in day/evening visitors from the new developments surrounding Exeter; a situation which will only worsen with the proposed new town at Clyst St Mary.

The **rural and agricultural economy** within Exmouth and its' hinterland, needs to be encouraged and supported by EDDC.

Allocation of agricultural land for 'development' (be it housing, commercial buildings or solar panels) is detrimental, at a time when there is an identified need to maximise food production within the UK.

Consultation process

A very poor presentation process in Exmouth - it was 'amateur' and shoddily produced - limiting residents the opportunity to study the proposals in depth.

The lack of printed copies of the plan available to the public is deplorable and assumes that all residents have access to the Internet, are happy to read off a screen or will incur significant costs (both financial and time) using home printers to read the proposals.

No consultation with Community groups, residents associations or, we understand, with the Town Council.

The Commonplace Consultation website is difficult to navigate, inadequate to cope with a detailed response and sometimes doesn't log the comments that have been entered.

We, along with other residents, have abandoned our attempts to submit feedback through the Commonplace Consultation website

Future information and consultation

There are only obscure references to consultation and community involvement going forward. EDDC needs to be transparent, accessible and concise re future stages of the emerging Plan and be more pro-active in engagement and issuing of time-lines

Exmouth Strategy

Exmouth as a Town is in urgent need of a strategy.

What is the Town?

What does the Town want to become?

What is needed to achieve it's aims?

The emerging Local Plan is putting the cart before the horse.

There is no need to forge ahead with the Plan, with robust plans already in situ.

EDDC should honour what is in place.

Graham & Elizabeth Deasy



13th January 2023