

Input to East Devon District Council on Draft Local Plan to 2040

To: Planning Policy, EDDC

From Don Mildenhall, Lypstone resident

(Address: [REDACTED])

General comment

I welcome the opportunity to comment in this public consultation. it's important to recognise the amount of work that has gone into the compilation of the draft plan. However, the plan has many very significant flaws, the most significant of which are addressed in my comments below.

Overall comments

*What is the **real** need for new housing?*

The total amount of housing and other development appears to be a further increase on that envisaged in the previous local plan (2013-2031). I understand that, at the time of the commissioning of this current draft plan, this increase was shaped by government policy and requirements. Since that date, these requirements have been modified and may be lower. It is certainly the case that very substantial developments in and around Exeter are producing tens of thousands of new houses. I fear that the total of all this development across multiple local authorities far exceeds the real need for homes. Additionally EDDC needs to control, limit or prevent new building being used as second homes / Airbnb.

Why is EDDC not leading on infrastructure development?

The total development envisaged will bring the infrastructure in the western part of East Devon to breaking point. Already roads, road junctions, water supply and sewerage, schools, surgeries and more are all very visibly becoming inadequate. Whilst responsibility for these may rest with Devon CC and others, there is no evidence of leadership from EDDC to support or provide a joined-up plan. East Devon has failed in recent and current cases to build infrastructure until long after completion of the development (e.g. no development of Cranbrook Town Centre, 10 years after start of housebuilding), meaning that undesired patterns of travel for work, shopping and entertainment have become established.

The approach of assessing development sites on an individual basis only (e.g. Policy 67) means that the cumulative and total impact of proposed development is not being properly assessed (e.g. by Devon Highways) for infrastructure needs.

Why such limited green initiatives?

The various policy elements in the draft plan which support green initiatives look to be too limited to achieve major change (in the face of clear evidence for such improvements as better cycle route provision). They also have a sense of being small 'add-ins' to the plan rather than being assembled, funded and driven forward as an integrated 'green policy'. Various consequences of major

developments work in the other direction – East Devon’s minor roads are visibly crumbling, with the edges of many lanes and minor roads (as used by cyclists) now dangerous.

Where is the provision for an ageing population?

The draft plan does little to make provision and support for East Devon’s large, still increasing and still ageing elderly population. It’s inevitable that there will be a strong demand for care homes, sheltered housing and small ‘retirement-ready’ houses. To support independent living as much as possible, it’s important that land allocations put development of this kind close to community facilities (shops, halls etc): this is in the power of EDDC but is not being applied.

Why is the problem of coastal erosion and rising sea levels being virtually ignored?

The draft plan does not face up directly enough, nor on an adequate scale, to the looming reality of coastal erosion and rising sea levels. It now seems inevitable that significant parts of Exmouth and other coastal areas will be inundated later in this century. The plan makes limited mention of rebuilding or moving individual dwellings, but what will be required is much greater. EDDC needs to start making ‘strategic allocations’ now to cope adequately in the future.

What is the basis for the rosy statements on job creation?

There is repeated mention of the creation of higher value jobs and whilst this is true around the Science Park, much recent development has been in lower paid and insecure work - distribution, logistics and similar – the number of delivery vans clogging our roads shows this clearly.

The draft plan makes excessively rosy statements which are then used as the basis for justifying high levels of development. For example, Honiton is described as well-connected, but there have been no improvements to the eastwards A30 and A35 and the rail service is limited and prone to the delays inherent in single track mainlines.

Comments particularly referencing Lypstone and A376 corridor

Why is EDDC using unscrutinised policy decisions as the basis for development?

Whilst this consultation process allows public input and review, the draft Local Plan is built on previous EDDC policy decisions which have *not* been subject to consultation and in at least one case appear to be wholly incorrect. As a Lypstone resident I am concerned and alarmed that Lypstone has been designated as a ‘Service Centre’ and that this is then used as the basis to allow a much greater level of development, including provision of industrial and commercial buildings as part of new development. Putting Lypstone on a par with, for example, Budleigh Salterton, is clearly wrong; Lypstone, with one shop and one part-time art gallery and no through roads lacks any reality as a ‘service centre’.

Why are the development goalposts being moved?

The intense pressure from developers and others for more development between Sandy Gate and Exmouth along the A376 corridor needs very careful management. It is very disappointing that the position agreed and documented in the previous local plan is being eroded and diluted. This affects Green Wedges (section 12.9), Coastal Protection areas (12.6) and more – the goalposts are visibly

being moved to allow more development. For example, Green Wedge land at Courtlands Cross which was the subject of a hard-fought application and rejection at appeal in 2012 is again shown, and being supported by EDDC, as suitable for development.

This approach in the draft plan disregards important elements of the Lympstone parish Neighbourhood Plan and Village Design Statement, both adopted by EDDC. (Section 6.20 refers). The past failure of EDDC to follow through on the extension of the village conservation area (15.12) is not addressed in this draft plan.

The proximity of various proposed sites around Lympstone looks attractive on 'sustainable development' grounds because of their proximity to the A376, but will create dormitory areas rather than genuine village extensions. As Lympstone is not a 'service centre', there is little incentive for new residents to go into the village along narrow, increasingly congested roads to access the few facilities.

Village facilities in Lympstone (notably the village primary school which sits on a very constrained site and is very close to capacity, and the village car park) are simply not able to accommodate more users – and this has led and would lead to large levels of extra peak hour and other loading on village roads.

The numerical allocations for Lympstone (Sections 6.85 & 6.91) describe these proposed numbers as 'low to moderate growth', whilst as percentages on the current village size, 'huge' is the honest term for a one-third expansion over the plan period and would be most unwelcome.

I think a maximum number of additional houses in the parish (excluding current build at Goodmores) should be limited to 50. I have made comments about individual sites separately.

A major new settlement - a planned, organised new community rather than piecemeal, destructive, scrappy development add-ons

More generally, I absolutely dispute and deplore the policy of adding large-scale housing developments to existing modest-sized villages. These new developments swamp the existing, damage communities by overloading services and dilute the many good things about rural and village life. Better, I strongly feel, to build a second new settlement closer to city facilities and employment areas and with the ability to provide 'right-sized' infrastructure from the start, near to further job creation possibilities. I appreciate that putting a higher proportion of required growth means a slightly larger new settlement, but that is less bad than permanent damage to many villages. Perhaps best to, upfront, call it a 'new town'.

In summary. the current draft plan is based on a flawed strategy that promotes unsustainable growth in inappropriate locations.

Don Mildenhall

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