

**From:**  
**Subject:**

Planning Policy  
FW: Proposed East Devon Local Plan

Dear Mr Allen,

I understand that in your capacity as Chair of the EDDC Scrutiny Committee you have asked for comments on the proposed EDDC Local Plan to be directed to the Committee.

I have a number of these as outlined below. I am a resident of Exmouth & so necessarily many of my comments are concerned with the town & its environs.

Section 3.1 (Pg 13):

Housing Secretary, Michael Gove, has recently stated that the UK government intends to abandon its current target to build 300,000 new homes every year. Housing targets for local authorities will be deemed advisory, rather than mandatory. Gove's department has stated that "Housing targets remain an important part of the planning system and the government will consult on how these can better take account of local density", implying that there will be much more flexibility going forward for EDDC to implement more effective targets for new builds that are driven by local demand. I respectfully suggest that this dramatic U-turn in UK housing policy means that EDDC's proposed Local Plan is redundant even before the consultation process has run its course. Surely this must mean that the Plan needs to be taken back to EDDC's drawing board?

Section 3.2 (Pg 13):

The intention of the Plan is to focus housing development within or very close to the major conurbations (Exeter & Exmouth) already existing within East Devon, on the basis that these have much of the infrastructure & jobs in place needed to support the added population burden. However, there are serious downsides to this housing distribution strategy: it does not help people maintain roots within their own communities or help family generations to live close together, which these days is essential for child care provision reasons. In addition, uprooting people, albeit indirectly, from their natural communities may inadvertently increase conventional travel demand within the county, with an inevitable detrimental impact on carbon-based emissions. Whilst this general strategy for development is eminently understandable, I believe that the emphasis in the Plan has swung too far in this direction & that more development needs to be accommodated within local centres & service villages within the region to cope with indigenous housing demand.

Section 3.5 (Pg 14)

Exmouth is acknowledged as the principal centre of East Devon. A stated aim of the plan is to focus development on the town but there is insufficient provision in it to address

the existing severe constraints on local infrastructure, by which I mean GPs, dentists, schools, shops, recreational facilities, roads, storm water management & sewage treatment, apart from a vague commitment (Section 17.3, P299) to "undertake detailed assessment of infrastructure needs & how we plan for provision". Exmouth's Neighbourhood Plan (2019) highlighted concerns that infrastructure provision in the town has not kept pace with housing development & nothing has changed since that time. This Local Plan will only make matters worse.

Section 6.11 (Pg 68):

"Land on the north-eastern side of Exmouth is proposed for a mixed-use development to provide around 258 new homes and 1 hectare of employment land. Development of these sites will be dependent upon provision of new and safe pedestrian and cycle crossings for this road." Unfortunately, both this development & that of nearby Douglas Gardens (44 new homes) will encroach into existing green spaces. It is critical that green corridors between these spaces are kept open for wildlife if these new builds proceed, & that local infrastructure is suitably upgraded to cope with the town's increased population.

Section 6.14 (Pg 70):

EDDC acknowledges in the proposed Plan that tourism forms an important part of the town's economy. The council should therefore be taking steps – through much higher council tax or any other means - to minimise the number of these proposed new builds that will end up as 2nd or holiday homes for people domiciled away from Exmouth.

Section 6.15 (Pg 70):

The Plan states that "Exmouth is very well supplied with services and facilities with a large secondary school and primary schools, a variety of shops, sports facilities, a library, GP, hospital, railway station and regular bus services." However, any right-minded resident of the town knows that this is patently untrue with long waiting lists for NHS dentists, difficulty in getting GP appointments, and with retail facilities in the town centre dying a slow death (only very recently M&Co in the Magnolia Centre has announced that it is going into liquidation). The town's shopping offering is now overly focussed on coffee & charity shops & fast food outlets. This lack of adequate retail infrastructure needs to be addressed as a matter of urgency before any new major housing development is allowed in & around Exmouth.

Section 6.18 (Pg 71):

The Exmouth Neighbourhood Plan (2019) places protection of the natural environment, including the setting of green corridors, networks and green spaces in built-up areas, as a top priority & also highlights concerns that infrastructure provision in the town has not kept pace with housing development. Valued green areas include the proposed Littleham/Maer Valley Park, in which two sites are being earmarked for housing allocation (wholly or in part). This issue of maintaining green spaces & preserving nature, as highlighted in the Neighbourhood Plan, should be respected in full.

Section 6.23 (Pg 71):

As the proposed Plan acknowledges, scope for development at Exmouth, specifically including any outward expansion, will see development set some distance from the town centre services and facilities but close to nationally important environmental assets. The built-up eastern edges of the town are mostly elevated and close to the E. Devon AONB & on the north-eastern side of the town is the important biodiverse Pebblebed Heaths. The western side of Exmouth is flanked by the Exe Estuary which is designated in the highest tier of wildlife sites, and bounded by an eroding coastline. It is crucial therefore that any new housing development must be sympathetic to the needs of these acknowledged nationally important "natural assets", whose preservation in their entirety must be placed ahead of the region's new housing needs.

#### Section 7.35 (Pg 141):

None of the proposed new housing developments in the Plan should go forward unless SWW can provide EDDC with categorical assurance that the increased number of connections into their household waste management systems will not result in increased discharges of sewage into any of the county's rivers or coastal waters. A water quality, sewage treatment & runoff management study must be a key requirement for site allocations, & also accounted for in planning decisions.

#### Section 8 (Pg 151):

A ratio of affordable housing builds of 35% outside of Cranbrook is stated. EDDC needs to write specific measures & commitments into the Plan to ensure that this level of affordable housing build is actually delivered. As we all know only too well, this level has rarely been achieved in East Devon within mixed communities because of developer constraints & back-tracking. Many more affordable homes need to be built to provide local places where our young people can live well & independently.

#### Section 9.60 (Pg 210):

It is stated that "The Local Plan provides a positive strategy for the future development of town centres and their health is regularly monitored to ensure that, if evidence suggests that they are in decline, the Council is able to implement further measures, along with relevant stakeholders, to support their vitality and viability." What are these measures, when was the "health" of Exmouth town centre last monitored & reported to ETC & when will these measures be implemented for a town that is patently in decline?

#### Section 11.2 (Pg 226):

It is stated that "Exmouth, Honiton, Seaton and Ottery St Mary all have bespoke bus services that travel around these towns, and there are several high frequency bus routes linking East Devon settlements to Exeter. There are also some high quality active travel corridors, notably the Exe Estuary Trail and the proposed Clyst Valley Trail." The #57 bus service from Exmouth-Exeter, plus other bus services that support the town, were cut by 50% with the onset of the Covid19 pandemic & have not been reinstated, & so I suggest that it should not now be referred to as "high frequency". Further investment in public transport, in particular more frequent bus services on the busy Exmouth-Exeter route, is critical for supporting people whose jobs lie outside of Exmouth, & for helping to achieve DCC's carbon net-zero aspirations. With the pandemic many folk have unfortunately reverted to cars as their primary mode of transport which is a lost opportunity for DCC. There is a clear need to establish more active travel & sustainable

transport options within the town, in particular creation of new sections that can link together existing cycle paths & walkways.

Section 15 (Pg 288):

Proposals for new development must be sensitively designed and not cause harm to the historic environment. We should not be enabling historic towns & villages to merge with one another, as will happen if the green wedge between Lymington & Exmouth continues to be eroded.

General comment:

I suggest that it will be advantageous within East Devon to implement a region-wide 20s-Plenty scheme. A 20mph traffic speed limit brings many benefits to a locality & is known to rank top for cost-effectiveness among urban & village traffic management options. The cost of traffic infrastructure is largely the cost of driving at speed and is not the costs of cycling and walking. Over a wide area a 20mph speed limit benefits all road users and the entire community: traffic casualties fall 20% [1], noise almost halves and use of active travel by residents rises. Climate, safety, active travel, place-making, the economy and quality of life are all helped. More & more of these schemes are being introduced successfully around the UK & East Devon should be playing their part.

[1] [http://www.20splenty.org/20mph\\_casualty\\_reduction](http://www.20splenty.org/20mph_casualty_reduction)

Yours sincerely,

David Buller (Dr)