

COMMENTS ON BEHALF OF THE OTTER VALLEY ASSOCIATION ON EAST DEVON'S EMERGING LOCAL PLAN 2020-2040

The Consultation draft of the emerging Local Plan is an ambitious document, addressing very important and urgent issues facing the District over the next 20 years. These issues affect us all, as they concern our health and well-being, which is inextricably linked to our environment.

The plan follows the National Planning Policy Framework 2021, with which it is required to comply. However, there are a number of issues where much more robust policies should be pursued, which would be more in line with National Planning Policy Framework and the Guidance 2021.

Spatial Strategy and housing numbers

The recent statement of Michael Gove on housing numbers should be followed up. He commented that communities should be able to push back against large scale housing targets near to Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest and green belt land, whilst at the same time stressing that the Government was sticking with its plan for 300,000 new homes by the middle of this decade. East Devon's future housing land provision is extremely compromised by two thirds of the District being covered by two AONBs, and the many other protected designations. In addition we have already had a larger increase in population (13% compared to the average of 6%) in the last 10 years, so there is a very strong argument for a significant reduction in mandatory housing numbers. We also need to argue for a reduction, based on the beautiful rural nature of our district and the potential for harm to the very features that make our district so attractive. Another concern is the loss of good grade agricultural land, which is needed for the production of our food. This land is finite, so development should be restricted to the lowest grade of agricultural land.

We agree with the hierarchy of settlements, and the proposal for a new town to take the bulk of the development. The first choice of new settlement is a much better location with access, via the A30 as well as the A3052, to the M5. We do not favour option 2 which would increase traffic in the historic village of Newton Poppleford, and add to the congestion on the A3052. The fact that there is no railway link is a serious problem, and will increase congestion significantly in the area. In addition, J29 and J30 of M5 will be compromised by these new settlements, and J30 even more so by the proposal for an urban extension to the north of Topsham. This housing site North of Topsham is right next to the M5 and is unsuitable due to very high noise levels. The proposed Gypsy site is similarly unsuitable because noise from motorways normally exceeds World Health noise limits for human habitation.

Regarding Tier 3 and 4 settlements, many are historic villages, so may be difficult to accommodate housing numbers sensitively within their boundaries whilst not eroding the rural character of the surrounding countryside. Retaining local character and distinctiveness is a vital element in the areas' attractiveness. It also seems unfair that some settlements will

have to take much more housing than others, so a 5 - 10% increase for all would be more equitable.

We agree with small site development to encourage smaller builders, including parcelling larger sites to discourage the monopoly of volume builders, and apply this to the new town and larger developments. However, this can make securing sufficient affordable housing problematic.

Affordable housing for locals

Most residents would support more housing that is for locals, and is affordable, but the targets should be increased. There is no mention of housing for essential local workers, who may move into the area to provide vital services. Local housing for the elderly is addressed in Policy 41. But there is no mention of housing for older people wishing to downsize, but stay in their village. This should be a requirement. Smaller, adapted or specially designed houses are preferred over large apartment blocks. What must be addressed now before the situation gets any worse is the lack of affordable rental homes for essential and other local workers. The housing imbalance caused by second homes and 'airbnb' is a very serious problem. It is also damaging the communities in some of our loveliest and most popular villages.

Design

We think there should be more emphasis on the value and benefits of good design, especially the growing evidence on the influence of design in the built environment on physical and mental health and well-being. Paragraphs 126 to 134 in the NPPF could be used to strengthen the design policies in the Plan. The OVA would like to see a more proactive and collaborative approach, which will engage with local communities effectively. Chapter 10 appears to be rather weak, as good design is such a fundamental planning issue. More could be made of best practice on the health benefits of good design of our neighbourhoods, homes, places of work, streets and open spaces.

Sustainable tourism

We have concerns about the thrust of Policy 60, because aiming to be the leading destination for year round tourism could actually harm the outstanding environment that tourists come to enjoy.

Sustainable travel

With regard to sustainable travel, more robust policies are required to reduce congestion and require travel plans, working with the County Council. Much could be achieved to increase and enhance walking and cycling around the District, if the many narrow 'back lanes' were properly restricted for access only, with actually physical barriers at strategic

points. This would prevent rat running, and create much safer roads for these activities. Whilst this is a matter for the County Council, it should be encouraged by the District as a way of improving health and sustainable travel.

The natural environment

We commend the use of an energy hierarchy and the policies on renewable energy and zero carbon. The aim to be carbon neutral by 2040 is ambitious. Whilst solar farms are the most energy efficient, use of all new roofs for solar power should be a requirement. Also retrofitting large industrial and employment buildings would help to protect the best agricultural land needed for food production.

All the policies in Chapters 11, 12 and 13 are very important, as it is essential to protect and enhance the World Heritage site and all our outstanding landscapes, biodiversity and geodiversity. We also welcome the Council's vision for sustainable tourism and net zero.

Heritage

We welcome the strong heritage policies, but there is no mention of the Guide to the Listing of Local Heritage Assets, or the adopted East Devon Local List (of non-designated heritage assets). The latter was noted under policy EN8 in the current LP and the Local List (of non-designated heritage assets) and was produced as an action of the adopted Heritage Strategy. We would suggest that **Policy 102** could refer to the actual East Devon Local List of non-designated heritage assets.

The adopted Guide is intended to help local communities identify and assess features of character with a local heritage value. This allows for nominations to be made by through parish or town councils, local organisations or ward members. There is no mention of involving communities outside of neighbourhood plans, but the Heritage Strategy Action Plan advocates working in partnership with local communities.

More could be said about the holistic nature (social, economic and environmental) and benefits of heritage assets, working in partnership to help achieve these benefits. For example, the contribution of heritage assets to local distinctiveness and to the vitality of town centres.

Conclusion

We realise that much more work is still needed to be done on this new Local Plan, but have welcomed the opportunity to comment on this emerging document.

We hope that the Members will approach Government with a strong case for reducing the mandatory housing numbers, based on the Council's own assessment of housing need over the next 20 years. The housing numbers need to be credible and achievable.