

Upottery Parish Council

Parish Clerk: Mrs Kerry Kennell, [REDACTED]
[REDACTED]

Cllr. Paul Arnott,
Leader, East Devon District Council & EDDC Strategic Planning Committee member.

Cllr Dan Ledger,
EDDC Portfolio Holder, Sustainable Homes and Communities & Chairman, Strategic Planning Committee.

Mr Ed Freeman,
Service Lead, Planning Strategy and Development Management, EDDC.

Blackdown House Border Road, Honiton
EX14 1EJ

January 13, 2023

East Devon Local Plan 2020 to 2040 - Consultation Response.

Upottery Parish (including the villages of Upottery, Rawridge and Smeatharpe) is a thriving community on the A303/A30 north of Honiton. The Local Plan to 2040 which you put out to consultation November 7, 2022 until January 15, 2023 declares Upottery to be unsustainable.

The draft Local Plan states that all areas apart from 'sustainable' settlements will be treated as if they were open farmland when it comes to development. This has serious consequences for us and does not meet the needs of our community nor the wishes of the majority of our parishioners. While we would not wish to permit large developments that would change the character of the Parish and adversely affect the Blackdown Hills Area of Outstanding Natural Beauty, the Parish will need some planned growth if it is to continue thriving as it has for the last 200 years.

We call on you to amend the local plan to reflect the intention to conduct modest development in our community. This would align with the CLA's recommended best practice of promoting organic growth in settlements of fewer than 3000 inhabitants,¹ and a suitable HELAA site has already been identified in Upottery village.

There currently appears to be no middle ground between settlements deemed 'sustainable' which all seem to allow large-scale development, and 'unsustainable'

¹ CLA Paper ["Sustainable Communities – The Role of Housing in Strengthening the Rural Economy"](#), March 2002.

settlements treated as though they were open farmland. We believe this is an unnecessarily binary approach that creates a vicious cycle of settlements such as

ours that are deemed unsustainable being denied the opportunity to organically grow and maintain their local services and facilities.

We also have some serious concerns over the effectiveness of the process by which the Local Plan has been developed and the associated consultation process. Our detailed concerns are laid out in appendices to this letter, but in brief:

- In developing the process for determining the settlement hierarchy and in making that determination, you did not consult with parish councils or the local settlements.
- The scoring system attaches undue weight to less significant facilities such as libraries or whether a post office is in a shop, and fails to account sufficiently for more relevant factors such as schools, broadband speed etc.
- The Commonplace consultation questionnaire only allows East Devon taxpayers to comment on your preferred development sites but not on alternative sites or the process of determining suitability. We are writing this letter because there is no way to voice our concerns, which we believe are valid, through this consultation mechanism.

We look forward to your response.

Sincerely,

Graham Long

Graham Long, Chairman

Endorsed by Upottery Parish Council

Appendices:

1. Detailed Comments on Determining Suitability.
2. Detailed Comments on Effective Consultation.

1. Determining sustainability

You have determined which settlements are Tier 4 sustainable by counting the number of facilities/services offered by a settlement such that having seven or more makes a settlement sustainable. All settlements having less than seven facilities/services are deemed unsustainable. Using this tick-box methodology in which there is no weighting of different facilities/services, you have given Upottery a score of 6. This is misleading:

- By having a “*less than hourly bus service*” a settlement scores 1. So a once a week bus service has the same significance as a primary school does, in making a settlement sustainable? This is illogical.
- Whilst Upottery does not have a stand-alone shop, our pub, The Sidmouth Arms, began selling food and other necessities during the pandemic and continues to do so today. A thriving community shop also operates in the neighbouring Somerset village of Churchinford, 2 miles away, where residents of Upottery give their time for free to keep it running. The availability of hyperfast full-fibre broadband provides everyone with access to home deliveries from all the major supermarkets.
- Whilst a once-a-week bus service adds a sustainability score of 1, you do not give a score of 1 for the once a week post office, which operates each Wednesday in Upottery Manor Rooms.
- For reasons we fail to understand, you add a sustainability score of 1 for any settlement that has a Library. Not one of the Tier 4 settlements in the Plan has a Library! Today, and in the future, the Internet removes the need for a village library.
- Version 2 of the “*Role and Functions of Settlements*” paper gives a sustainability score of 1 for an “*open space / allotment*” in a settlement. For some reason this was increased to 2 in Version 3 of the paper by allocating a score of 1 for each of an “*allotment*” and “*a sports playing pitch*”. Upottery has a thriving parish allotment, but no sustainability score is given for it. It just happens to be Smeatharpe, not Upottery (donated by Lord Sidmouth in 1855) and is used by people from across the Parish.
- In their report “*Sustainable Communities – The Role of Housing In Strengthening the Rural Economy*”, published March 2022, the CLA recommends that “*greater emphasis be placed on digital connectivity in recognition of the services that can be accessed online*”. Yet you give no score for digital connectivity to communities like Upottery where residents have access to Hyperfast full fibre broadband, whilst you still give a score of 1 to any Tier 4 settlement were it to have a library! This is meant to be a Local

Plan up to 2040, not up to 1940! In the Role and Functions paper you list settlements that have Superfast (+30Mbps) and Ultrafast (+300Mbps) broadband, but you fail to acknowledge that all three villages in Upottery parish have access to Hyperfast (+500Mbps) broadband. Twenty years ago

we all went online via dial up. Upottery already has access to +900Mbps broadband which everyone will need in 2040.

Were you to adjust your facility/services scores for Upottery to recognise these corrections (shop in pub, once a week post office, allotments, Hyperfast broadband), there is every argument, that the sustainability score for Upottery should be 10, not 6, putting Upottery in the Tier 4, sustainable category.

It has been confirmed to us that prior to going out to consultation on the Local Plan to 2040, your scoring of sustainability was a tick-box, desk exercise and that you have not consulted with any of the settlements you have put in the sustainable/unsustainable categories in this way. Had you spoken to East Devon parish councils first, you may have produced more accurate/meaningful sustainability scores. It is clear that mistakes have been made. For instance in V2 of the Role and Functions of Settlements paper you give Broadhembury a score of 1 for an open space / allotment, which does not exist. This has been corrected in V3.

In the absence of consultation with East Devon parishes, applying the Settlement Hierarchy as you have, makes sustainability appear a black and white issue... 7 or more is sustainable and anything less is unsustainable. All settlements will have their own quirks/anomalies that enable them to thrive and you owe it to your taxpayers to recognise this. If you don't recognise this, the Local Plan to 2040 will suffer major credibility issues with those of us who live in East Devon.

The Settlement Hierarchy is the key determinant in deciding which settlements are deemed sustainable and which are deemed unsustainable and there has been sympathy amongst members of the EDDC Strategic Planning Committee for Upottery being deemed unsustainable. Mr Freeman has however stated that were Upottery to be deemed sustainable, in Tier 4, then to "*preserve the consistency of the Settlement Hierarchy model*", Colyford, Rockbeare and Woodbury Salterton would also "*have to be moved to Tier 4*". That is never going to happen, because:

- Rockbeare doesn't want more development, being adjacent to the existing new town of Cranbrook and development planned around Exeter Airport.
- Woodbury Salterton doesn't want additional development being adjacent to planned Tier 3 development in Woodbury and the planned second new town south of the A30.
- Colyford doesn't want more development being adjacent to identified Tier 3 development sites in Colyton.

Rather than determining the future of East Devon by rigidly applying a theoretical model that is the Settlement Hierarchy without consulting communities/parishes, the

Local Plan to 2040 would be more credible if it recognised what makes existing settlements tick, why they survive and thrive and why they need limited additional development to continue doing so for the next 20 years.

2. Effective consultation.

The credibility of the Local Plan is one thing but the way you have chosen to consult with your taxpayers is another. No matter what you call it, the Commonplace website is a huge questionnaire (actually it is 18 separate questionnaires plus a 19th quicky questionnaire). Most people find this daunting and after answering the first few questions never want to see a smiling or sad emoji again. The Local Plan is too important to be reduced to emojis because it has “*a bearing on the lives of everyone in East Devon*” for the next 20 years, as stated by Ed Freeman, November 24, 2022.

- The consultation is selective – it only elicits comment on EDDC’s preferred development options. Only HELAA sites that are EDDC’s preferred options (plus another new town) are shown on the consultation map. Most EDDC taxpayers will never know that there are many additional potential development sites that EDDC have decided are unsustainable.
- The consultation questionnaire is assumptive, designed to confirm that EDDC’s preferred development options are the only ones possible. That is not the case, as the CLA recommends in their paper:

Published in March 2022, the CLA paper “*Sustainable Communities – The Role of Housing in Strengthening the Rural Economy*”, makes five recommendation. Amongst the recommendations the paper states as follows:

- *....promote organic growth in settlements of fewer than 3,000 inhabitants which would lead to a small number of houses in a large number of villages.*
- *....place greater emphasis on digital connectivity in recognition of the services that can be accessed online and to assess which services could be supported if development were enabled.*
- *....undertake a housing needs assessment across all rural settlements so that identified local need can be met at a local level.*

The CLA paper is readily [available online](#), but EDDC does not appear to have taken onboard any of their five recommendation in writing the Local Plan to 2040.

Because the Commonplace questionnaires do not enable comments on development other than in EDDC preferred locations, Upottery Parish Council have chosen to give you their feedback on the Local Plan to 2040 via this letter. We ask you to reconsider how you have “pigeonholed” our community as unsustainable and re-score Upottery on sustainability as indicated above.

The Local Plan to 2040 will be used by organisations planning investment in East Devon over the next 20 years, when they estimate which communities will grow and which will stagnate or decline. It is not be just a plan for EDDC to use when deciding planning applications. DCC will use it to decide on road investments. Bus companies will use it when deciding which routes to invest in and which to remove. The Department for Education will use it when deciding which primary schools should grow and which should close. Commercial retail hospitality businesses will use it when deciding where to invest limited capital and grow their investment because the Local Plan to 2040 forecasts a growing population.

If Upottery is condemned as unsustainable we have major fears for our future and in particular, our village school, our village pub and our bus service. Must young people be forced to move away as they grow up? Please allow modest growth to take place in Upottery as would be enabled by allowing development of the 2017 HELAA site, Upot_01. This was the strong view of a Public Meeting held in Upottery last week.