

14th January 2023



Dear Sirs

RE: Response to Consultation on –

1. East Devon Local Plan 2020-2040 Preferred Options Reg. 18 consultation draft, November 2022
2. East Devon Local Plan 2020-2040 – Preferred Options consultation draft **Sustainability Appraisal report**, November 2022

I am writing in response to the consultation on the above.

1. The issues with building a new town

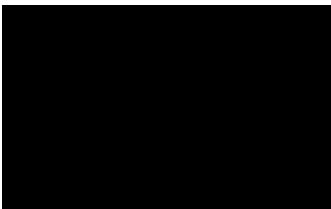
1. Surely in the light of Teresa Villiers amendment, the housing targets will no longer be mandatory and EDDC could take a more locally focussed view of the housing needs. In any event the targets should be coming down as the economy has underperformed.
2. On page 221 of the Sustainability Appraisal it states that there is no reasonable alternative to a new town. Although evaluation of a variety of towns and villages has been conducted, there is no such assessment for spreading housing across all settlements as far as possible including Cranbrook and NOT building a new town. There would seem to be easily enough land availability from the HELAA.
3. There is no plan for the new town in its own right as there was with Cranbrook. This could mean that the 2,500 houses are built initially by 2040 and then the development is stopped after changes in Government change the rules again.
4. There is NO infrastructure planned for the first 2,500 houses. This can't be right? If the rest are not developed then 2,500 households would ALL commute to work and to shop. The environmental impact on carbon would be the worst case since building the services is a key part of reducing carbon. Without these no local journeys would be made!!
5. A new town takes decades to deliver as only a few large developers would be involved and delivery rates for new home completions will be lower as a consequence – especially in early 5 years of the plan. A larger number of developers would be involved in a 'dispersed' approach which would allow faster buildout rates.

2. Option 1 and Option 3 issues

1. Travel is unlikely to be sustainable as there are no train services other than Cranbrook, Newcourt, Exton and Topsham. All of these lack parking for cars and bikes. In any event, it is 2.5-3 Km to these and the interconnections are along country lanes, crossing fast roads etc. Practically a car is the only option for the whole journey for all but the most dedicated cyclist or public transport user.
2. The Sustainability Appraisal includes Health & Wellbeing. There is no assessment of this for the rest of the East Devon residents particularly if the Option 1 site is limited to the initial 2,500 dwellings.
3. The mitigation measures in the Sustainability Assessment do not mention any improvements to either Junction 29 or 30 of the M5 and the Clyst St mary roundabout. As anyone who uses this road network regularly knows it is already at standstill during the daily commute. Even 2,500 houses would generate a massive increase to the loading on the above and this would need to be done prior to occupation.
4. On page 232 of the draft Sustainability Appraisal Report it looks at “reasons for alternatives being preferred or rejected” stating Option 1 is preferred as there is greater certainty of delivery. So has this been preferred because it is controlled by a small number of developers? Cheaper for the developers and cheaper for the Council but not optimised for the East Devon residents!!
5. Regarding the proposed Energy from Waste plant at Hill Barton, this is not really low-carbon. Given the issues locally with biodigester operators unbalancing the benefit by expanding production irresponsibly to focus on profits and creating a worse carbon environment for local residents, the same could happen with the Energy from Waste scheme.

I trust this will be taken into account as part of your consultation.

Yours faithfully



Chris Booker