

## EXETER CIVIC SOCIETY RESPONSE TO EAST DEVON PLAN

Our main interest in the plan is its impact on Exeter and its surrounding environment. Our concerns therefore focus on the plan's emphasis on developing the western side of East Devon (Spatial Strategy, point 1, 3.1).

We understand the arguments in the plan for this but it is also clear that it will bring problems that are not properly mitigated or addressed in the plan. **The following summarises our concerns with the individual points considered in further detail below:**

- **The expansion of Cranbrook, although not considered in the plan, and the proposed adjacent new town will put significant pressure on Exeter facilities but seem to be planned largely in isolation from it.**
- **The further development of towns and villages up the line of the Exe estuary when they are ill equipped to deal with the consequences and the fact that this development will threaten their character.**
- **The concentration of employment opportunities for East Devon residents in and around Exeter. At the same time Exeter's own draft outline plan implies loss of employment land at, for example, Marsh Barton, and Teignbridge's development greatly increases the number of houses to the west of Exeter without complementary employment land. Although growth cannot be guaranteed, there is a serious question about whether the different plans for employment and employment land are coherent.**
- **The consequential increase in traffic when the plan recognises that there can already be significant congestion, for example on the A376 between Exmouth and Exeter. There will continue to be significant and potentially increased commuting from places such as Honiton and Ottery St Mary.**

### **Cranbrook and the proposed new town**

#### *Cranbrook*

We understand that the draft plan does not include Cranbrook as a separate one was accepted for it earlier in 2022. However, we think **it would be helpful for the reader if future iterations of the plan could at least include in the relevant maps the proposed Blue Hayes extension of Cranbrook to the west and the development of Treasbere Garden Village south of the B3174 for which there is already a planning application.**

**The draft plan also sought views (para 3.7) on whether some of the policies of the draft plan should be applied to the Cranbrook plan where the relevant issue is not already covered. We consider that they should be applied so that standards and requirements in Cranbrook do not lag behind those elsewhere in East Devon.** For example, the requirements in Strategic Policy 28 for net-

zero carbon emissions for all new residential or commercial developments should apply in Cranbrook if they do not do so already given the importance of climate change in the draft plan's thinking. Similarly, the requirements for affordable housing (Strategic Policy 40) should apply. As should the proposed application of design requirements (Strategic Policy 62) and national space standards, particularly as the plan notes that only 29 per cent of new buildings in East Devon are meeting the gross internal floor area standard with far fewer homes achieving the other requirements and that, as a consequence, these dwellings may not be providing enough internal space for ordinary day to day activities. **The plan notes that the viability of Cranbrook (and indeed other developments) should come before application of these standards. We disagree. It would be perverse if the result is indisputably inadequate homes which don't serve the wider public interest on matters such as climate change and affordable housing.**

#### *Proposed New Town*

**We object to the proposed new town.**

Strategic Policy 8 sets out the framework for the new town of some 8000 houses of which some 2500 are expected to be built by 2040. The justification for the policy in chapter 5 is weak and does not answer the kind of points posed in our letter of 15 March 2021.

**The new town will require substantial infrastructure to make it a genuine '20 minute neighbourhood' and make it unnecessary for people to travel to Exeter, or elsewhere. This is very unlikely to be provided in a reasonable timescale.** Local shops, GP surgery, swimming pool, community centre, garages, supermarkets, sports centre (cannot rely on a school) etc, similar to those found in Honiton, will all be required. If the town expands to 8,000 homes this could result in 19,200 people living there. Honiton has a 2021 population of 11,600 and has all of the facilities listed above.

Despite the intentions set out in the policy, experience with Cranbrook suggests it will be many years before the necessary services as well as efficient and reliable public transport will be available. In the meantime, residents will be substantially reliant on their cars and services outside the settlement. This includes commuting to Exeter. We welcome the allocation of employment land if the town is to be built and the wider employment land development around Exeter Airport and the Science Park which may mitigate this. Even so patterns will be set by 2040 and it is clear from the Cranbrook experience that substantial numbers will continue to commute.

**A preferable strategy as outlined in our letter would be to distribute the 2500 houses to 2040 more widely amongst the towns in East Devon. This would have the advantage of perhaps enabling faster build given the infrastructure required for a new town. It would also give the residents ready access to existing services which would also benefit the towns economically. This would be a more sustainable approach.**

Given the reduction in the working age population across more than half of the wards in East Devon, the balancing act should not be seen in a new town in the vicinity of Exeter (3.47), but rather an approach that is decentralised as far as possible, so existing towns can benefit. This would also be a better way of 'levelling up' (3.43). Increasing the vitality of existing town centres throughout East Devon is a very welcome general aim of the Plan, but we feel these policies need to be revisited in the light of NOT planning for a new town. A different starting point for the future development of East Devon will help spread wealth and opportunities more widely across the whole of East Devon, thus resulting in less commuting, lower accommodation density and higher life quality.

**We think that building on the success of the Enterprise Zone (in the vicinity of the airport) should be supported by the further planned development of Cranbrook and not need residential support from a new town (Policy 9, 5.17).** A focus like this would provide the shortest possible commuter routes and keep enterprise and residential dwelling as close together as possible, so following the general idea of 'mixed-use' developments.

**The policy notes that east Devon will be 'working with partners' on the development of the new town. If it is to go ahead, we consider a stronger commitment should be made to joint working.** The policy on development north of Topsham (Strategic Policy 17) has a much stronger and more explicit commitment to joint working with Exeter. We consider a similar commitment should be made here. Although the proposed Topsham development is against East Devon/Exeter boundary, the Cranbrook experience leaves no doubt that residents of the new town would be making extensive use of facilities in Exeter. This includes NHS services, especially diagnostic facilities and hospitals in Exeter (not mentioned in 5.8 and policy 8). **It would be helpful if there could be a requirement for the development to include an assessment of the impact on NHS services and how the cost of such impact should be met.**

#### **Proposed development north of Topsham and along the Exe estuary**

**Our objections here are:**

- **The developments at Topsham, Exton and Lypstone would threaten or impinge on the 'green wedge' or the rural aspects of land to the east of the villages and adversely affect their character.**
- **The proposals fly in the face of neighbourhood plans. The policies proposed do not address or offer any mitigation of the issues raised in the Neighbourhood Plans. What is the point of these plans if they are then ignored?**
- **They would further add to traffic on the A376 (or in the case of Topsham use a narrow road which emerges close to the Junction 30 on the M5) which as the draft plan notes is already subject to serious congestion.**

The **Topsham** proposal sees the site's abutment with Exeter's own development as an advantage and that a larger development might be possible if Exeter and East Devon combined their planning. **We have opposed the developments along Newcourt Road included as part of Exeter's draft outline plan. We consider East Devon's proposed Topsham development puts further unacceptable pressure on Topsham facilities. It would also significantly increase traffic along the Topsham Road into Exeter** unless there was a major improvement to public transport which is very unlikely based on current experience. These effects would be even more acute and unwanted with a larger development.

For **Exmouth** the plan proposes significant development. Additional local employment space is likely to be welcome. However, **the proposal for some 1000 extra houses needs to be rethought.** The sites selected impinge on the 'green wedge' at Lypstone and further reduce the gap between Lypstone and Exmouth. They are also situated a long way from the town centre and its facilities which the plan notes already causes problems for existing residents who are nearer to the centre than the proposed sites. The plan implies ever greater car dependence for Exmouth residents, contrary to East Devon's ambitions in respect of climate change.

**Overall, we consider that the proposals for substantial development along the Exe estuary (including to the north of Topsham and in Exmouth) need to be rethought and significantly scaled back for the reasons given above.**

## **Employment**

In our letter of 15 March 2021, we asked that East Devon identify more employment sites to enable more people to work in their local town or area. We are pleased to see that the draft plan does this, explicitly linking housing development to increases in employment land. We also support the council's intention to resist loss of employment land and its strategic policy to achieve this. **We consider this approach should be further strengthened by a policy that limits housing development if additional employment land is not developed in parallel.**

We are also pleased to see that East Devon is working with Exeter, Mid-Devon, and Teignbridge Councils to produce an Economic Development Needs Assessment for the greater Exeter area in 2023. We look forward to its publication. A critical issue from our perspective will be an assessment of whether the extra employment land will be sufficient to accommodate the additional jobs required and whether its siting will be suitable and minimise commuting.

## **Sustainable transport**

The policies in the Sustainable Transport chapter have some notable and laudable aspects – for example new developments incorporating the features of a '20 minute neighbourhood', and provision of electric charging points for all new residential developments. The chapter also refers to high quality public transport, for example in Strategic Policy 45. However, **it is clear that the plan overall will result in significant additional traffic, leading to pollution and congestion particularly at the western edge of the district and in Exeter itself. This is directly contrary to East Devon's ambitions for net-zero carbon emissions.**

The plan notes that in 2019 East Devon's CO2 emissions from road transport were more than one-third of its total CO2 emissions (para 11.16) compared with one fifth nationally. Rurality is of course a factor here but so too is the way housing and employment land has been sited. **The proposals in the plan for housing and employment land development are unlikely to lead to a reduction either absolutely or proportionally in transport CO2 emissions and will much more likely increase them.** This is because:

- The plan requires 1.6 parking spaces for each new or replacement house and so emphasises and assumes car travel will be the norm.
- Many CO2 emitting cars will be on the road after the 2030 government deadline.
- Cranbrook's experience (where the town centre is acknowledged in the plan to be still embryonic) is likely to be repeated in the proposed new town with residents dependent on cars and not able to enjoy a 20 minute neighbourhood for many years.
- The developments along the Exe estuary will mostly be car dependent to access services and work, including in Exmouth.
- Public transport, however 'high quality', will not provide a suitable alternative to cars for many if they are required to commute to work. There will never be sufficient capacity during peak travel times to support people's needs, and public transport will not take people to all the workplaces they wish to travel to. If each home results in one worker in the new town, 8,000 people will be mobile during each work day. Double deck buses have a capacity of

about 100 passengers. 80 buses over say 2 hours would be needed to move 8000 people. But, 3-4 buses an hour is the most likely frequency, moving just 800. This will result in over 7,000 people commuting other than by public transport, the majority in single occupancy cars. This will clearly add to carbon emissions in the area. This sort of calculation is likely to be reflected in other development areas.

- Concentrating employment land on the western edge will further strengthen the need to commute from for example Honiton and Ottery St. Mary as well as from developments in Woodbury, Broadclyst and along the Exe estuary.
- And, as a consequence of all this, congestion in Exeter will become worse.

**If tackling climate change and net zero carbon emissions were genuinely to be a top priority which shaped planning, an alternative strategy would need to be developed. This would concentrate development and jobs at existing market towns, with developments designed to be low car use, and genuine access to 20 minute neighbourhoods from the start.**

In addition, a **network of dedicated cycle and walking routes should be developed between all main developments and employment areas (Greendale, Hill Barton, Clyst St Mary, Science Park, etc).**

Separately we note that Strategic Policy 66 does not include the cycleway from Cranbrook and Treasbeare to Exeter as one to be protected. Is this because it is already covered by the other designated routes or for some other reason?

**The Infrastructure Development Plan should include all the suggested transport improvements and the facilities to make the new town and other developments genuinely '20 minute neighbourhoods' as identified above so that future Community Infrastructure Levy is used to address the lack of infrastructure, particularly at the western end of East Devon.**

Finally, earlier consultations referred to a development company to control development. The draft plan does not seem to refer to one – perhaps it is unnecessary to include it in this consultation. We would support such a company being able to buy land in new communities to ensure critical infrastructure can be provided. Is it still intended that there should be such a company?