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From: Margaret Leppard [REDACTED]

To: Strategic Planning Committee, EDDC and XX Planning Officer

Date 30<sup>th</sup> March 2025

**Re: EDDC Strategic Plan Regulation 19 Consultation – Objection to SEAT\_02, 03, 05 and \_13a**

## **Introduction**

I have previously found the use of Commonplace clunky. Furthermore Commonplace tightly frames the consultation in terms of the council and central government asking the ‘first questions’. The programme also limits narrative of the lived experience of current residents. Place making procedures value these narratives. My comments in this document refer primarily to Seaton (level 2 settlement) and to planned housing sites, the local environment and economic development. I object to the inclusion of SEAT\_02, 03, 05 and \_13a in the EDDC Strategic Plan for the following reasons.

### ***National and local government’s approach to housing***

The national focus, particularly in recent months has been on *numbers* of houses to be built. This approach fails to ensure that the right types of houses are built in the right place. Government depends on commercial house builders who in turn, depend on building estates of similar properties on sites that yield economies of scale. Similar calculations limit the number of social housing units that are included in developments. Should economic conditions and supply lines change during the course of development work, social/affordable housing units are first to be reduced or abandoned.

Throughout the country, there is housing stock that is abandoned and deteriorating; properties purchased and kept empty until ‘market conditions are more favourable’; second homes some of which are constantly in use by ‘together-apart’ families; second homes used as family holiday homes/ holiday lets and increasing numbers of properties used for short term lets and Air B&B. Current legislation and tax regimens lack power to mobilise these properties for those in genuine need of housing. Central government and councils, including EDDC, need to achieve a more equitable balance between local housing needs and the tourist market. Furthermore, the high proportion of holiday lets in an area with a constant throughput of visitors threatens the development of social capital and health among permanent residents.

The numbers of similar 3-4 bedroom properties that developers create also fail to meet the needs of residents. For example, in Seaton there is significant need for social housing. Local working age residents are primarily involved in hospitality, retail and some are carers. These are not high paying forms of employment. 3-4 bedroom new build houses are unlikely to be affordable for this demographic. Also in Seaton (and nationally) there is a need for different types of housing that meets the needs for multigenerational living; for disabled residents requiring easy access and internal adaptations; for small units for single occupancy. Simply building more numbers on ‘same old, same old’ estates will not work for community members!

Innovative use of existing housing stock requires council officers and legal teams. Importantly it is only now that the national government acknowledges the lack of builders for new builds, repair and renovation. Not all councils have inspectors and officers to monitor and follow up, access, repair and

renovate existing housing stock. There is a need for government and councils to both think and act in radically different ways about equitable housing.

### ***Infrastructure first***

Continuing to place the development cart before the infrastructure horse at every level only leads to a downward spiral in overall human and environmental wellbeing. I join with other contributors to this consultation to highlight the paucity of health services; primary and secondary education; transport and highways; surface water and sewage systems to support new development.

With experience of internal residential flooding I highlight that tertiary technical education for essential building trades and technicians to ensure resilient housing design; ongoing monitoring and maintenance of common areas and sustainable urban drainage systems (SUDS) has received little attention. Therefore development of SEAT\_02, 03, 05 and \_13a threatens existing adjacent properties and environment.

Legislative infrastructure also needs change. In the context of climate crisis; nature based solutions to address flooding; and top down imposition of housing targets, national legislation needs updating in relationship to land registry, riparian rights and responsibilities and use of water courses.

### ***Policy dissonance - where do priorities lie? Nature based tourism?***

Seaton along with other areas in East Devon promotes itself as a destination for nature based tourism. However, the draft Strategic Plan still proposes SEAT\_02, 03, 05 and \_13a for development. Other contributors to the consultations have commented on the impact of these sites on the local environment and ecology.

The Seaton Tramway has recently invested in an additional stop for tourists to access the wetlands. However recent planning applications have not included any visualisation data from the top of the tram or from the new stop. How can we genuinely promote nature based tourism when the view to the west is of housing estates? Also visible from the B3172 and Harepath Road!

### ***Finally, flood risk***

In the same way that we lack technicians and legal instruments to deal with adolescent drainage technologies, I argue that recently published research (see below) demonstrates that planning guidance as it relates to SEAT\_02, 03, 05 and \_13a is behind the curve in relation to climate change and flood risk.

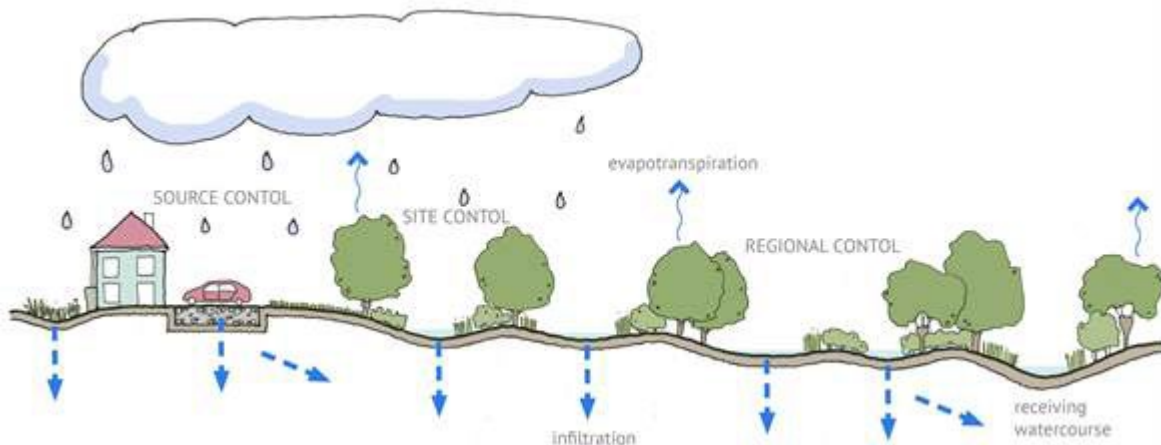
In the course of my experience with field based SWW and DCC Flood and coastal risk and highways staff they do their best in a resource and planning guidance constrained workplace. This carries its own personal stress toll. However, development before infrastructure in economic terms simply externalises costs onto the 'little people' be they flood victims or junior staff.

### ***Beware of blindfolded decision making about strategic planning for SEAT\_02, 03, 05 and \_13a when***

You do not have access to key upcoming reports 'Water cycle report' (EDDC) and 'Assessment of flood risk from surface water and ordinary watercourses in Seaton' (DCC)

A recent Planning committee based decisions on Google Maps Street View that excluded visualisation of critical SUDS receiving watercourses in space.

Water attenuation across the sites is likely to be critically dependent on poorly maintained attenuation basins and permeable paving (and water butts?)



Source: <https://www.susdrain.org/delivering-suds/using-suds/suds-principles/management-train.html>

despite the challenging context of

- increasing short duration high intensity rainfall;
- infiltration being excluded from the SUDS train because of the underlying local geology

and finally,

- limited effective legal instruments and qualified technicians exist to ensure effective ongoing maintenance of common areas and SUDS.

May you be wise in your decision making!

References:

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Renshaw, L., Archer-Lock, L., Skinner, E., Wilson, J JBA Consulting (2024) *Level 1 Strategic Flood Risk Assessment Final Report* [https://eastdevon.gov.uk/media/skxhxxqj/iez-jbau-xx-xx-rp-hm-0001-a1-c01-level\\_1\\_sfra.pdf](https://eastdevon.gov.uk/media/skxhxxqj/iez-jbau-xx-xx-rp-hm-0001-a1-c01-level_1_sfra.pdf) NOTE : Seaton surface water flooding appears under-represented in this report possibly because residents do not report to all agencies or choose not to do so because for example, of fear of insurance costs escalating

Susdrain CIRIA *SUDS Management Train* <https://www.susdrain.org/delivering-suds/using-suds/suds-principles/management-train.html>