

# Feedback report on consultation on the draft East Devon Local Plan (Regulation 18) that was consulted on from 7 November 2022 to 15 January 2023



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Chapter 6 (Part A) – Strategy for development at Principal Centres & Main Centres

**Pages 119-212**

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## Chapter 6 - Strategy for development at Principal Centres, Main Centres, Local Centres and Service Villages

As well as providing a summary of consultation issues relating to Principal Centres, Main Centres, Local Centres and Service Villages, this section also highlights feedback on settlements not included in these policies.

**The summary of issues for each settlement are presented in the following structure:**

- General issues
- Site specific issues (including variations to site boundaries and additional information)
- “Omission” sites - these are sites that were not included in consultation on the Draft Local Plan but were submitted as consultation responses.

### General comments on Chapter 6

- The East Devon AONB team raises concerns that the site assessments are made in principle only with no specific details provided. There is no context to Chapter 6 regarding identifying allocation sites for possible development and how these may be within or in the setting of AONBs. The number, type, layout and appearance of development will significantly affect the landscape impact and allocation alone does not address this. Reference to this should either be made in the context or within each Policy relevant to AONBs.
- Any of the Policy proposals that indicate additional development in settlements within or adjacent AONBs should require the provision of an appropriate LVIA or landscape assessment to accompany any development proposal in line with the AONB policy.
- Policy maps- Maps should show existing and proposed settlement boundaries as well as AONB boundaries to allow for ease of comparison
- The East Devon AONB team state that in towns outside/abutting the AONB, 'preferred' allocations (green sites) outside the AONB should be prioritised and settlement boundaries adjusted to take account of such allocations should not include any new land within the AONB. ;In principle, they do not support the redrawing of town settlement boundaries to include AONB allocations but, if these sites are proposed under the regulation 19 publication of the draft plan, such sites should be only considered if they satisfy NPPF 177 and S85 of the CROW Act 2000 before the plan is made.
- With respect to Budleigh Salterton and villages within the AONB, the ED AONB team support prioritising 'preferred' allocations (green sites) that fall within existing settlement boundaries and any settlement boundaries adjusted to take account of such allocations

should be only considered if they satisfy NPPF 177 and S85 of the CROW Act 2000 before the plan is made.

- Historic England note that the impact on heritage assets and their setting has been considered through a separate Historic Environment Site Assessment (HESA), which reflects Historic England guidance for selecting sites, based around a five-step process of assessment. This evidence was not available to consider, although a synopsis of the heritage assessments in the Site Selection Reports for Tier 1- 4 Settlements was given. These summaries are helpful, and in most respects this is a reasonable and proportionate level of evidence sharing, but for some sites there will clearly be an impact on the significance of designated heritage assets, and their setting, and HE need to see the HESA and its 5 step heritage assessment in full. These requirements are set out for the relevant sites below.
- Housing Association planning consortium emphasises key messages from various Neighbourhood Plan consultations offering support from respondents for the delivery of more affordable housing. The frequency of the affordable housing issue being raised by residents is clear evidence that affordable housing delivery should be a high priority in the new Local Plan
- Otter Valley Association support the hierarchy of settlements. They are concerned that many of the tier 3 and 4 settlements are historic villages and additional development may harm their rural character. A % increase would be more equitable as distribution is unequal.

## Policy 19 - Axminster and its future development - General issues at Axminster

- Axminster Town Council understand and accept the need for the building of housing and employment facilities in order to support the future growth of Axminster but do not consider that the plan contains a strategic approach. They are critical of the site assessment process, which they consider fails to take account of spare capacity and scope and funding for expansion. The Town Council consider that a disproportionately high proportion of housing is being allocated to Axminster without any new supporting infrastructure.
- Lyme Regis Town Council supports the Axminster designations and note the vital role that the town can play in meeting the housing needs of people working in west Dorset. The Town Council also references the number of visitor trips to Lyme Regis by private car and would like to discuss the potential for Axminster station and wider public transport to mitigate the impacts of this.
- The Environment Agency advise that the policy should include specific reference to the need for nutrient neutrality.
- Devon County Council (DCC) state that contributions towards education will be required – the lack of CIL funding from the previous plan for a new primary school at the strategic to the east is not currently deliverable, so proposals have been developed to expand existing schools.
- DCC support development in Axminster given its high level of internalisation so supports reducing the need to travel large distances to access facilities – therefore suggest additional development at the town.
- DCC support the removal of development around the northern end of the proposed Relief Road given issues with delivering the infrastructure.
- DCC state congestion around the George Hotel will need to be addressed but public transport will be improved with the proposed half hourly rail service to Exeter.
- DCC state the SUDS hierarchy should be applied, all off-site surface water discharges from development should mimic “greenfield” performance – see CIRIA SUDS manual and LLFA guidance.
- South Somerset District Council consider housing levels to be disproportionate to the scale of Axminster and suggest this could result in additional traffic in the west of South Somerset.
- Employment development welcomed.
- As a large town it should have more houses, jobs and services
- First and second choice sites seem well thought out but would need improvements to services and transport.

- Several respondents felt that the level of housing growth proposed is disproportionate to size of town.
- There has been sufficient construction in Axminster over the past 10 years. We do not need more housing.
- Proposed development sites would detract from appearance of town and surrounding countryside.
- Relief road needed and housing should be built to the east to facilitate it.
- Axminster would benefit from more social housing and affordable accommodation close to services, public transport and schools.
- Infrastructure, services and employment should be in proportion to housing development.
- Several respondents thought that traffic levels in town centre and other infrastructure must be addressed.
- Axminster lacks infrastructure, road network health facilities, parking etc. to cope.
- Several respondents favoured brownfield development before greenfield.
- Spoiling beautiful places and won't be enough people from Axminster for 1000 homes.
- More housing should be built here rather than in a new town.
- Piecemeal development – new road should be considered separately from housing to fund it.
- Level of development would exacerbate environmental problems including roads and river pollution.
- Need to protect farmland so Axminster residents have access to locally produced food.
- Too much building in Axminster already.
- Axminster already overcrowded and needs no more homes.
- East Devon AONB team request that Strategic Policy 19 be altered to include reference to the need for LVIA or landscape assessment to be provided for each site to assess the effect the proposals would have on the AONB.
- Axminster is positioned between two AONB's and account needs to be taken of the effect on both any development proposed on the edges of Axminster will have.
- National Highways anticipate that the A35 would be likely to be able to accommodate the level of growth proposed at Axminster, but expect a high-level transport assessment for the entire Local Plan.
- If more homes are built more services and facilities will be attracted.
- More homes needed to help Axminster thrive.
- Criticism on behalf of one of the landowners for requirement for 1ha of employment land on sites GH/ED/79 and 80a because of character of surrounding area, landform, access issues, lack of public transport on Lyme Road and viability issues. Also not needed as employment only allocations being proposed in Axminster. However, there is support from the same landowner for a requirement for provision of a community hub building

that can be used for a variety of uses including workspace, café, meeting rooms, etc, all falling within the wider E use class.

- Number of dwellings on sites GH/ED/79 and 80a should be increased from 293 to 310 to reflect detailed assessment work shown in representations.
- House builder commented that:
  - Axminster is a highly sustainable settlement with very good transport connections and a strong range of shops, services and facilities.
  - Failure to deliver strategic site in adopted local plan means there is a current deficit in land supply and a need to allocated more to address future need.
  - Opportunity to balance out distribution strategy focussed on western side of East Devon.
  - Potential to meet housing needs of Lyme Regis.
  - At least 1000 homes should be allocated.
  - Town centre suffers from a loss of critical mass and needs additional population.

### **Axminster Neighbourhood Plan Survey**

The Axminster Neighbourhood Plan Steering Group circulated to residents relevant extracts from the draft plan and summarised the Steering Group response on a small number of issues and proposed allocations. Residents were invited to indicate whether they agreed with the response or not and were invited to raise any other comments. Around 40 completed surveys were submitted during the local plan consultation. The Steering Group comments and responses received in the survey are briefly summarised below.

- Infrastructure – There is a critical need for infrastructure before building new homes, but the proposed relief road has not been delivered and hundreds of new homes have been built without infrastructure. Local roads are overloaded, and health and education facilities are struggling to cope with the current population, let alone a major expansion. All the survey responses where a preference was expressed supported this analysis.
- Accessibility – A sites accessibility should not be assessed just by measuring 1,600 in a straight line but should include the actual walking distance plus consideration of slopes and pavement quality. All the survey responses where a preference was expressed supported this analysis.
- Density – The Steering Group believe that housing densities should be delivered in line with the National Model Design Code and that any proposals for less than 30 dwellings per hectare (dph) should not be considered. The default target for Axminster should be 40 dph. The majority of respondents supported this approach some would prefer lower densities, particularly outside of the town centre.

- Housing Allocations – The Steering Group believe allocating a further 1,050 dwellings is disproportionate to the town's ability to absorb new residents and is out of proportion to what is planned for other East Devon towns. The vast majority of respondents agree with the Steering Group, although one person commented that a Tier 2 settlement should be prepared for growth if supported by infrastructure, services and facilities.
- GH/ED/79 - principle of development accessed from Lyme Road without relief road is acceptable. A majority of respondents supported this view, but some did not, citing the lack of a relief road, flooding and highway safety as concerns.
- GH/ED/80a - The Steering Group commented that providing effective flood mitigation will be difficult and access from Sector Lane would be unacceptable. It felt that the closure of Sector Lane proposed through the relief road would be impractical and the steep slope would make pedestrian and cycle access difficult. All but one respondent agreed with several expressing concerns about flooding and highway access.
- GH/ED/82 - concerns were raised about the additional HGV traffic on Weycroft Bridge and impacts on the adjacent stream together with the need to manage the relationship with the important group of listed buildings to the north. The vast majority of respondents agreed with the comments and even those who said they did not commented on additional traffic congestion, pollution, flooding, archaeological impact and potential impacts on listed buildings.
- GH/ED/83 - land south of Tiger Way should not be allocated for housing but may be suitable for food retail to ease town centre congestion and serve local residents better. Land north of Tiger Way is less suitable for development because of its distance from the town centre. Respondents generally supported these comments, but some did not support any kind of development.
- Axmi\_01a – was considered to be suitable for employment. This was largely supported, although a respondent queried what sort of employment would be provided.
- Axmi\_02&08 – Sites are considered to lie beyond a clear natural boundary and could lead to more housing beyond if developed. Safe pedestrian access to Musbury Road cannot be provided and accessing the town via Wyke Lane involves steep slopes and a long walk so future residents would be car reliant. The sites form attractive countryside visible from the AONB, good agricultural land and well used for recreation. Most respondents agreed.
- Axmi\_07 – allocation of site welcomed are would be preferred for higher density housing rather than employment. Consideration should be given to improved pedestrian/cycle links across the site and a road connection from the by-pass slip road to the train station. Only one respondent expressed a contrary view.
- Axmi\_09 – site is indistinguishable from the AONB landscape and would be a car based satellite suburb. Considered to be the least defensible site for development. No respondents supported development of the site.

- Axmi\_10 – site is being marketed for housing and may be suitable for 3 – 4 storey buildings. Some respondents supported housing development, but a significant minority wanted it kept for community use.
- Axmi\_11a – Large site with best access to the town and opportunities to provide flood mitigation to ease pressure on the Purzebrook. Support for high density affordable housing. A significant number of respondents were opposed to development for reasons including impact on setting of school, increased traffic and flooding. There was also support for development, with a majority supporting the steering group comments.
- Websters Garage – The Steering Group thought that this site should be allocated for development to encourage its use. Most respondents agreed and were keen to see something happen soon, although several expressed concerns about lack of car parking.
- Millway Rise Football Field – Site is not allocated in the plan, but a separate EDDC document proposed a modest number of affordable homes at low density. The Steering Group feels that if affordable housing is to be built it should be at least 50 homes, but a new food store is preferred, possibly with affordable housing as well. The majority of respondents agreed, but some were concerned about loss of green space.

Nb. Devon County Council's consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.

### **LP\_Axmi\_01a – Land off Musbury Road, Axminster (southern area) - Proposed Employment Allocation**

- Representation on behalf of land owner includes a concept plan showing around 6,000 square metres of employment floorspace with more achievable if two or more stories allowed. Benefits of the scheme are listed as flood storage in the central part of the site with public access, biodiversity net gain and retention of heritage assets.
- The Environment Agency state that area at risk of flooding to the northern boundary should be set aside for green infrastructure with at least an 8-metre buffer from the watercourse free from development.
- Land of Musbury Road (site Axmi\_01) has been split into a southern area (a) and a northern area (b).
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with



national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.

- National Highways expect further discussion on this site as it is adjacent to the A35 or could affect the A35 through access arrangements.
- Devon County Council suggest this site should be allocated given the relatively short distances to a range of facilities.

### **LP\_Axmi\_01b - Land off Musbury Road, Axminster (northern area) - Rejected Site**

- Axminster Town Council supports the employment allocation.
- Representation on behalf of land owner includes a concept plan showing around 12 homes accessed from Abbey Close. Benefits of the scheme are listed as flood storage in the central part of the site with public access, biodiversity net gain and retention of heritage assets.
- North-western boundary of site supports a large colony of Common Lizards (*Zootoca vivipara*). This species is protected under the Wildlife and Countryside Act and it is also a “Priority Species” under the UK post-2010 Biodiversity Framework. Any development on the south-western boundary would need to consider their possible presence. Specialist wildlife advice is needed.
- Site could potential be better used as an industrial space with access to A35 ... reducing the flood plain capacity and usage.
- With the flooding potential and the architecture, I feel this is not a suitable site to develop. However, if it is only used for employment purposes and current improvement to infrastructure is considered to ensure large vehicles/too many vehicles are not needing to disrupt the people living there then it could be OK.
- Any development of this site would have adverse impact on AONB due to proximity.
- Don't need any more housing.
- Would be better as industry.
- Not suitable for development due to flooding and architecture.
- May be alright for employment if not too many or too large vehicles.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- National Highways expect further discussion on this site as it is adjacent to the A35 or could affect the A35 through access arrangements.

- Devon County Council suggest this site should be allocated given the relatively short distances to a range of facilities.

### **LP\_Axmi\_02 - Land North of Shoals, Musbury Road, Axminster - Preferred Allocation**

- Axminster Town Council is concerned that the site lies beyond a long-established and clear natural boundary and development would act as a bridgehead for further housing. They are concerned that there is no safe access to the town along Musbury Road and access via Wyke Lane involves steep slopes and a long distance so that future residents are likely to walk. The site is attractive countryside, visible from the AONB, is good agricultural land and used for recreational walking. Environmental mitigation would reduce the number of homes that could be delivered.
- The Environment Agency state that areas at risk of flooding to the southern boundary should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- Representations on behalf of prospective house builder state that this site should be considered as one with Axmi\_08 and Axmi\_09. Technical reports on geotechnical, contamination, infrastructure, landscape, ecology and historic environment show sites are deliverable.
- Good job opportunities for locals.
- Probably the best site for homes in the area.
- Priority should be given to brownfield sites.
- Overdevelopment
- A number of respondents raised concern about the archaeological importance of the site including its close proximity to a Romano British village, Fosse Way and Saxon and Roman finds.
- A number of respondents lamented the loss of green space used for recreation and important for mental health.
- Some respondents were concerned about the loss of agricultural land.
- Lack of infrastructure and services.
- Additional traffic will cause pollution and congestion.
- Would cause traffic problems because Woodbury Lane is not wide enough for two-way traffic.
- Pedestrian access to the town is limited.
- Flooding from tributary to River Axe.
- Should develop sites closer to town centre.

- Site lies beyond clear natural boundary.
- Loss of attractive countryside visible from AONB.
- Given gradients and distance from town centre most trips are likely to be by car.
- A number of respondents raised concerns about access to Musbury Road.
- Loss of nature interest.
- Impact on bats.
- Loss of hedges.
- Loss of amenity for neighbouring housing.
- Water table of River Axe has already been damaged by too much house building.
- Houses will be affected by noise from A.35.
- Mains service could be affected by digging.
- More houses not needed in Axminster.
- National Highways expect further discussion on this site as it is adjacent to the A35 or could affect the A35 through access arrangements.

### **LP\_Axmi\_07 - Axminster Carpets Factory Site, Woodmead Road, Axminster - Preferred Allocation**

- Axminster Town Council welcome inclusion of the site as it is well connected to the town and could improve access from Gamberlake Cross. The Town council would like to see much of the site redeveloped for higher density housing rather than employment.
- The Environment Agency state that a Strategic Flood Risk Assessment Level 2 will be needed for this allocation including sequential and exceptions tests. If it passes, a masterplan will be needed to secure environmental and other enhancements, including opening the culverted watercourse to create a natural blue green nature corridor. The SFRA2 could identify opportunities to reconfigure the current area at risk of flooding, ideally to achieve an overall improvement. Would also need to remediate contaminated land.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- There was support for this site allocation with comments including:
  - Several respondents felt that it would be a good use of brownfield site.
  - A couple of respondents noted that the site is close to public transport.
  - Close to town.
  - Good place for affordable housing.
- Junction of Woodmead Road is unsuitable for additional traffic.

- Town centre already difficult to drive through.
- No proper access road to site and heavily congested by existing businesses.

### **LP\_Axmi\_08 - Land off Wyke Lane, Axminster - Preferred Allocation**

- Axminster Town Council is concerned that the site lies beyond a long-established and clear natural boundary and development would act as a bridgehead for further housing. They are concerned that there is no safe access to the town along Musbury Road and access via Wyke Lane involves steep slopes and a long distance so that future residents are likely to walk. The site is attractive countryside, visible from the AONB, is good agricultural land and used for recreational walking. Environmental mitigation would reduce the number of homes that could be delivered.
- The Environment Agency state that areas at risk of flooding to the southern boundary should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Representations on behalf of prospective house builder state that this site should be considered as one with Axmi\_02 and Axmi\_09. Technical reports on geotechnical, contamination, infrastructure, landscape, ecology and historic environment show sites are deliverable.
- Not close to transport link and would cause greater pollution, climate change and road congestion.
- Site remote and would need car to access essential services.
- Open countryside beyond long established and natural boundary.
- Visible from AONB.
- Loss of recreational walking area important for mental health.
- Huge impact on local amenities.
- Additional traffic on Woodbury Lane, which has dangerous access to Lyme Road.
- Greenfield site would harm wildlife and increase runoff to other land including A35 junction.
- Woodbury Lane and Wyke Road are narrow and constrained by parked cars.
- Greenfield site should be used for food production.
- Flood risk to properties on lower land.
- Lack of infrastructure.

- National Highways expect further discussion on this site as it is adjacent to the A35 or could affect the A35 through access arrangements.

### **LP\_Axmi\_09 - Great Jackleigh Farm, Axminster - Potential 'Second Best' Allocation**

- Axminster Town Council feel that the considerations that apply to Axmi\_02 and Axmi\_08 apply to this site. In addition, the distance from the town would result in a car dependent satellite suburb where residents would shop in Seaton so that countryside would be traded for housing that could go elsewhere. The situation could be improved if these three sites had their own facilities such as school, shop and GP surgery.
- The Environment Agency state that areas at risk of flooding associated with the watercourse that bisects the site should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- Representations on behalf of prospective house builder state that this site should be considered as one with Axmi\_02 and Axmi\_08. Technical reports on geotechnical, contamination, infrastructure, landscape, ecology and historic environment show sites are deliverable. Site should be included as a preferred allocation,
- Would destroy rural charm of Devon lanes and ditches.
- Increase in traffic.
- Loss of walking areas.
- Open countryside beyond long established and natural boundary.
- Visible from AONB.
- A few respondents felt it would lead to the loss of recreational walking area important for mental health.
- Lack of services and facilities.
- Loss of greenery and wildlife.
- Infrastructure cannot cope.
- Loss of greenfield site.
- Loss of trees and hedgerows.
- A few respondents mentioned increased flooding.
- Landscape same quality as AONB.

- Likely to shop in Seaton.
- Too far out of town.
- Prime agricultural land should be kept for food production.
- Would need car to access town centre.
- National Highways expect further discussion on this site as it is adjacent to the A35 or could affect the A35 through access arrangements.

### **LP\_Axmi\_10 - Scott Rowe Building, Axminster Hospital, Chard Street, Axminster - Preferred Allocation**

- Axminster Town Council regret the loss of any facilities on the hospital site, but acknowledge that it is being marketed for residential use. It supports higher density housing, possibly 3-4 storeys high.
- Need to keep hospital to be reopened.
- A few people thought it should be kept for health or social care – even more important with town expansion.
- Land was given to the town for health purposes and should not be used for financial gain of developers.
- Bungalows better than flats but should be kept for health or social care.

### **LP\_Axmi\_11 – Whole site – All comments from site promotor**

- Whole site should be identified as a 'first choice' for allocation (the draft plan proposes 11a as a second choice and rejects 11b).
- Inconsistencies in evidence base (including the draft Strategic Environmental Assessment) and consider that an objective analysis and comparison of site options has been undertaken.
- Landscape sensitivities and proximity to Scheduled Ancient Monument have more of an impact on other sites that are preferred choices.
- Site could provide at least 250 homes with open space and deliver appropriate mitigation.
- Highway access can be provided from Lyme Road with a secondary access achievable from Lyme Close if necessary.
- Site is not suitable for employment or older persons housing and not expected that there would be a demand for either.

### **LP\_Axmi\_11a - Land on the south-east side of Axminster - *Potential 'Second Best' Allocation***

- Devon County Council, as landowner, supports allocation as site is close to town centre, has good access to local facilities and transport options.
- Axminster Town Council consider this to be the best large site for access to the town centre. It would offer opportunities to build in flood mitigation measures to relieve flooding on the Purzebrook and the Town Council support high density affordable housing on the site.
- The Environment Agency state that areas at risk of flooding associated with the watercourse on site should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development. Given the history of flooding to property downstream, development should seek to provide a reduction in risk.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- Site promoters state that site is suitable and deliverable for at least 250 homes with sizeable open space.
- Site has potential and is close to amenities of town, although wet at the lower edge.
- Flooding of Phillips Court, Lea Combe and Purzebrook.
- Several respondents mentioned that the fields are used by dog walkers.
- Air noise and light pollution. Increased traffic congestion.
- Give priority to wildlife.
- A couple of respondents mentioned inadequate access.
- A couple of respondents were concerned about the loss of natural context for school.
- Oak tree must be preserved.
- Preserve all boundary trees.
- Increased runoff.
- Should combine with Axmi\_12 but go no further south than fire station.
- Partly on flood plain.
- Beautiful area.
- Will cause disturbance to the school.
- Steep gradient.
- Will add to river pollution.
- Road congestion and poor access.

### **LP\_Axmi\_11b - Land on the south-east side of Axminster - *Rejected Site***

- Site promoters state that site is suitable and deliverable for at least 250 homes with sizeable open space.
- Will push traffic onto Woodbury Lane.
- Unsuitable for development due to access and flooding risk.
- Brownfield sites should be developed before greenfield.
- Loss of trees.
- Should be school and community garden.

### **LP\_Axmi\_12 - Land at Lea Combe, Field End, Axminster - *Preferred Allocation***

- Devon County Council, as landowner, supports allocation as site is close to town centre, has good access to local facilities and transport options.
- Loss of natural habitat.
- Close to congested junction.
- Additional pollution and town centre already saturated.
- Tree Preservation Order would need to be maintained.
- Combine with 11a to link to rear of fire station but all trees should be preserved.
- Linked with 11a would make use of a field that has done nothing for years.
- Could be part of internal bypass, which would be a good idea.

### **LP\_GH/ED/79 - Land east of Axminster - *Preferred Allocation***

- Axminster Town Council accept the principle of development on the site.
- Representation on behalf of the land owner state that:
  - A planning application is beign progressed and the site is deliverable;
  - The wording of draft policies present a potential burden to development and should be reconsidered to improve flexibility and deliverability of development;
  - Recommend that the sentence ‘The endorsed Axminster Masterplan provides guidance for how this site should come forward’ be removed as the masterplan is obsolete.
- Lack of infrastructure.
- Town centre congestions.



- Several respondents were concerned about flooding.
- River pollution.
- Need a relief road so no housing should block line of proposed road.
- Natural beauty
- A couple of respondents lamented the loss of wildlife including foxes, deer and birds of prey.
- Several respondents commented that Lyme Road is unsuitable for additional traffic due to congestion.
- Taking account of gradient this is the best option for Axminster growth, but only suitable for access from Lyme Road.
- Access to Lyme Road would be dangerous.
- Would only be accessible by private car.
- Better kept for agriculture if no relief road.
- Good to have access from Lyme Road.
- Loss of greenspace and lack of infrastructure.
- Other sites have safer access and are closer to the town centre for families to walk.

### **LP\_GH/ED/80a - Prestaller Farm, Beavor Lane, Axminster - Preferred Allocation**

- Axminster Town Council note that much of the site is very steep and providing effective flood mitigation will be challenging. The Town Council consider that access from Sector Lane is unacceptable and access via site GH/ED/79 would be in practical.
- The Environment Agency state that areas at risk of flooding to the northern and eastern boundaries should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Devon County Council (DCC) state this site has been impacted by surface water/ordinary watercourse flooding.
- DCC note this site is located within Axminster Critical Drainage Area.
- Representations on behalf of landowner proposed deletion of the 1ha of employment allocation and assert that the site is capable of being brought forward and delivered within the Plan without the need for the relief road as originally envisaged.
- The Crown Estate own some 31 hectares of land of which only around 12ha is a proposed allocation for mixed use. While not proposing any additional land for development, a vision has been put forward for the whole land ownership to include (on GH/ED/80a) around 225 new homes; a community hub providing workspace, café, meeting space; 1.66ha open space, green infrastructure; new pedestrian /cycle links; and vehicular access to the south off Lyme Road through GH/ED79. Outside of the

proposed allocation 19.82ha is proposed for BNG, tree planting, phosphate nutrient mitigation, community orchards and publicly accessible open space.

- Town congested with no relief road.
- Will exacerbate flooding.
- Will exacerbate river pollution.
- Would sterilise bypass.
- Sloping ground better for wildlife and unsuitable for housing.
- There are better areas for housing so no need to cram around Axminster.
- Loss of land for walkers.
- Loss of wildlife.
- Increased runoff where hedgerows and trees are removed.

### **LP\_GH/ED/80b - Prestaller Farm, Beavor Lane, Axminster - Rejected Site**

- Land south of Beavor Lane inappropriate but land to north could be suitable for a mix of residential and employment.
- DCC note this site is located within Axminster Critical Drainage Area.

### **LP\_GH/ED/81 - Land east of Axminster - Rejected Site**

- Why has the relief road been considered unviable? It is vitally needed infrastructure because heavy traffic is killing the town – vibrations from heavy vehicles shake buildings in the town centre.

### **LP\_GH/ED/82 - Land at Weycroft Manor Farm - Proposed Employment Allocation**

- Axminster Town Council are concerned about additional HGV movements on Weycroft Bridge and in the town centre. It is also concerned about the impact of development on the adjacent stream and consider that any narrowing of the gap between Axminster and the Grade I listed Weycroft Hall needs to be very carefully managed.
- The Environment Agency state that areas at risk of flooding to the northern part of the site should be set aside for green infrastructure with at least an 8-metre buffer from the watercourse free from development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with

national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. 82, and 83 appear particularly challenging mindful that you, and the SA, consider development would cause considerable harm to the significance of the Weycroft heritage assets; which questions their suitability in principle.

- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.

### **LP\_GH/ED/83 - Land at Chard Road, Axminster - Preferred Allocation**

- Axminster Town Council understand the logic of allocating land south of Tiger Way but believe that no more housing should be allocated to the north of Axminster without better food retail provision to relieve town centre traffic congestion and better serve existing residents. The Town Council regard land north of Tiger Way to be less suitable for development, partly due to the distance from the town centre.
- The Environment Agency state that flood risk should be included in the policy wording, a buffer included to avoid supporting habitat to the River Axe SAC and provide biodiversity net gain.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. 82, and 83 appear particularly challenging mindful that you, and the SA, consider development would cause considerable harm to the significance of the Weycroft heritage assets; which questions their suitability in principle
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- DCC query whether this site needs to drain into the existing Vistry/Linden Homes site and, if so, has this been accounted for.
- Site promoter has developed a masterplan to show 0.8 ha of employment land for Class E to ensure compatibility with housing, and 120 homes at 35 dph. It is suggested that, unless a higher density is considered appropriate, the policy wording should be amended to reflect this.
- Logical place to extend and recent development has a bus link.
- Ridiculous sprawl resulting in loss of open area and footpaths.
- Several respondents expressed concern about an increase in river pollution.
- Several respondents were concerned about loss of space for walking.
- Some respondents were concerned that development would increase flooding.
- Loss of wildlife when trees and hedges are removed.
- Loss of barrier to Weycroft that has a notable local character.

- Site is next to a single track historic river bridge that is impossible to widen or extend or bypass.
- No shops nearby.
- Land south of Tigers Way suitable for development but nor to the north as too close to historic buildings and Weycroft Bridge.
- Too far to walk into town.
- More traffic on busy road.
- Town centre already congested.
- Land not suitable for building as too close to river.
- Impact on wildlife in river.
- Any new build housing is unaffordable for local people.
- Loss of archaeological interest.

### Omission sites at Axminster

- Axminster Town Council ask that sites Axmi\_15, Axmi\_16, Axmi\_17, Axmi\_18, Axmi\_19, Axmi\_20, Axmi\_22 are considered together with the Webster's Garage site.
- Land West Of Prestaller Farm Beavor Lane - a planning application for 29 dwellings on this land is currently under consideration 21/3025/MFUL. The agent states that the Highway Authority have no objection to the application and that drainage and landscape improvements are under consideration to improve the scheme. It is asked that the settlement boundary be extended to include this land.

## Policy 20 - Exmouth and its future development - General issues

There were a number of general concerns that were raised in respect of development at Exmouth. There were also concerns raised in individual site comments that could be seen to apply to many sites (to some degree perhaps all sites) that are shown as proposed allocations and the main themes in these and more general comments that were in objection to development (in general or specific sites) are summarised below:

- There were many respondents expressing the view of a concern of overdevelopment in Exmouth
- A lot of respondents suggested that further development should be small scale using brownfield sites;
- A number of respondents were of the view that new development should increase the density of the existing built form and not spread outward into countryside areas;
- Loss of greenfield sites to development was a common theme in site specific objections to the draft local plan;
- The North East Exmouth Residents Group request that plan production be paused until Government clarify the changes to the housing requirements. They consider that the new town should be the main focus for new growth and the amount of housing directed to Exmouth and Lympstone reduced on the basis of insufficient infrastructure capacity, increased flood risk, loss of green space and lack of affordable housing close to the town centre and facilities.
- There was a commonly expressed concern that homes built will not be for or meet the needs of local Exmouth people;
- There were objections raised that houses would not be affordable, and they would be expensive and often large and serve/result in in-migration;
- Objection advised that local first time buyers are being priced out of the housing market due to unaffordable house prices, the increase in 2nd home owners using properties for Air BnB's
- Flooding concerns came up in a number of comments on sites around Exmouth and it was highlighted that houses in comments that Littleham is prone to flooding;
- There was concern and objection raised that extra development in and around the town will lead to greater levels of sewerage discharge;
- It was suggested that South West Water need to address sewerage matters before extra development is allowed or occurs (lack of capacity was cited as a reason for opposing Government housing targets);
- Comments received expressed concern that development at Littleham would erode gap with Budleigh Salterton and enclose the historic village;

- Many comments expressed concern that development to the north of Exmouth would erode the gap between Exmouth and Lympstone (and Woodbury) and impinge on the settlement and character of Lympstone;
- There were many concerns expressed in respect of the highway capacity at and around Exmouth and the ability to cope with additional vehicular traffic;
- The A367 was specifically highlighted, in many representations, as a road that is already congested and that cannot cope with additional pressure from development;
- There were concern that the levels of development around Exmouth will leave to vast amounts of tree felling and loss;
- It was considered that many proposed development allocations sites would be contrary to the Exmouth and also the Lympstone Neighbourhood Plans and too much development, in general, is planned leading to inconsistent with neighbourhood plan/s.
- Views were expressed that completion of Dinan Way should happen before further development occur.
- There were concerns that bus services were inadequate with specific calls for a 15 minute bus service on the number 57 to Exeter, plus reinstatement of the number 58 service to Sowton.
- In some site specific comments there were concerns raise about adequacy of bicycle links and there was a call for cycle facilities on Exeter Road, Dinan Way, Salterton Road, and Rolle Street to enable journeys around the town and to the Exe Estuary Trail;
- Many representations advised of limited employment in Exmouth, as a reasons to oppose residential development, with it being pointed out that most people travel to Exeter to work, new houses were seen as exacerbating this situation.
- Views were expressed, in respect of many sites, that they were on the periphery of the town and some distance from the town centre. For example in representation it was advised that Lymp\_08, 09, 10a, 14 and Exm\_04 are all more than 1.5 miles from the town centre with no public transport.
- There was concern expressed that development will inevitably be poor quality and that it will not support community needs.
- The suitability of Exmouth Community College to expand to accommodate additional pupils is challenged with recent school development proposals seen as being of poor quality.
- Parking, congestion and vehicle fume concerns are sited as problems at and with the school.
- There was a call for better train services and railway upgrades and a new Park and Ride station to the north of Exmouth.
- Many site-specific comments (objections) to development, raised concerns about the ability of the existing social and community infrastructure of Exmouth to meet existing needs. Significant concerns were raised around the ability to accommodate needs

generated by additional housing development. There was a view expressed that new facilities provision should precede new housing development.

- Raw sewage is pumped into the sea during the summer due to lack of capacity, this must be resolved before increasing the problem
- It was highlighted that Exmouth is set out in a limb, constrained by Estuary (noting its wildlife designations) and sea to the south and west, AONB and Pebbled Heath to the east, estuary setting and landscape sensitivity to the north and there are limited main transport links into the town. These factors were highlighted as significant constraints in accommodating development.
- A new village on the fields around the Church of St John's in the Wilderness would impact the important coast, town centre and countryside the least, with good road links along Dinan Way.
- The National Trust highlight importance assets that they own at Exmouth, both countryside and built heritage. They stress the heritage importance of A la Ronde and landscape relevance of Lower Halsdon Farm. The trust identify adverse heritage and landscape impacts arising from development and advise - development at the proposed 'second choice' allocations could be at odds with the contribution that the National Trust land and surrounding area makes to the unspoilt open qualities of the landscape in this location, which should be highly valued. Therefore, for the reasons set out above, the National Trust object to the allocations as 'second choice' sites, and requests that these are omitted from future consultation stages of the emerging East Devon District Council Local Plan.
- Lack of infrastructure capacity in general, in Exmouth, such as GPs, dentists, schools, shops, recreational facilities, roads, storm water management & sewage treatment was commented on in many submissions and concern that new population growth would worsen problems without delivering extra facilities.
- It was contested that the level of house building at Exmouth is too high and is not justified by up to date robust evidence.
- Comment was made that the Plan makes no reference to the Blue Flag status of Exmouth beach despite the fact that this is a major draw for tourists and holidaymakers. Attracting people to Exmouth is supposed to be at the heart of the LP.
- At para 6.16 the Jurassic Coast and the AONB should be referenced (highlighted that text applied to Lympstone and Beer is applicable to Exmouth).
- The Avenues Residents Association advise - The proposed Littleham / Maer Valley Park shows no signs of becoming a reality as the landowner claims that it would take "valuable agricultural land" - the same landowner is, however, willing to sell parcels of the same land for housing developments.
- It was contested that there is not proactive activity being undertaken in attracting employment into Exmouth – and integrated strategy should be produced to evidence how

jobs should be provided alongside any new homes (publication of the plan should be delayed until this happens).

- A response advised - there is a clear need to establish more active travel & sustainable transport options within the town, in particular creation of new sections that will link together existing cycle paths & walkways and a need for better bus services.
- Object to Exmouth sites as they are a long way from the town centre and its facilities, encouraging car dependency.
- Object to Exmouth sites as they will impinge on the green wedge further reducing the gap to Lympstone.

There were, however, some comments that were of a more general nature about development at the town, matters that need further investigation or that favoured development at Exmouth. These comments included:

- National Highways note there is a substantial outflow of commuters from Exmouth to Exeter which impacts upon M5 Junction 30 – Local Plan transport evidence should consider this impact;
- Devon County Council (DCC) state proposed development in the Exmouth area cannot be mitigated by Exmouth Community College, so a review of catchment areas will see the need for a larger school in the proposed new town;
- DCC support development in Exmouth but note the difficulties of development being able to come forward near to the town centre, train station, and facilities located in the south west of the town;
- DCC state development around the north and east fringes must provide good quality bus services to existing facilities, and are better locations than a new community as would be closer to existing facilities – development on some of the second choice and rejected sites could reduce the need for a new community;
- A site promoter supported the designation of Exmouth as a principal centre and considered that it would be possible to make provision for growth of 10% without conflicting with major constraints and government policy.
- Concern was expressed that not enough effort is going into promoting employment in the town and thus negating/reducing the need to commute to jobs in Exeter.
- East Devon AONB team request that Strategic Policy 20 to be altered to include reference to the need for LVIA or landscape assessment to be provided for appropriate sites to assess the effect the proposals would have on the AONB. They support the preferred allocations only;
- A major landowner supports the proposal to locate a substantial amount of housing at Exmouth and the allocation of sites in its ownership (Clinton Devon Estates) as being deliverable, suitable for development and well related to Exmouth's existing building up area;



- There was a view that it is somewhat bizarre that Exmouth, the only Tier 1 town has such a very small allocation and that some small villages with almost no infrastructure and poor road links have more proposals. There was also a suggestion that Exmouth should grow further.
- An Exmouth Member has expressed concern that the boundary changes were not considered by the Strategic Planning Committee and include some controversial sites, potentially this could be unfair/pre-emptive
- Bystock Village should not be included within the settlement boundary. It has not been drawn consistently and conflicts with the methodology, whilst not adding anything to the land 'supply'.

Nb. Devon County Council's consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.

### Proposed allocated land on the north eastern side of Exmouth – Sites

- LP\_Exmo\_04a - Land at Marley Drive - *Potential 'Second Best' Allocation*
- LP\_Lymp\_09 - Land at Hulham Road - *Preferred Allocation*
- LP\_Lymp\_10a - Land off Hulham Road - *Preferred Allocation*
- LP\_Lymp\_14 - Coles Field, Hulham Road - *Preferred Allocation*

These sites are grouped together as they form a proposed combined allocation in the draft local plan. Comments received on the sites have been grouped together to reflect on the proposed collective provision as an allocation. However, specific points that may relate to a specific listed site or for example feature within or on it are highlighted. By way of comment on the site:

- Devon County Council (DCC) state an underground watercourse flows through Lymp\_14 with sections possibly culverted – this should be investigated and opportunities to enhance or daylight any sections should be sought.
- DCC state the drainage at Lymp\_09 and 10a may need to be carefully considered if infiltration is not viable – there do not appear to be any watercourses or sewers in the vicinity.
- Lympstone -  
- Part of this site is in Lympstone Parish and designated 'red' on the maps as rejected for development. However, on the notes part of the site may be considered a second-best choice noting site constraints.

- As this was designated a rejected site it was not included in our Public Consultation but residents present at the Parish Council's presentation of their draft response to the East Devon Local Plan raised a number of concerns.

- A site promoter objected to an approach that seeks to link the delivery of these sites because they are in differing ownerships and some are affected by delivery constraints, whilst others are not. They considered Lymp\_14 to be an unconstrained site that can be released early once services have been provided through the existing Goodmore's Farm development. There is no objection to masterplanning work being undertaken collaboratively, so long as that does not inhibit the opportunity to deliver Lymp\_14 in expedient fashion.

There were a very substantial number of objections to the principle for development of land on the north-eastern side of Exmouth. A summary of key matters raised in objections is set out below:

- Development would lead to adverse impacts on trees with Tree Preservation Orders and ancient woodland – it was advised that there must be a 500 meter buffer between any development and ancient woodland.
- The woodland area included within the LP\_Exmo\_04a proposed allocation is under review and it is expected that it will be designated as ancient woodland later this year. This woodland must be retained as it is incredibly important from an ecological perspective supporting numerous fauna and flora. The woodland must be protected. If Exmo 04a is not withdrawn from the plan it will require a 50-metre buffer/exclusion zone around the woodland to aid its preservation.
- The land in the eastern section of proposed allocation Exmo\_04a is to be proposed as additional county wildlife site as it immediately abuts the existing designated land in this area, which in turn abuts the ancient woodland.
- In the parcel EXM 12 there are TWO county wildlife sites and many extremely old evergreen oaks with TPO's
- Ecological constraints would mean that pedestrian and cycle paths will not be built;
- Horrified and scared at the proposal to build yet more houses in the vicinity of Exe View and Hulham Road.
- Development would result in the loss of wonderful countryside, a respondent advises which I walk and relax in is to be vandalised
- Concern over at least 200 more motor vehicles in Wotton Lane, known locally as the "rat run".
- Lack of infrastructure – especially health service provision;
- Development would lead to overwhelming by the extension of Exmouth;
- Lack of clarity over who the houses are for;
- Absence of businesses (nearby) to supply jobs for residents;

- Development would adversely impact on appeal of the area to tourists.
- Development of the site would not be sustainable;
- There is inadequate school provision;
- Roads are at capacity;
- Highway safety and noise nuisance issues would arise;
- Insufficient infrastructure capacity with expectation from development of particular pressure on the road links to Exeter.
- Brownfield and town centre sites should be redeveloped to accommodate the extra housing;
- Unacceptable impacts on wildlife within and at the site;
- Flooding will be exacerbated by additional tarmac;
- In respect of site Lym\_10a one respondent advises it is - On the wrong side of the road. Floods a lot and blocks the stream down Wotton lane leading to flooding at the Sadllers Arms.
- The sites are three miles from the town centre, which on top of the Goodmores estate will create more traffic on the local roads around that area which are already very busy;
- Site/s are at the outer (or beyond) peripheries of acceptable walking distances;
- Homes built will not be affordable. Highlighted that only 16 out of 317 homes on the Goodmore estate will be affordable.
- Concern that there are not enough services in Exmouth to support another 1,000 local residents
- Concern that Exmouth only has two large supermarkets in the town, the rest are small convenience stores with higher prices.
- The view was expressed that this development, in conjunction with others, will have a huge negative impact on the health and wellbeing of Lypstone Parish residents.
- Concern expressed that bus and rail services at or close to the site are very poor.
- Access to employment opportunities was cited as being poor.
- View is expressed that there are no safe pedestrian and cycle routes so residents will be car dependent;
- The view was expressed that car use will be the norm for persons to travel to work on already overcrowded roads;
- The development will have significant negative effects on the environment.
- Farming land will be lost – one respondent advised it is Grade 1.
- The green wedge between Lypstone and Exmouth will be seriously eroded;
- The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents.
- Valuable wildlife corridors will be lost;
- Important areas of landscape and visual amenity will be lost forever;

- Cherished green spaces and woodlands have been lost which could have created a sustainable barrier at the north of Exmouth to prevent it growing into an urban sprawl;
- Loss of historic open land on Pebblebed Heath which is a valuable local amenity;
- The area around is already over-developed;
- The allocation is too remote from services and facilities in Exmouth;
- Adversely impacting on the existing gateway entrance to Exmouth;
- Part of the site falls in Lympstone Parish and housing need should be considered in the context of Lympstone needs;
- Development had widespread local opposition;
- The development will have a negative impact on the health and wellbeing of existing local residents;
- The site is very wet in winter and holds a lot of surface water plus there are a number of springs - There would be a significant impact on sites below ie Goodmores and Brixington.
- The northern part of the site can only be accessed through a narrow gap (5mtrs) between the ancient woodland and the historic hedge in the adjoining site (Lymp 14). Any road/access would do irreparable damage to the woodland/hedge.
- This area is a wild life haven and development would have a serious detrimental impact on wildlife;
- The Exmouth Neighbourhood Plan specifically stated that it should not be developed due to its historical significance and its ecological value;
- Planning permission was previously rejected on this site (14/3022) and therefore highly inappropriate to bring forward this site into the current plan;
- View expressed that the development would become a satellite settlement (of Exmouth);
- Local MP opposes the plans
- Air pollution will worsen, especially as trees will be lost
- Contrary to the Lympstone Neighbourhood plan where any developments are expected to be in the Built-Up Area Boundaries (BUAB) and their development risks the inexorable process of coalescence between Lympstone and Exmouth
- The development Exmo 04a is contrary to the Exmouth Neighbourhood Plan policy EN1 and the clear wish expressed on p.29 ' the community is clearly indicating these areas are the last that they wish to see development on'. This wish reflects to protect the presence of the protected Barbastelle Bat (S.P. 90) and a number of veteran trees (S.P. 74, 85)
- The proposal to create an employment site within the proposed mixed-use of the sites either side of Hulham Road is not practical. The sites to the north of Hulham Road are divided by the property Sowden Brake that is not part of the proposal and spanning the road is impossible.

- Exmouth Community Association advise - we object to all the suggested housing and employment allocations either side of Hulham Road, primarily because of remoteness from the town's services, not least the town centre. More development in this area should certainly be regarded as premature until such time as the planned Dinan Way link to the A376 has been implemented.

Views in favour of development (at least qualified in favour of development) included:

- A proposal submitted is to build an over 70's complex with 60 homes on a much-reduced Lymp 14 site. With traffic management measures as part of the scheme, including cycling and pedestrian improvements and also to provide a county park on land not being developed. This is considered to be a means to provide some housing without the scale of adverse impacts and also a means to secure community benefits.
- The promoter of site Exmo\_04a considers that this site should be a preferred allocation. It is free from constraints, sustainably located and readily deliverable. Technical details are submitted with the representation.

### **LP\_Exmo\_01 - Estuary side - *Rejected Site***

- No comments

### **LP\_Exmo\_02 - Queen's Drive, Exmouth - *Rejected Site***

- Concern raised that this site would be developed into luxury flats.
- Highlighted that Exmouth's only advantage is its seafront. The town itself is shabby. It was suggested landscape this area and enhance the natural setting for sport, outdoor seasonal entertainment and family recreation

### **LP\_Exmo\_03 - Land at bottom of Bapton Lane - *Rejected Site***

A number of respondents to this site commented on negative impacts that could arise through inclusion in the Valley Park. Some suggested development of a single dwelling on the site would be desirable. Matters raised (including by the landowner who favoured development) included:

- One respondent suggests that the site is of biodiversity value though others contest this point and advise it is not of value – and it is observed that inclusion in the park would lead to adverse impacts on species present.
- It was suggested the site is in some respects it is a brownfield site as it contains the foundations and part of the walls of greenhouses built in the 1970s together with a block constructed store.
- Valley Park inclusion was done many decades ago when the whole of the land forming the remnants of Bapton Farm was so designated. When the Greenfingers site was removed from the Valley Park the logic for site inclusion was lost: the site is now isolated and given its small size, can provide little or nothing to enhance the Valley Park for locals enjoyment of it.
- The land is long and narrow making it of very limited use for recreation. If it were to be opened to the public, it is likely only to be used for toileting dogs. Being small in area that is likely to lead to a build up of faecal material to the point where it becomes a hazard.
- Public access to the site could worsen anti-social behaviour and adversely impact on peace and quiet.
- Secluded and not overlooked- development would cause privacy and security concerns to adjoining residents.
- There is lack of detail in respect how and when the land would be incorporated and what role the land would serve if incorporated

It was also highlighted that:

- The southern pavement of Bapton Lane ends outside 14 Bapton Lane. Development of the site would allow the pavement to be extended toward the pedestrian bridge over the stream thus improving safety for pedestrian
- The existing hedge to the site contains modest trees that nevertheless require trimming at public expense as they are under power lines running to Bapton Farm. A new pavement section would require their removal.

### **LP\_Exmo\_04b- Land at Marley Drive - Rejected Site**

- The Environment Agency advise that a culverted watercourse runs though the site. There is an opportunity to reinstate an open channel with 8-metre buffer free from development.
- It was highlighted the site falls in the Pebblebed Heaths 4000 metre exclusion zone and this is reason to oppose development.

- Application of the 400 metre exclusion zone rule was opposed on the basis of adjacent properties already being in the exclusion zone and the site being separated from the Pebbled Heaths by a busy road.
- It was noted that around 1 hectare of the site is outside of the exclusion zone and it is suggested it is suitable for development (alongside Exmo\_04a).
- The site considered unsuitable for development in representation on account of:
  - distance from services,
  - inadequate infrastructure;
  - Being a wet area of land holding surface water
  - Wildlife value
  - Impacts on roads
  - Leading to more commuting to Exeter – by future residents.

### **LP\_Exmo\_06 - Douglas Gardens - Preferred Allocation**

- The Environment Agency state that areas at risk of flooding fringing the eastern boundary should be set aside for green infrastructure with at least an 8-metre buffer from the watercourse free from development.
- Devon County Council note this site has already come forward through a planning application.
- The landowner supports this allocation which is subject to a current application which has received supportive feedback from Members and is technically achievable.
- Exmouth Community Association object to this site and advise - If it is to be considered for inclusion, the owners should be asked to commit to the creation/safeguarding of a future Maer Valley Park at least providing increased public footpath access between Littleham and the seafront.

Matters of objection to site development included:

- Reduce viability of farming in the Maer Valley;
- Further overload Douglas Avenue with extra traffic;
- Result in loss of open space;
- Cause adverse impacts on the Littleham Brook;
- Lead to adverse landscape impacts;
- Adverse amenity impacts and proximity to a public footpath;
- Loss of an existing house to gain access
- Lack of sewage capacity;
- Contrary to Neighbourhood plan policies;

- Things have not changed since a previous planning application was rejected;
- Existing over development in the surrounding area;
- Site is near to the AONB;
- Lack of on-site parking within site development, exacerbating existing parking concerns on existing roads;
- Visibility concerns at site access road junction;
- Adverse biodiversity impacts;
- This area should be a major new twelve months of the year Holiday Attraction as an Educational and Event location based on 'Regenerative Farming/Rewilding Project' along the lines of the highly profitable Knepp Estate in Sussex.
- Harmful to character and appearance of the area.

### **LP\_Exmo\_07 - Bystock Court - Rejected Site**

- Exmo 07 and 21 are subject to the Exmouth Neighbourhood Plan action EBA1 (p.54) for investigation to create a future conservation area. Both Exmo 08 and 16 are either adjacent to or within the area proposed for designation as a future Littleham/Maer Valley Park (p.34)

### **LP\_Exmo\_08 & 16 - Littleham Fields and land to the rear of Elm Lane - Preferred Allocation**

- The Environment Agency state that areas at risk of flooding fringing the south-eastern boundary should be set aside for green infrastructure with at least an 8-metre buffer from the watercourse free from development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to rising land and impact on LB setting
- The landowner says the site is closely associated with the existing built up area and with other recent developments in the vicinity such as the Plumb Park scheme, free of major constraints and is readily deliverable. It is wholly sensible for the land to be allocated for development in support of the wider approach of optimising the level of growth around Exmouth.



Particular points raised in objection to the development of the site included:

- Development of housing will result in a further scarred landscape;
- Sloping site will mean very prominent properties with imported fill material;
- Loss of natural daylight will result from elevated new properties;
- Vibration impacts will occur during development;
- The site is of biodiversity value and adverse impacts will arise;
- Site access roads are insufficient to meet needs;
- Adverse construction impacts on road quality, noise, dust – leading to negative health impacts;
- Loss of existing home property values;
- It will make the farm, that uses the land, uneconomic;
- Questioning of social housing provision from development;
- Impact on the local distinctiveness and identity of Littleham;
- Increased flood risk from development;
- Adverse impacts on amenity of nearby residents;
- Infrastructure and services will not cope with extra pressure from development;
- Adverse impact on watercourses given proximity to a stream;
- Access through north west corner of site would be inappropriate – potential for access from the south;
- Impacts on AONB and Jurassic Coast;
- Maer Valley should be kept as a green open space;
- Adverse impacts on appeal to tourists;
- Houses built will not be affordable;
- Capacity has doubled- earlier application was for 22
- Security concerns how will adjoining cows be kept off the development
- Will impact on visitors to Sandy Bay
- Access from Elm Lane is narrow and the junction with Littleham road would be dangerous. And when there are church services, Littleham Road becomes in effect a single track road. It is already heavily trafficked, particularly in the peak holiday season from Sandy Bay/Devon Cliffs Holiday Resort. The proposals also prejudice/compromise the implementation of the Littleham/Maer Valley Valley Park (Policy EN3 in the adopted Exmouth Neighbourhood Plan).

### **LP\_Exmo\_10 – east of Liverton Business Park - *Rejected Site***

- Exmouth Town Council members feel that Land Directly to the East of Liverton Business Park is the most acceptable in terms of sustainability. Of the sites proposed for Exmouth.
- The view was expressed that I cannot understand why this site has been rejected as it is close to facilities i.e. shops, tip, bus routes, on a main communication route where development would not interfere with anyone else.
- Site supported for development in that it does not interfere with existing residences, as other sites do.

Particular points raised in objection to the development of the site included:

- Tongue of urbanisation into farm land - this will render the farm in the valley uneconomic.
- Site is isolated and would start to bridge a gap between Exmouth and Budleigh Salterton.

### **LP\_Exmo\_17 - Land to the south of Littleham - *Potential 'Second Best' Allocation***

By way of introduction it is advised that this proposed allocation generated a very high level of comments (objections) with concerns around the appropriateness of development in the AONB being one key consideration that was highlighted by many respondents.

Comments from key agencies and the site promoter included:

- The Environment Agency state that areas at risk of flooding associated with the Littleham Brook and other watercourses should be set aside for green infrastructure with at least an 8-metre buffer from the watercourse free from development. There could be natural flood management opportunities on this site to increase floodplain storage and reduce flood risk to the downstream community.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to the setting of the Grade 2\* Church.

- Devon County Council state multiple ordinary watercourses run through this site North to South which should be considered as part of any proposal.
- The landowner says as well as providing a sizeable amount of housing, development of this land would be well sited close to the existing employment areas. It also offers the potential to provide road and none car connections between both the village of Littleham and Sandy Bay Holiday Park and thereby has the potential to help address traffic issues in the area. The allocation of the northern part of the land for employment use is sensible in that it would relate well to the existing Liverton Business Park and can help to provide balanced growth in the town.
- SWW service reservoir lies below the site. This is much larger than the visible equipment/compound would suggest

Particular points raised in objection to the development of the site included:

- Approach to site assessments in AONBs is inconsistent- numerous other sites in the District have been discounted due to the impact that much smaller numbers of houses would have on the AONB
- Soil at the site is heavy red clay and hard to drain so will generate pooling and flooding concerns (noting climate change considerations);
- Water runoff will increase from development – leading to flooding;
- It was considered that tide locking of the outfall of Littleham Brook into the sea will also occur more frequently due to sea level rise.
- Existing road network can't cope, especially noting impacts and pressures arising from Devon Cliffs Caravan site.
- Surrounding area is a localised area for/of crime - buyers will be let down by the statutory agencies' lack of engagement with the social problems and crime;
- Site is of importance as an area of rurality – relevance to both locals and tourists;
- Adverse urbanising landscape impacts will arise;
- Properties on Capel Lane could be materially affected and subsidence caused.
- The site borders the grade 2\* village church, which is a significant heritage asset and development of the site could have a significant detrimental effect on both the church and the surrounding graveyard and its biodiversity. There are also other grade 2 listed buildings near by as well as HERs at/on the site.
- Many of the graves and certainly the Church, its Tower and retaining wall are historically important and runoff will absolutely affect their foundations;
- The churchyard is reported as being the biggest in Devon and a beautiful, quiet oases of tranquillity;
- There is a 'natural burial' area lying next to the site. Concern raised that the private area for quiet contemplation would be overlooked by poorly placed housing.

- The graveyard is reported as nearly full and land for expansion is seen as needed;
- A public right of way across the site and a cycle path will be adversely affected. The cycle path forms part of the National Cycle Network (Sustrans) NCN2 from Dover to St Austell and the international Tour de Manche between Plymouth and Poole.
- The site was reported as safe for families as children cycle on the current path away from cars, and is in a great location for some of the poorest households in Exmouth to access some greenspace. It was widely appreciated during lockdown. Walkers, runners and other cyclists also access the area as well.
- Housing provided will not meet a local need/not be affordable to locals;
- Site is in the AONB and should not be developed – any building raises broader issues around development in AONBs and the sites is considered important in a wider open landscape setting – including in respect of the coastline and Jurassic Coast; Constitutes major development in the AONB without justification as per NPPF;
- Development would extend the built form of development into the open countryside;
- Exmouth does not have the infrastructure to support site development;
- Site provides existing green infrastructure enjoyed by locals and visitors;
- The site is important for wildlife and adverse impacts would arise from development;
- Ancient irreplaceable hedgerows will be lost to development;
- Site development is not supported by the Neighbourhood Plan;
- Site is considered as similar to other sites that have been rejected as allocations in the local plan (comparative rejected sites are listed in representation) - it is considered inconsistency in approach exists;
- Site is not well connected to the town of Exmouth;
- Footpaths close to the site and along nearby roads are poor.
- It is considered that many social and community facilities are not in easy walking distance of the site;
- The site would make a wonderful Dark Night at Skies protected area due to having very little light pollution facing eastwards and the only light comes from the odd farmhouse.
- Could lead to joining up of Exmouth with Budleigh Salterton;
- Site is rich grassland and loss would impact on farming economy. It is regarded as being of agricultural importance, supporting the farming industry and food production and in representation it is reported as being Grade 1 agricultural land.
- Development will lead to the loss of identity of the historic settlement of Littleham;
- There is a large underground SWW service reservoir below the site.
- Development is being driven by profit
- It would be preferable to develop the fields off to the left as you approach on the path from the bridge on Capel lane
- Castle Lane is a single track lane and is busy in summer.

- Safe pedestrian crossing points cannot be provided on Salterton Road and there are no pavements along the site frontage
- Facilities are more than 1600m from parts of the site
- Adjoins a Grade 2\* listed Church and forms part of its setting. Report says there are no other heritage assets in the vicinity but there are numerous monuments and assets within and adjoining the site and these should be assessed.
- Littleham village should be a conservation area
- Site is bounded by a network of ancient hedgerows which stretch up to the pebblebed heaths. This biodiversity habitat/corridor will be lost as will the large field parcels which house specific species eg corvids
- Exmo 17 should not be included in the Plan (second choice site) apart from the small portion off Capel Lane.
- The Historic Environment Records show there are multiple HER Monuments at and around the site that should be taken into account in assessment.
- Paragraph 177 in the NPPF states when considering applications for development within National Parks, the Broads and AONB permissions should be refused for major development, other than in exceptional circumstances where it can be demonstrated that the development is in the best public interest.

Additional qualified views expressed included:

- Any building here should only occur to the north of the old railway line with easy access from the main road at McDonald's. No development should occur below the old railway line.
- The allocation of this site is another example of the difficulty of finding suitable sites for new homes in Exmouth. The site lies within the AONB but is "relatively" well positioned versus access to the town centre services/ public transport compared to the sites in the NE of the town.
- If EXMO17 is developed it should be only allocated for affordable housing for existing local residents. Far better to push for more brownfield sites within the existing BUAB (disused post office/ police station/ EDDC's Camperdown Terrace Depot etc) and avoid allocating this site.
- Exmouth Community Association object to the allocation of this site but advise - if its inclusion is considered appropriate, the opportunity should be grasped to provide an extension of Dinan Way to give a more direct access for traffic generated by the Devon Cliffs resort at Sandy Bay, in turn removing this same traffic from the centre of Littleham village.

### **LP\_Exmo\_20a - Land at St John's - Rejected Site**

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- DCC welcomes the rejection of this site as it is partly within the Mineral Safeguarding Area.
- The site promoter supports the allocation but does not consider it to be suitable for employment use.

There was objection raised that:

- the top of the site is too close to the common (Pebblebed Heaths);
- there is an Unconfirmed County Wildlife Site at the site;
- traffic infrastructure is lacking and St Johns Road would need widening;
- There would be a loss of countryside;
- Increased traffic would result;
- There is a lack of infrastructure.

### **LP\_Exmo\_20b - Land at St John's - Potential 'Second Best' Allocation**

- The Environment Agency state that this site appears to have had its boundaries altered to ensure they are more than 8m from two main rivers to the south and west of the site's boundaries, which converge on the Southwest corner of the site. The site access does, however, cross the main river and the area of FZ3 associated with it to the west. A safe access and egress route will need to be carefully considered and a flood risk activity permit required.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.

There was objection raised that:

- 150 houses is a significant expansion towards Budleigh. Quite likely the applicant would seek more if permission given.
- Development would weaken the case to refuse development on the Liverton Farm area currently shown Red.
- Lack of infrastructure at the town;
- Houses would be unaffordable to locals;
- Loss of beautiful countryside.

In qualified support of the site:

- A respondent noted the allocation of this site is another example of the difficulty of finding suitable sites for new homes in Exmouth. The site is “relatively” well positioned compared to site EXMO17 and the sites proposed in the NE of the town. T
- EXMO20b it was suggested should be only allocated for affordable housing for existing local residents.

### **LP\_Exmo\_21 - Land north-east of Old Bystock Drive - *Rejected Site***

Exmo 07 and 21 are subject to the Exmouth Neighbourhood Plan action EBA1 (p.54) for investigation to create a future conservation area. Both Exmo 08 and 16 are either adjacent to or within the area proposed for designation as a future Littleham/Maer Valley Park (p.34)

### **LP\_Exmo\_23 - Land to the south of Courtlands Lane - *Potential ‘Second Best’ Allocation***

There was objection raised that:

- This site is in the green wedge,
- The site is in the coastal preservation area,
- It is accessed by a narrow lane and is used by walkers accessing the East Devon way or the Exe trail as well as cyclists,
- It is in an unsustainable location, outside the BUAB.
- This location is highly visible and would damage the landscape and skyline.
- The site is in proximity to National Trust land;
- The A376 can not cope with the current traffic and commuters;

- Exist onto Exeter Road (A376) is dangerous
- Development would join Lypstone and Exmouth;
- Site is well away from Lypstone and Exmouth;
- Other dwellings nearby are either isolated single dwellings or form part of the discrete groups of homes;
- There would be habitat loss and wildlife impacts;
- Development would encourage greater car use to access facilities;

In qualified support of the site:

- There was support for modest development (a respondents advised that as a modest sized site (if well developed) it compared favourably with the adverse impacts that large sites would have;
- Site supported if road improvements to Courtlands Lane could be made;
- It was advised that the site is not in the (existing) Green Wedge or AONB
- Exmouth needs more well planned and designed homes on small and medium scale sites that offer more space and the opportunity to utilise public transport which is close by;
- Site is close to amenities and a cycle track;
- As a small infill site it appears OK with a lot less of an impact than most other proposals for Exmouth;
- A prospective house purchaser in the are favoured development;
- Historic hedgerows could be reinstated that were lost in the past;
- On behalf of the landowner- the site is suitable for 6 or 12 houses (preferably 12). The site is identified as second choice sites, but ultimately it is required to deliver housing numbers and should therefore be a preferred site. An indicative layout and supporting technical information showing that the site is achievable accompanies the representation.

### **LP\_Exmo\_47 - Land west of Hulham Road (south-east of point in view) - Rejected Site**

- A site promoter objects to the non-allocation of the site, which they consider to be well suited to residential development and incorrectly been included in the Register Park and Garden because there is no relationship between the site and the heritage assets. The owner is currently resolving this matter and the heritage concerns should not be considered overriding in the search for suitable land in a sustainable location. If allocated the site will assist the council in making appropriate provision for small sites.



- A respondent advised that many people have said that development could take place as a single strip of housing alongside Hulham Road that would still leave a large space for the setting of A La Ronde. and Point in View.

### **LP\_Lymp\_07 - Land at Courtland Cross - Potential 'Second Best' Allocation**

There were a substantial number of objections raised to the proposed allocation of this land in the local plan.

- Historic England - Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- A site promoter supported the allocation, but does not consider it to be suitable for employment uses, although it could provide community recreational use.

There were objections raised that:

- Lymp\_07 should not be assessed under Exmouth as it is clearly within Lympstone and should be assessed as such. If assessed this way it would not be required, even as a 2nd choice site and therefore not allocated.
- Development is a very serious threat to the identity of Lympstone with potential to “destroy the character and community of the village”.
- The site has been the subject of 3 refuse planning applications including one at appeal (also a single house was refused at appeal)
- This development will have a huge negative impact on the health and wellbeing of Lympstone Parish residents.
- The site does not have easy access to bus and rail services (existing train services are running at capacity);
- The site is remote from employment opportunities
- Car use will be the norm for persons to travel to work on already overcrowded roads.
- There is a lack of infrastructure capacity to cope with development;
- The development will have significant negative effects on the environment.
- Farming land will be lost;
- The Coastal Preservation Area will be built upon and permanently lost – this directly contradicts Council policy.
- The green wedge between Lympstone and Exmouth will be seriously eroded;

- There will be acceleration of the coalescence of Lypstone and Exmouth, destroying the sense of place and identity for residents.
- Development would undermine any separation between Woodbury and Lypstone as settlements and undermines their historic character and identity;
- The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents;
- It would constitute piecemeal development not properly integrated with local communities and infrastructure;
- Valuable wildlife corridors will be lost and there would be adverse biodiversity impacts - fields are bounded by ancient hedgerows and mature trees;
- Biodiversity net gain would not result from development of the site;
- There is potential for adverse impacts on the wildlife at the Exe Estuary (Cirl Bunting were noted as using the site);
- Important areas of landscape and visual amenity will be lost forever.
- The site is not near cycle links (also highlighted that the Exe Estuary cycle trail is already over-run with cyclists and pedestrians);
- Development is contrary to the Lypstone neighbourhood plan;
- Existing schools are already over-subscribed;
- Lypstone village, in particular, lacks infrastructure – including limited facilities and parking and narrow roads;
- Adverse landscape impacts would arise;
- Lypstone has inadequate drainage and sewage provision, and extra development would place extra pressure on systems with flooding and increase d sewage releases;
- The A376 is already congestion and development would add to this;
- No information exists to show the costed resources needed to sustain such a housing development;
- Concern that any houses built, given underlying land values, would not be affordable for local/key workers;
- Adverse impacts would occur on adjacent heritage assets;
- Local community opposition to development should carry weight in the rejection of the site as a development option
- Part of the East Devon Way runs through this site. This route is described as "the perfect way to discover the hidden gems of the East Devon Area of Outstanding Natural Beauty" (<https://www.eastdevonway.org.uk/>)
- Adverse landscape impacts would arise, the site is prominent on the skyline;
- Scepticism was expressed in respect of developer "promise" of new sports facilities;
- Light pollution would arise from development;
- Development would have adverse health impacts on nearby existing residents;

- The National Trust highlight importance assets that they own at Exmouth, both countryside and built heritage. They stress the heritage importance of A la Ronde and landscape relevance of Lower Halsdon Farm. The National Trust reiterate past objections that relate to the potential for development of Site Lymp\_07, specifically noting landscape sensitivity concerns.

In qualified support of the site:

- A respondent advised it has access off the main road which is important;
- It was suggested that some parts of the site maybe suitable for development (better than other options);
- It is not good agricultural land.

### **LP\_Lymp\_08 - Land off Summer Lane - *Potential 'Second Best' Allocation***

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.

There were objections raised that:

- Development directly contradicts the findings of the government inspector who refused the building of a single house in this area.
- Development would be a very serious threat to the identity of Lympstone.
- This development, in conjunction with others, will have a huge negative impact on the health and wellbeing of Lympstone Parish residents.
- There is not easy access to bus and rail services;
- Access to employment opportunities is poor.
- Car use will be the norm for persons to travel to work on already overcrowded roads.
- The current infrastructure struggles to cope.
- The development will have significant negative effects on the environment.
- Farming land will be lost.
- The green wedge between Lympstone and Exmouth will be seriously eroded;
- Development will accelerate the coalescence of settlements, destroying the sense of place and identity for residents.

- The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents.
- Valuable wildlife corridors will be lost.
- Important areas of landscape and visual amenity will be lost forever;
- Site lies on the alignment of Dinan Way extension and land should be safeguarded for the road;
- Potential for adverse impacts on the setting of the listed Al La Ronde;
- There is a lack of demand for housing in Lypstone village – it is suggested the Government advise that houses should not be built where there is not a demand
- The site is in the Green Wedge;
- No development should be allowed on this side of Hulham Road as once it starts it could continual and have a major impact to the landscape and wildlife.
- This development will be seen from Lypstone visually and be a blot on the landscape.

### LP\_Lymp\_10b - Land off Hulham Road - *Rejected Site*

This site, noting 10b forms a northern part of a larger HELAA submission, lies to the north of land that is shown as a proposed allocation in the draft local plan.

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.

There was support for not allocating this site with a suggestion it could be made part of a country park. There were objections raised to potential development that:

- Allocation would extend development into the countryside;
- Hulham road can't take the traffic without widening;
- Woodbury road turn off is already blocked;
- It would result in more traffic going through Woodbury;
- In Exmouth sewage catchment that cannot cope. A new WWTW is needed to the North West.
- The site is next to Yonder Wood (Site being developed by the Woodland Trust) so would be strange to build houses next to it.
- There is poor pedestrian access to the site;
- The site is considered undeliverable (noted by the HELAA panel);

- Site is remote from the centre of Exmouth;
- Facilities are on the edge of acceptable walking distances;
- Any properties built would be unaffordable;
- Any residents would be liable to commute to Exeter;
- The site has clear views of the Estuary – so would have negative landscape impacts;
- The site is of biodiversity value - forming part of wildlife corridor between the Pebblebed Heaths and the Exe Estuary;
- Property is near listed building (Exe View House) and any development would be detrimental to this property;
- The site should form part of the extended Green Wedge of Lympstone to both prevent Coalescence with Exmouth;
- Brixington's existing infrastructure is struggling;
- Exmouth lack secondary school places;

### **LP\_Lymp\_12 - Land north of Summer Lane - Rejected Site**

This substantial site on the northern side of Exmouth is not proposed as an allocation in the draft local plan. There was support for not allocating this site and objections raised to potential development that:

- Development would have adverse landscape impacts;
- Adverse impacts on the heritage assets of A La Ronde;
- The site is/forms in a Green Wedge between Lympstone and Exmouth;
- Vehicle access is onto a narrow lane and to a main busy road;
- Development will create flooding problems;

### **LP\_Lymp\_13 - Kings Garden & Leisure, Higher Hulham Road - Rejected Site**

The Kings Garden centre lies on the northern edge of Exmouth and is not allocated for development in the local plan (the site is occupied by an operational business). The site adjoins land that is allocated for development in the plan on the north eastern edge of Exmouth. There was support for not allocating the site and objections raised in respect of potential for development included:

- Over development of the area;
- This is a very valuable thriving business that is used and provides a beneficial service/facility;

- Development will cause massive floodings in Lypstone and on the main road;
- Development will cause loss of habitat of the wildlife that live in harmony with the garden centre;
- Lack of infrastructure,
- Lack of employment;
- Very poor road links to Exeter where most will look for work.

### Omission sites at Exmouth

- The landowner supports Land to the East of Liverton Business Park (Exmo 18) being proposed for three hectares of employment use. This allocation will help the Estate to continue to deliver new jobs through its existing development of the Estate's adjacent Business Park. Notwithstanding our concerns, set out above, about the lack of settled evidence on the overall form of employment need, the location of Exmo 18 alongside existing and successful employment uses and its site adjacent to the most important town in the District strongly suggests that development of this land for employment can make an important contribution to the District's economy.
- To deliver what is required, greater consideration should be given to allocating more sustainable sites within the existing BUAB sites with a major focus on providing affordable housing for local residents e.g. re-development of the head of Camperdown Creek site (Exmouth Neighbourhood Plan p.67), the disused police station and post office and the southern section of site Exmo 20 adjacent to the Liverton Business Park and the solar farm.
- The owner supports land at Marley Hayes, Hulham Road, Exmouth EX8 5DZ (what3words ///rooms.clock.figure) as being suitable for up to 80 houses. This comprises a field of approximately 4.5 acres, fringed by woodland, the driveway leading to it and a small area of approximately 0.3 acres at the entrance to the driveway adjoining Hulham Road.

## Policy 21 - Honiton and its future development - General issues

- The East Devon AONB team request that Policy 21 should be amended to refer to the need for LVIA or landscape assessment as part of any details being brought forward on specific sites. Attention is drawn to the outstanding landscape setting of both the Blackdown Hills AONB and East Devon AONB.
- National Highways anticipate that the strategic road network can accommodate the level of growth proposed but expect a high-level transport assessment as evidence for the Local Plan.
- Devon County Council (DCC) state Honiton Community College will require expansion to meet the needs of proposed development in the area.
- DCC support development at Honiton and suggest some of the second choice and rejected sites should be reconsidered given the close proximity of existing facilities.
- Turk's Head junction and the A30/A35 roundabout will need to be assessed in light of the proposed development.
- Honiton is the "capital" of East Devon and needs more development, especially social housing. More social housing close to schools and shops would be beneficial to the town's residents.
- disappointed that the town's development is leaning towards the west, and that there is no mention of an eastern bypass.
- Millwater School site proposed for housing, contrary to previous understanding that it was for Littletown Academy expansion.
- Honiton needs to grow to survive. The town centre is geared toward the older resident population, which is unsustainable. A slightly larger population would encourage investment and improve employment and leisure facilities. Most of the Honiton's housing stock was built after 1970, so residents who oppose growth should be aware that their houses were once green fields.
- Honiton's new housing should reflect the town's historic architecture. Bus links need to be improved, especially with the railway, and bus services to places not served by public transport need to be protected by funding from developer contributions. Because of the hills, cycling is a bit trickier, but having regard to cyclists through the creation of safe cycle routes to the town and railway station would be good.
- Honiton needs more economic land to support its growing population and economy. The Heathpark Estate is almost fully occupied, and the Ottery Moor Industrial Estate was lost to housing. The proposed development of industrial land to the west of Honiton is essential to providing local jobs.
- Honiton needs improved transport infrastructure, including railways, public transport, and roads. The Dowell Street junction is particularly problematic due to high traffic levels and illegal air pollution. A western bypass linking the A373 to the A30 would be a good

solution, but development in the area must be prohibited until traffic infrastructure issues are resolved.

Nb. Devon County Council's consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.

### **LP\_GH/ED/39a - Land south of Northcote Hill - Preferred Allocation**

- The Environment Agency advise that has an area of FZ3 to the northeast of the site. This area should be set aside as GI, with a buffer of at least 8m from the watercourse, free from built development.
- DCC understand there is a culverted watercourse that is potentially not accurately mapped on existing maps – opportunities to enhance the existing watercourse should be sought which may be include daylighting the culvert.
- The Site promoter supports the development of 100 homes in GH/ED/39a and 240 homes at GH/ED/39b, and proposed the development will include a local centre, public open space, and allotments/community garden.
- Honiton Town Council agreed this Brownfield site is a suitable location for development.
- A high number of representations from the residents of Otter Valley Park. They objected the GH/ED/39a site, and have following concerns regarding the proposed development:
  - The siting of the taller and more expensive 4-bedroom units could be closer to the boundaries of the park and disrupt the privacy and tranquillity of the residential park, also would have a visual impact for the existing houses. The park is home to many older residents, who are attracted to the privacy and tranquillity of the area.
  - The development could impact the existing utility supply to the park, as well as street lighting and emergency and firefighting equipment.
  - The current traffic in the area is already unacceptably high, due to the traffic from the A30/A35. The proposed development of additional housing would only make the traffic even worse.
  - The risk of fire in the existing timber-framed home due to the new large housing estate nearby. There are concerns regarding the chance of bonfires, barbecues, and fireworks in the area, which could pose a fire hazard to the existing home.
  - Noise and the other impacts from the construction (including the new road/ existing road widening) would directly affect existing residents' life and all the residents' age above 50.



- The proposed development of new housing would devalue the existing park homes in the area. Existing residents are concerned that they will not be able to sell their homes if the development goes ahead.
- The development would require the construction of a new 2-lane road, cycle track, and pedestrian path, which would disrupt the residents of Otter Valley park.
  
- Multi-generational housing estate is not suitable for the needs of the area. The land should be used to expand the retirement village instead, as this would be more in line with the needs of the current residents and would have a smaller impact on the environment.
- The local facility such as GP surgery are already over capacity and there is no provision to resolve this.
- Development at the northeast edge of Honiton, which is closer to town centre and facilities compare with those sites in southwest Honiton.
- The development would be located close to a railway line, which would pose a noise and safety hazard to residents.
- The proposed site would be a better option for housing than the designated AONB sites. It is a lovely place to live, within walking distance to the town, and the best place to put houses in Honiton.

### **LP\_GH/ED/39b - Land south of Northcote Hill - Rejected Site**

- Site promoter supports the development of 100 homes in GH/ED/39a and 240 homes at GH/ED/39b, and proposed the development will include a local centre, public open space, and allotments/community garden.
- Honiton Town Council stated that this site is suitable for development in line with GH/ED/39a. They believed that the land allocated for solar energy at Hale Farm is suitable for development.
- The development would be located close to a railway line, which would pose a noise and safety hazard to residents.
- The local facility such as GP surgery are already over capacity and there is no provision to resolve this.
- Development at the northeast edge of Honiton, which is closer to town centre and facilities compared with those sites in southwest Honiton.

### **LP\_Gitti\_03 - Land south of the A30, west of Honiton - Proposed Employment Allocation**

- National Highways note this site is adjacent to the A30, and presume these sites will be accessed by the Local Highway Network.
- Gittisham Parish Council objects to the 15ha employment allocation west of Hayne Lane. The council believes that the development would be too large, detrimental to the landscape, and would require significant investment in infrastructure. The council also believes that the development would increase flooding in the area.

### **LP\_Gitti\_04 - Land and south of the A30, west of Honiton - Proposed Employment Allocation**

- National Highways note this site is adjacent to the A30, and presume these sites will be accessed by the Local Highway Network.
- Gittisham Parish Council objects to the 15ha employment allocation west of Hayne Lane. The council believes that the development would be too large, detrimental to the landscape, and would require significant investment in infrastructure. The council also believes that the development would increase flooding in the area.
- Developer (Combe Estate) support the site allocation.

### **LP\_Gitti\_05 - Land west of Hayne Lane, Honiton - Potential 'Second Best' Allocation**

- DCC note there are several ordinary watercourses within this site which have required significant works downstream to manage associated erosion.
- Woodland Trust advise that trees on the Ancient Woodland/Ancient Trees inventory (ref Veteran Pedunculate Oak (ATI no: 114363)) are within the site. Please ensure that necessary protections are in place for these trees and ancient woodland sites, including suitable Root Protection Zones and buffer zones of at least 50metres between any development and the ancient woodland. Please ensure that no development will take place which will adversely impact irreplaceable habitats according to the NPPF.
- Honiton Town Council stated the allocated site is too big and encroaches into the AONB. They would support a smaller site, restricted to the east and out of the AONB.
- Gittisham Parish Council objects to the proposed allocation LP\_Gitti\_05, which would see 31 new homes built on land near Gittisham village. The council has a number of concerns about the development, including its impact on the setting of the village and

the AONB, its impact on traffic and infrastructure, and the lack of provision of community facilities.

- Developer (Combe Estate) support the site allocation and introduce 3 development proposals for the site
- The developments would add an additional 200 homes to the area, which would put a further strain on the roads and other amenities.
- The development would have a detrimental visual impact to the AONB and on the setting of the AONB.
- The development would destroy wildlife habitats and damage the natural beauty of the area.
- The development would have a detrimental impact on the setting of Gittisham Village and its conservation area.
- The development would be located in an industrial area, which is not appropriate for residential development.
- Distance from town centre, schools, health centre/hospital, train station and commercial centre will result in car travel resulting in an unsustainable development.
- It is not appropriate to increase further residentially generated traffic and pedestrian movements through an industrial estate.
- Highways, sewers, and sewage treatment infrastructure already at capacity
- The proposed development would further increase flooding in the area. The author believes that the development would make the problem worse because the river catchment in the area is already very reactive to flooding.
- The actual area proposed for development must be clarified before any proposals are made.
- The current emergency access to the Hayne Farm estate is very poor, and it would only get worse if the proposed development went ahead.
- Meadow Acre Road, which is currently the main access route to the area, is already too narrow and crowded with vehicles. And the access routes from Hayne Lane and the Industrial Estate are not ideal.
- Those recently built housing has had a detrimental environmental impact and impact upon the beneficial qualities such as “Dark Skies”.
- No “exceptional circumstances” that would justify allowing this development. More suitable sites available for development in Honiton such as brownfield sites.
- The allocation of any part of Gitti\_05 site would be contrary to Objectives 7-9 and 11 of the local plan.
- New developments are far from High Street, so active travel links are needed to prevent people driving to Tesco and harming High Street businesses.
- Social housing is needed in Gittisham.

### **LP\_Gitti\_06 - Hayne Farm, Hayne Lane, Honiton - Preferred Allocation**

- Developer (Baker Estates) support this allocation as a logical continuation of the estate under construction to the north.
- Developer (Baker Estates) state allocation should be amended to about 36 dwellings rather than 31, reflecting the outline planning application (22/1322/MOUT) (now approved subject to s.106).
- Honiton Town Council supports the allocation.
- The developments would add an additional 200 homes to the area, which would put a further strain on the roads and other amenities.
- The area is designated as an AONB, which means that it is a special area of outstanding natural beauty.
- The development would destroy wildlife habitats and damage the natural beauty of the area.
- New developments are far from High Street, so active travel links are needed to prevent people driving to Tesco and harming High Street businesses.

### **LP\_Honi\_01- Land at Heathfield, east of Hayne Lane, Honiton - Potential 'Second Best' Allocation**

- Honiton Town Council objects to the proposed development of this site because it is within the AONB and would adversely affect the landscape and ecology. Two previous planning applications for the site have been refused, and the reasons for refusal are still valid.
- Most of the representations concerned the site is in an Area of Outstanding Natural Beauty and would have a negative impact on wildlife
- A high number of representations object Honi\_01 allocation, including a petition signed by residents in the existing neighbourhoods. Most of the residents concerned the existing roads are not suitable for increased traffic, and Honeysuckle Drive would become a main access road causing increased traffic, loss of privacy to residents and increased noise levels. Also, it is not feasible for this small road to handle an additional 300+ cars; Old Elm Road is a small road that is already in poor condition. If it is used as an access route for the proposed development, it would create chaos for thousands of residents and the road would become unusable; Hayne Lane is a narrow, unpaved road that is in need of repair. It is already heavily used, and the proposed development would only make it worse.
- Gittisham Parish Council is also concerned about the access to LP\_HONI\_01. This proposed allocation is outside the parish but would be accessed through Gittisham Vale.

The council believes that it is not appropriate to increase traffic and pedestrian movements in this area.

- Gleeson Land supports the allocation of the Honi\_01 site as a housing allocation meeting local housing need in Honiton. They believe that a landscape-led development can be brought forward on the site, which would be well integrated into the landscape and would create a softer, more sympathetic edge to Honiton in this location, enhancing the Area of Outstanding Natural Beauty (AONB). They suggest that the Honi\_01 site is deliverable within the first five years of the plan period.
- Gleeson Land believes that there are wider opportunities to bring forward additional housing growth in the Honiton area. They have provided a landscape capacity plan for the fields to the west of the Honi\_01 Site, which they also control, and suggested that a comprehensive development on these sites would not harm the landscape and would enhance the AONB.
- No direct access to any roads, so new access roads would need to be built across fields in the AONB.
- The existing sewerage and drainage systems are already overloaded, it would increase flooding and sewage discharge issues in the area.
- The subject site was refused, the decision should remain as the reasons for refusal still apply today.
- There are general concern from the representations regarding the local facility such as GP surgery and local schools are already over capacity and there is no provision to resolve this. Honiton has already lost public toilets due to a shortage of funding
- The development would not be in keeping with the surrounding area, which is mostly bungalows.
- Water pressure is an issue in Heather Close and this site is higher and closer to the water reservoir, which will cause pressure issues unless additional pumping facilities are provided.
- Honi\_01 is located next to a flood-prone brook. The development would increase the risk of flooding to existing properties by increasing surface water runoff and blocking the brook's natural drainage path.
- Honiton town centre does not have enough car parking space
- The proposed site is home to a variety of protected species of wildlife, including barbastelle bat and 7 RSPB priority species. The development of the site would have a significant impact on the ecology of the area, including the loss of foraging and breeding habitat for bats, the loss of nesting and feeding habitat for birds, and the disturbance of newts during their breeding season.

### **LP\_Honi\_02 - Land at Blackdown House, Honiton - *Rejected Site***

- No comments

### **LP\_Honi\_04 - Land lying to the north-east of Heathfield Manor Farm, Honiton - *Rejected Site***

- Agree with the status of 'rejected', the land lies within the AONB and would have a high visible impact on the area if developed

### **LP\_Honi\_05 - Land to the north and south of King Street (including former Foundry Yard), Honiton - *Potential 'Second Best' Allocation***

- The Environment Agency advise that the site is bisected by main river, but flood risk is not acknowledged in the policy. The site would need to be subject to SFRA2, and the sequential and exception tests before being allocated. If the site can pass the sequential and exception tests it should be supported by a masterplan, informed by the SFRA2, to secure a reduction in flood risk and environmental enhancements.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. It would be particularly interesting to appreciate why you consider this to be unacceptable for heritage reasons
- Honiton Town Council satisfied the proposal but subject to appropriate flood mitigation.
- Pedestrian walk through on this development from the High Street would be desirable so that Mill Street (which has limited footway) need not be the only link at this end of town.
- The site should be use for a new central car park to become a community space or market place

### **LP\_Honi\_06 - Former Millwater School, Bottom Road, Littleton, Honiton - *Preferred Allocation***

- Devon County Council, as landowner, supports allocation as a brownfield site within the urban area with good access to local facilities and transport options.
- Honiton Town Council supports allocation.

- The site could be used to expand Littletown School
- Brownfield site development is a good way to reduce urban sprawl and create new housing in areas where needed. The development of this site would be a positive addition to the area.

### **LP\_Honi\_07 - Land adjacent to St Michael's Church, Honiton - *Potential 'Second Best' Allocation***

- Historic England - Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- DCC note this site is within a steep area of Honiton, so infiltration may not be appropriate and would likely need to drain to a surface water sewer via a sewer requisition as there do not appear to be any watercourses in the vicinity.
- Honiton Town Council is concerned about the negative impact that the development could have on the landscape, heritage, and AONB.
- Site promoter support the allocation, but given the ability to deliver the site immediately, the site should be considered a preferred option.

### **LP\_Honi\_08 - Land at the south side of The Glen, Honiton - *Rejected Site***

- No comments

### **LP\_Honi\_09 - Former Honiton Showground, Langford Road, Honiton - *Rejected Site***

- Agent on behalf the site owner argues that the SA has dismissed Honi\_09 too simplistically. They believes that Honi\_09 is a suitable site for development, and that it would not have a significant negative impact on the AONB landscape due to its low-lying location and surrounding infrastructure.

### **LP\_Honi\_10 - Land at Ottery Moor Lane - Preferred Allocation**

- National Highways recommend the policy text includes consideration of noise and visual intrusion impacts from the A30, to ensure the well-being of future residents.
- Honiton Town Council believes that the development of Honi\_10 would result in the loss of a green space that acts as a buffer between the new estate and the A30. The council also believes that the location is unsuitable for housing due to the proximity to the A30.

### **LP\_Honi\_12 - Land on the south-east side of Cuckoo Down - Lane and land at Lower Marl pits Farm, Honiton - Rejected Site**

- Agree Honi\_12 as rejected site, as this open green space is a valuable recreational resource and a scenic spot that should be preserved.

### **LP\_Honi\_13 - Middle Hill, Church Hill, Honiton - Potential 'Second Best' Allocation**

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Potential impact on Grade 2\* Church
- DCC note this site is within a steep area of Honiton, so infiltration may not be appropriate and would likely need to drain to a surface water sewer via a sewer requisition as there do not appear to be any watercourses in the vicinity.
- Honiton Town Council does not support the development of this site as it will adversely impact on the landscape, the adjoining heritage asset and the AONB.
- Local residents are concerned about the proposed development of a site within the AONB and the impact of the development on the landscape, the historic St Michael's Church, and the immediate local residents.
- Development will worsen traffic congestion, as the junction from Parsonage Lane to lower Marl pits Hill is already treacherous for vehicles and pedestrians.



### **LP\_Honi\_14 - Hurlakes, Northcote Hill, Honiton - *Potential 'Second Best' Allocation***

- The narrow rail bridge on Northcote Hill needs to be managed to allow for a pedestrian and cycle way to join with Monkton Road - and as the slip road from the A30 joins there, a segregated bi-directional cycle way on the south side would be beneficial also to GH/ED/39a
- Honiton Town Council suggested Honi\_14 should be a preferred option.

### **Omission sites at Honiton**

- None recorded.

## Policy 22 - Ottery St Mary and its future development - General issues

- Devon County Council (DCC) state there is insufficient primary education capacity to support the proposed level of development in Ottery St Mary.
- DCC understand the King's School is unwilling to expand unless it has a new school building and does not agree that the allocated land can facilitate the expansion of King's School.
- DCC state the town has most facilities and is a short distance to rail stations at Feniton and Whimble so support additional development – there are lots of rejected sites which could accommodate additional housing instead of a new community.
- The majority of respondents object to further development on the basis that there is insufficient infrastructure (roads, public transport, health and education) to meet existing residents needs and no capacity for further growth.
- Many respondents expressed concern at the inadequate existing road network into and through the town, with lack of pavements and single width carriageways being of particular concern
- The Town Council and West Hill Parish Council feel strongly that a disproportionate number of houses have already been built in the town (increasing by 25% (700 houses) over the past 10 years) and allocations are higher than those in other towns with more facilities and better public transport links. They reiterate the concerns regarding lack of infrastructure and point out that the town has a very large hinterland which also relies on the towns facilities.
- The Town Council request that a site for the new Tipton St John primary school is found within the village.
- The East Devon AONB team state that any development that is proposed on the south and west (note- should this be East?) need to be carefully considered as to the effect that may have on the character and appearance of the AONB. Policy 22 should include wording to say that any proposal should be supported by an LVIA or landscape appraisal to consider the effects.
- National Highways anticipate the strategic road network can accommodate the level of growth proposed at other Main Centres, Local Centres and Service Villages, but expect a high-level transport assessment for the entire Local Plan to provide evidence.
- West Hill PC state there should be a Green Wedge over the whole area of Policy NP4 in Neighbourhood Plan to protect the separate identities of West Hill and Ottery.
- No extra employment land is needed, there is unused capacity on existing sites

Other comments include:

- Proposals do not meet the requirements of the made neighbourhood plan.

- Strawberry Lane is narrow with no pedestrian walkway. The strawberry Lane sites will have an impact on flooding in the area and can impact the cricket club and surrounding area.
- It would be useful for EDDC to give the build density, houses per acre, for more meaningful comments.
- Housing needs to be affordable to local people. More executive homes aren't needed.
- Roads into and within the town are inadequate and too narrow for further traffic.
- Schools are at capacity so children travel elsewhere, increasing traffic on the roads.
- Inadequate local employment so commuters increase traffic to and from the town.
- Public transport is inadequate. Further reductions to service mean it can't meet needs of existing residents. Housing to the west of the town will not be well served by buses.
- Object to development of good quality agricultural land for housing.
- Concern that wildlife will be impacted by building and loss of habitat. Networks of trees and hedges should be integral to new design.
- The Doctors Surgery is over capacity and there are no NHS dentists.
- Town centre architecture needs to be preserved and maintained, especially the small cottages which are falling into disrepair.
- More car parking is needed in the town centre for shoppers and residents.
- The Local Plan should reflect the need for true social/affordable housing along the lines of former council and housing association provision.
- Proposed drainage of the Thorne Farm site using part electric pump is doomed to be a disaster with a potential flood risk to homes below this site.
- Sites to the west make sense in terms of access.
- Further development along the Sidmouth Road should not be permitted, the road is busy, inadequate and dangerous- especially to pedestrians.
- Recently approved new quarry off Exeter Road will generate heavy industrial traffic that will impact on road capacity/speed/safety as will the associated new animal crossing. This should be taken into account before increasing road usage from new residents

Nb. Devon County Council's consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.

### **LP\_GH/ED/26- Land west of Cadhay Lane - Rejected Site**

- Devon County Council support rejection of this site as within Mineral Safeguarding Area.
- Ottery is less restricted than most for growth.

- This site does have some issues regarding visual impact but this could be overcome by good design and tree planting.
- The site promoter objects to the failure to allocate this site for housing and considers this to be unsound given the prevailing evidence regarding this site and the fact that adjoining land with similar characteristics is allocated for development. All of the negative effects of allocation could be mitigated.
- The site promoter considers that a portion of the site could be allocated and now proposes that the eastern section only be allocated for housing.
- Separation between West Hill and Ottery would still be maintained and the two sites wouldn't have views of each other because of the established woodland.
- No flooding problems.
- Disagree with any further development in Ottery St Mary
- This land is in the middle of the Settlement Containment zone defined in the adopted Neighbourhood Plan, and development would lead to the coalescence of Ottery and West Hill.
- Object to development of good quality agricultural land
- GH/ED/26 and LP\_Otry\_01 should be split and considered on a field by field basis rather than discounted due to their size. This would overcome concerns about the size of site, projection into the countryside and settlement coalescence
- This site performs better than LP\_Otry\_01 in terms of topography, visibility, landscape impact, and access to services. The eastern part of GH/ED/26 should therefore be allocated for housing and could deliver up to 200 homes.

### **LP\_GH/ED/27- Land south of Strawberry Lane - Preferred Allocation**

- The Environment Agency advise that the site has a significant area of FZ3 at the southern end of the site, which is not acknowledged in the policy. The site would need to be subject to SFRA2, and the sequential and exception tests before being allocated. If the site can pass the sequential and exception tests the area at risk should be set aside as GI, with a buffer of at least 8m from the watercourse, free from built development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Woodland Trust advise that trees on the Ancient Woodland/Ancient Trees inventory (ref Veteran Pedunculate Oak (ATI no: 170156)) are within the site. Please ensure that necessary protections are in place for these trees and ancient woodland sites, including suitable Root Protection Zones and buffer zones of at least 50metres between any

development and the ancient woodland. Please ensure that no development will take place which will adversely impact irreplaceable habitats according to the NPPF.

- The promoter of the land supports the allocation
- There is no sensible pedestrian access into town from this direction and poor vehicle access.
- No foot path link so strawberry lane will be dangerous to pedestrians
- This is beautiful, elevated green space and development will blight views from the town
- Will detract from the historic setting and character of the town
- Lack of infrastructure for existing residents- Dr's, dentists, school places etc
- Heavy existing congestion in the area
- Contrary to neighbourhood plan policies
- Reasons for refusing previous planning applications still stand
- Precedent for small domestic development being refused as detrimental to countryside
- Development would increase the flooding risk for residents of Salston Barton
- Impact of continued construction noise for the residents of Salston Barton.
- Existing obligations, e.g. road maintenance have not been met by landowner. Further development will exacerbate these issues. Suggests future planning obligations won't be met.
- Existing residents will lose privacy and rural setting of their homes
- Significant loss in value of existing homes xx
- Strawberry Lane is already over capacity
- Development will have a large ecological impact on the natural environment. Plans contain errors, omissions, and inconsistencies.
- Existing empty homes within Devon should be reused
- Flood Risk- existing issue, extra run-off will make this worse.
- Existing resident concerned that their underground basement well requires pumping during heavy rain and this will be more frequent as run off increases from development. This will impact adjoining houses. Developer needs to incorporate mitigation into the plans.
- Pedestrian routes into town around the area are already compromised with insufficient footpaths / areas where pedestrian access is via the roadway - the footpath muted when the Bovis Kings Reach estate was built not having come to pass.
- It is very rural in character not semi rural and does a town need rounding off.
- Drains are at capacity
- Roads are single vehicle width and flood impassably.
- Will lead the hamlets to coalesce
- This is rural land that provides a beautiful natural habitat and green space amongst what is rapidly becoming a built up urban area.
- Will significantly impact views from across the valley.

- The objectivity of the Sustainability Appraisal is compromised if its author has promoted an unpublished objective (to join OSM with the hamlet of Salston) rather than appraised the constraints.
- Construction noise for many more years above the 7 years construction for Kings Reach
- Mental health impacts including noise and fear of flooding
- Water quality impacts on the R. Otter
- Possible land stability for properties at Salston Barton
- Significant visual impact from East Hill AONB, whilst most of Salston is hidden in lower ground
- Concern expressed re probity and inconsistency as other sites with the same or lesser constraints have been discounted
- Concern that bringing forward small parcels/sites avoids the need for EIA but the effects should be considered cumulatively
- This site is heavily constrained by many overhead services
- Site does not have a deliverable pedestrian cycle link to the town centre.
- Lovely safe green space with a sociable footpath for meeting neighbours and for dog walking, it has lovely wildflowers, old native mixed hedges and ancient and veteran oak trees. If it's soil health (porosity and no compaction) is good, it is an essential water capture site to prevent run off into existing homes.
- Sewerage at Salston Barton – Houses 11 to 14 have soakaway system that requires the paddock adjacent to the drive (part of LP Otry 10).
- Houses 1 to 10 have a bacteria digester system. This is at maximum capacity and can be overwhelmed if there is too much runoff getting onto the system.

### **LP\_GH/ED/29a- Gerway Farm (East) - Potential 'Second Best' Allocation**

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- A site promoter described the assessment exercise that identified it as a '2nd' choice site as flawed and considers the site to be unconstrained, available and deliverable. It has been overlooked in favour of less sustainable, less viable and less deliverable sites elsewhere around the settlement.
- Several objections on the basis that existing pedestrian access along Tip Hill is very dangerous, especially for children walking to school.
- Numerous objections state that more houses will increase traffic on narrow and dangerous roads into the town This field is realistically quite well suited to further

development it has good access from the main road which Highways were happy with when the Gerway Close was approved no too long ago. Its size dose tend to naturally act to reduce the speed of traffic.

- The wildlife is pretty bland in the area
- There is a regular bus service from walking distance away.
- Site has the capability to provide good pedestrian links into town as well as the open countryside for people's health and wellbeing.
- It sits in sloping ground away from the road and the houses on the Winters Lane /Oak Close together with Clairemont Field will still dominate the skyline providing this potential development will limit landscape issues.
- Surface water from any development must be controlled to a rate of natural run off and this site has a route to the river which doesn't interfere with any other properties.
- It is walking distance to most services in town and the primary school.
- This would provide a compact development extension to Ottery St. Mary
- In all given the location of this site I feel it has a lot to offer for a sustainable development.
- Object to loss of good quality agricultural land
- Development should be concentrated on Exeter side of the town, otherwise commuter traffic has to go through the town
- Unacceptable impact on wildlife
- The stream which runs between Gerway and the properties of Claremont Field already floods, futher run off will increase the existing damage/erosion to properties and gardens in Claremont.
- Inadequate infrastructure for more residents in OSM. Schools doctors dentists all full.
- Site access onto narrow country lane is unsafe
- Area is criss-crossed with electricity wires on poles and small pylons.
- Buffer should be left adjacent to hedgerows
- Landscaping is needed to minimise visual impact for Gerway Close house owners.
- The promoters of the site state that land is unconstrained and readily developable with the access already formed. It is the closest of all of the proposed allocations to the town centre and to the services and facilities within OSM with excellent pedestrian and cycle connectivity. It should be elevated from a Second Choice Allocation to a Preferred Allocation, increase the flexibility and deliverability of the Plan. There is no sound reason why this should remain as a Second Choice.

### **LP\_GH/ED/29b- Gerway Farm (West) - Rejected Site**

- Several supporting comments saying that the site is well located, within walking distance to town/ shops schools bus stop etc. And this will help reduce traffic movements.

- The site is not visible from the main road so is a good option for development.
- Highly visible in the landscape
- Good potential highway access
- The wildlife is pretty bland in the area partly because of few field boundary's to it.
- There is a regular bus service from walking distance away.
- It has the capability to provide good pedestrian links into town as well as the open countryside for peoples health and wellbeing.
- It sits in sloping ground away from the road and the houses on the Winters Lane /Oak Close together with Clairemont Field will still dominate the skyline providing this potential development will limited landscape issues.
- Surface water from any development must be controlled to a rate of natural run off and this site has a route to the river which doesn't interfere with any other properties .
- This would provide a compact development extension to Ottery St. Mary which is an established settlement and lessen the further need for a new town.
- Part of this site, the eastern-most site, has already had planning applications refused, and there is a current live planning application. It is quite unsuitable, mainly because of the poor pedestrian access and highways impact.
- Object to development of good quality agricultural land
- Several objections on highway safety grounds
- No safe pedestrian link into the town from this site

### **LP\_GH/ED/30- Sidmouth Road, Junction with Gerway Lane - Rejected Site**

- Several objections to any further development along the Sidmouth Road on highway/pedestrian safety grounds
- The narrow, winding lane southwards towards Bowd is already busy (particularly during school term times) and includes farm vehicles, school buses and large lorries- difficult to pass and lots of reversing/tailbacks.
- The road along Winters Lane/Longdogs Lane junction is very dangerous
- Tip Hill is a busy road with effectively one way traffic due to parking on one side, pavement is so narrow pedestrians have to pass in the road
- Insufficient infrastructure to accommodate more residents
- The promoters of the site state that land is unconstrained and readily developable with the access already formed. It is the closest of all of the proposed allocations to the town centre and to the services and facilities within OSM with excellent pedestrian and cycle connectivity. It should be elevated from a Second Choice Allocation to a Preferred Allocation, increase the flexibility and deliverability of the Plan. There is no sound reason why this should remain as a Second Choice.



### **LP\_GH/ED/31 - Slade Farm - Rejected Site**

- Unacceptable location and traffic impact through Yonder St.
- This site has already been the subject of an unsuccessful planning application. It would not constitute sustainable development, being remote from the town centre facilities and unacceptable traffic impact.
- We need more good quality houses in Ottery.
- The dismissed appeal covered a much larger area, the western part is highly accessible and sustainable with good pedestrian/cycle access via Knightstone Lane, close to the town centre and facilities.
- A smaller scale scheme would sit well within the landscape and with the eastern higher field providing plenty of land for landscape planting and biodiversity net gain, etc,
- This site should also be a Preferred Allocation for circa 30 dwellings and would perform better than OTRY15, which has no pedestrian/cycle connectivity, so the justification either for the allocation of OTRY15 or for the rejection of GH/ED/31 must be wrong.

### **LP\_GH/ED/32 - Church Path Field, East of Chineway Gardens - Rejected Site**

- No comments

### **LP\_GH/ED/33- Land adjacent Greatwell Farm - Rejected Site**

- No comments

### **LP\_GH/ED/34- Land at Littlewell - Rejected Site**

- Wrong side of town regarding traffic.
- Water and sewage issues.
- This site doesn't make sense as an allocation

### **LP\_GH/ED/35 - Land at Ridgeway - Rejected Site**

- Poor access

- Generation of traffic along narrow lanes (Ridgeway & Higher Ridgeway) which are in part dirt tracks or too narrow and widening roads would involve compulsory purchase of gardens.
- Development would generate large volumes of traffic down Butts Road and through the town centre along North Street which lacks capacity.
- The existing Redrow/Butts Road estate is visually intrusive and is visible from the Ottery - Honiton road. Extra development would increase this.
- The Redrow/Butts Road extension required provision of stormwater detention facilities as water management is an issue and an expanded estate would overwhelm existing flood prevention measures.

### LP\_Otry\_01a - Barrack Farm - *Rejected Site*

- Devon County Council support rejection of this site as within Mineral Safeguarding Area.
- The site has good road links into and out of Ottery St. Mary, and should be considered as part of the solution to East Devon housing needs providing a decent corridor of development together with Ottery 09 and Otry 01b.
- Visual impact could be addressed through tree planting
- It is ordinary farmland with little or no ecology.
- The likelihood of coalescence between West Hill and Ottery is low considering the topography of the land and the established woodland.
- It is close to the secondary school and 1555m from the Medical centre.
- It has good road links and Ottery Town council has for years wanted a roundabout to temper the traffic speed this was proposed together with a school in a previous planning application on Ottery 09 which was supported by officers and wrongly refused.
- If we have to develop in East Devon the majority of our towns are in the valleys surrounded by rising ground often which is designated ANOB which often means any development extension of a established town is going to be seen , "it is inevitable " Design and landscaping must be used to mitigate such issues but to use this reasoning to force development away and onto less suitable areas must be questioned.
- This is in the Settlement Containment Zone identified for protection in the adopted Neighbourhood Plan. Development would constitute ribbon development and would lead to coalescence of Ottery and West Hill.
- The site is remote from the town centre facilities, which are already under significant pressure.
- GH/ED/26 and LP\_Otry\_01 should be split and considered on a field by field basis rather than discounted due to their size

### LP\_Otry\_01b - Barrack Farm (east) - Preferred Allocation

- Process isn't democratic
- Applications for housing should be determined as they are received not planned years into the future
- Lack of infrastructure
- Doesn't meet the 20 minute neighbourhood standard
- Strawberry Lane is already unsafe to walk along for the local children (they have to wait for buses here) and pedestrians due to narrow width and lack of pavements.
- Ottery has already had a great deal of development relative to its size.
- The traffic is awful around Exeter Road / Strawberry Lane at school start/end times.
- Cars already park all along the road beside the Kings playing fields, down to Salston Cross including in the passing places rendering them very unsafe and sometimes impassable for buses.
- West Hill Parish Council (and numerous others) note this site encroaches into the Settlement containment area in Neighbourhood Plan Policy NP4 so is unacceptable.
- There has been land allocated for employment development at the Finnimore Industrial for 25-30 years which remains undeveloped. No reason is given for additional land being required.
- No consideration has been given to the proximity of the farming activities at Barrack Farm where cattle are bred and fed in the large buildings, which generate noise, flies and smells from cattle waste and silage clamps.
- There is a combined sewer in Exeter Road/Barrack Road which flows into a storm tank and discharges into the River Otter at peak times. It should be replaced with separate foul and surface water sewers before any more development takes place to the west of Ottery.
- Ottery St. Mary is well placed to contribute to the housing need in East Devon, it has established services and has good access into the city of Exeter via a duel carriageway.
- If we are going to have houses and employment this land is probably the most suited because of its location on a main road , It has good links into town and is on the main bus route and not too far from Feniton train station.
- The issue raised by some about coalescence with West Hill is unfounded due to the distance and topography of the ground and established woodland between the sites.
- This site generally has a low impact regarding landscape sensitivity and any historic activity can be assessed by an archaeology survey.
- This site sits directly above the Kings Reach estate in Ottery with a low laying road directly beneath it which floods regularly. This surface water then runs down into Kings Reach causing issues for the residents who live there. This site is within the Settlement

Containment zone described in the Neighbourhood Plan. It should not be developed - it would only encroach on the separation between Ottery and West Hill.

- Site is remote from the town centre and facilities, which are unable to cope with additional development
- Local amenities and infrastructure for the town cannot cope with pressure from more houses in the town.
- Inadequate road access compounded by extensive parking on the lane which dangerously obstructs exit from the housing estate already present. Overflow parking from the nursing homes adds to the problem.
- There are no school spaces for the residents of new homes.
- This will urbanise the countryside setting of the town
- No need/demand for industrial. Detailed assessment is needed
- Recent agriculturally tied dwelling was approved based on farming this land- will this be revoked?
- Light pollution will damage the environment
- GH/ED/26 and LP\_Otry\_01 should be split and considered on a field by field basis rather than discounted due to their size
- The delivery of 1.25 hectares of employment land on this site (as with every other proposed mixed use development site) is unlikely to be delivered.
- Residential development is not appropriate given the existing use of this site.

### **LP\_Otry\_09 - Land at Thorne Farm - Preferred Allocation**

- Devon County Council, as landowner, supports allocation as it has good access to the A30 avoiding the need to take traffic through the town centre, there are good cycleway/footpaths to the town, which has good local facilities and the site is outside of the AONB
- Woodland Trust advise that trees on the Ancient Woodland/Ancient Trees inventory (ref ASNW at SY0824095422) are adjacent to the site. Please ensure that necessary protections are in place for these trees and ancient woodland sites, including suitable Root Protection Zones and buffer zones of at least 50metres between any development and the ancient woodland. Please ensure that no development will take place which will adversely impact irreplaceable habitats according to the NPPF.
- The Environment Agency advise that the site has an area of FZ3 and part designated main river along the northern boundary. If the site can pass the sequential test the area at risk should be set aside as GI, with a buffer of at least 8m from the watercourse, free from built development. As the site is adjacent to Cadhay Bog the policy should seek to secure BNG that can help expand the nature corridor.

- Devon County Council note this site is within a Mineral Consultation Area but consider it unlikely that the allocation will impact upon mineral resources in the area.
- West Hill Parish Council note a planning application was refused recently on this site, partly on landscape grounds, so it is difficult to see how this could be overcome.
- A large number of objectors stated that this site should be used for education purposes. It adjoins the school/should be used for a relocated Tipton St John School/King's should be expanded
- As far as sites go this one has merit.
- Doesn't meet the 20 minute neighbourhood standard
- DCCs need to raise funds doesn't justify this development
- Ottery has reasonable bus service.
- Good road links.
- Safety concerns around potential conflict between quarry and housing traffic
- Ottery needs housing to keep the town centre going i'm sure foot fall has decreased due to covid and internet shopping.
- Traffic issues, Ottery is better than other towns and cities.
- This site could provide a roundabout and pedestrian links to town.
- Visible from East Hill, but so's Dartmoor and good design and planning would mitigate any issues.
- These roads are typical for Devon, just drive appropriately.
- Houses have to go somewhere, make them as good as possible.
- There is going to be a new town in a totally wrong place because of the nimby brigade.
- Lack of infrastructure in the town
- Already flooding issues
- Lack of employment land.
- Ottery St Mary does NOT have good transport links with anywhere, buses are intermittent, not arriving on time or not at all, and journey times are between 50 and 60 minutes to travel 11 miles.
- The nearest train station is at Feniton 3 miles away where the trains between Exeter and London stop every 2 hours in either direction. To access Feniton station requires private transport from Ottery.
- There has been considerable housing development on the west of Ottery already, none of which has resulted in improved pedestrian and cycle links with the town centre. The pedestrian bridge over the Otter needs to be lit for pupils to access schools
- Paragraph 6.35 - This plan provides no policy proposals to ensure delivery of "all necessary infrastructure", or any infrastructure.
- Paragraph 6.37 is grossly misleading. This Draft Plan does nothing to address traffic in the town centre and the surrounding inadequate roads.

- Policy Otry\_09 does NOT safeguard the land reserved for expansion of The Kings School. The Policy proposes 90 dwellings, nothing else, which is contrary to Neighbourhood Plan Policy NP24. The Ottery St Mary Draft LP map does not show any land reserved for education purposes.
- The planning application made by Devon CC in 2020 for 150 dwellings and a primary school was refused. Funding a new primary school by Devon CC selling their land with planning permission for housing is of no relevance to allocating land for housing in a Local Plan.
- Because of its location up a steep hill and proximity to speeding traffic, the site is not suitable for a new primary school. Also, recently Devon CC have secured government funding to replace the Tipton St John primary school in Tipton St John.
- No consideration has been given to the resulting generation of additional traffic using Barrack Road and Cadhay Lane; the latter, which has no footways, is not suitable for additional vehicular traffic and is already a danger for pedestrians and cyclists.
- There should be no access to the proposed site to/from Cadhay Lane.
- The Plan is proposing at least 240 new homes to the west of Ottery without any consideration for providing adequate services and infrastructure. This is grossly negligent/the plan is unsound.
- The topography of the land to the north is unsuitable for development due to it being a steep sloping area. Concerned the runoff of rain will flood houses lower down.
- The land in question supports a variety of wildlife including protected species e.g. badgers, dormice
- Development of improved educational provision should not be dependent upon selling land off for housing development in order to fund capital investments in an enlarged school.
- A small amount of housing might be acceptable as long as a new school is delivered
- Local amenities and infrastructure are over capacity
- Quarry – with the quarry now agreed, there are severe concerns about how the quarry operations will cause water pollution. This proposed site is directly below the quarry site, so there could be a major safety concern.
- Next to a site of special scientific interest, namely the Cadhay bog. Even if houses were not built directly next to it, there will be human disturbance, litter etc which could affect this sensitive site, which has taken hundreds of years to form.
- This site is visually prominent
- One respondent submitted a very detailed response querying the need to retain the site for a new primary school and raising a number of technical concerns (particularly re flooding, highways and feasibility) which are beyond the scope of the local plan
- Increased noise and light pollution- detrimental to human rights Act and right to quiet enjoyment
- Will dominate properties in Cadhay Close

- Impact on Grade 1 listed Cadhay House
- Nearby quarry will be detrimental to new residents/pupils health

### **LP\_Otry\_10 - Land north and south of Salston Barton - Preferred Allocation (northern section only)**

- The Environment Agency advise that the site should not include the parcel of land to the south. The entire southern parcel is within FZ3 whilst the eastern edge of the northern parcel fringes FZ3. The site would need to be subject to SFRA2, and the sequential and exception tests before being allocated.
- Woodland Trust advise that trees on the Ancient Woodland/Ancient Trees inventory (ref Veteran Oak (ATI no: 170186)) are within the site. Please ensure that necessary protections are in place for these trees and ancient woodland sites, including suitable Root Protection Zones and buffer zones of at least 50metres between any development and the ancient woodland. Please ensure that no development will take place which will adversely impact irreplaceable habitats according to the NPPF.
- There is no sensible pedestrian access into town from this direction and poor vehicle access.
- No foot path link so strawberry lane will be dangerous to pedestrians
- Will increase flood risk, especially to Salston Lodge and low level bungalows at Salston Ride
- Properties at Salston Barton have the original wells in their basements and require pumps to remove excess water. This will be exacerbated by floodwater/run off
- Unacceptable impact on listed Salston Lodge
- Lack of infrastructure for existing residents- Dr's, dentists, school places etc.
- Heavy existing congestion in the area
- Contrary to neighbourhood plan policies
- Reasons for refusing previous planning applications still stand
- Precedent for small domestic development being refused as detrimental to countryside
- Development would increase the flooding risk for residents of Salston Barton
- Impact of continued construction noise for the residents of Salston Barton.
- Existing obligations, e.g. road maintenance have not been met by landowner. Further development will exacerbate these issues. Suggests future planning obligations won't be met.
- Existing residents will lose privacy and rural setting of their homes
- Significant loss in value of existing homes
- Strawberry Lane is already over capacity

- Development will have a large ecological impact on the natural environment. Plans contain errors, omissions, and inconsistencies.
- Existing empty homes within Devon should be reused
- Flood Risk- existing issue, extra run-off will make this worse. Requires a physical survey not just a desk top assessment
- Roads are single vehicle width and flood impassably.
- This is rural land that provides a beautiful natural habitat and green space amongst what is rapidly becoming a built up urban area.
- Will significantly impact views from across the valley.
- The objectivity of the Sustainability Appraisal is therefore compromised if its author has promoted an unpublished objective (to join OSM with the hamlet of Salston) rather than appraised the constraints.
- Construction noise for many more years above the 7 years construction for Kings Reach
- Mental health impacts including noise and fear of flooding
- Water quality impacts on the R. Otter
- Possible land stability for properties at Salston Barton
- Significant visual impact from East Hill AONB, whilst most of Salston is hidden in lower ground
- GH/ED/26 and LP\_Otry\_01 should be split and considered on a field by field basis rather than discounted due to their size
- Concern expressed re probity and inconsistency as other sites with the same or lesser constraints have been discounted
- Concern that bringing forward small parcels/sites avoids the need for EIA but the effects should be considered cumulatively
- Lovely safe green space with a sociable footpath for meeting neighbours and for dog walking, it has lovely wildflowers, old native mixed hedges and ancient and veteran oak trees. If its soil health (porosity and no compaction) is good, it is an essential water capture site to prevent run off into existing homes.
- Sewerage at Salston Barton – Houses 11 to 14 have soakaway system that requires the paddock adjacent to the drive (part of LP Otry 10).
- Houses 1 to 10 have a bacteria digester system. This is at maximum capacity and can be overwhelmed if there is too much runoff getting onto the system.

### **LP\_Otry\_15 - Land at Bylands, Slade Road - Preferred allocation**

- There is no pedestrian access to this site, which is on a narrow unlit country lane.
- Close to high-pressure gas transmission pipeline
- Site previously refused on appeal and those reasons still apply



### Omission sites at Ottery St Mary

- Site GH/ED/26 should be split and the northern/eastern section only be allocated

## Policy 23 - Seaton and its future development - General issues

- Seaton Town Council would like more affordable housing and no loss of employment land.
- The Environment Agency welcome the designation of a coastal change management area has been designated on the east side of the mouth of the Axe and the western side of town.
- Devon County Council note the town has most facilities so support the proposed small level of development – access to new and existing cycle routes should be provided from proposed sites.
- DCC feel that some of the rejected sites should be reconsidered as would be better for transport than a new community, allowing short-distance sustainable trips to local facilities.
- National Highways anticipate the strategic road network can accommodate the level of growth proposed at other Main Centres, Local Centres and Service Villages, but expect a high-level transport assessment for the entire Local Plan to provide evidence.
- The East Devon AONB team state that Seaton is set within stunning natural landscape that includes the Jurassic Coast World Heritage site, Seaton Wetlands and adjacent to the East Devon AONB. Any development as proposed by Policy 23 should have regard to these designations and be supported by an assessment such as an LVIA or landscape appraisal to assess how realistic the options for development are.
- The relative remoteness of Seaton compared to other Tier 2 settlements – distance from Exeter, lack of train station, poor bus service, poor road network, coastal location – makes it much less suitable for housing and employment development.
- As a large town, Seaton should have more houses, jobs and services built around it.
- Poor bus service timings make it virtually impossible for people working normal office hours to travel from Seaton to other areas.
- There are not enough jobs in Seaton for existing residents of working age so unless sufficient additional jobs can be created, there will be out-commuting.
- The seafront and town centre feel unloved and badly need some inward investment from housing and employment.
- Develop existing brownfield sites, such as the harbour and Tower areas, rather than the countryside.
- Seaton is unique in being bounded in two directions – the sea and the Wetlands – meaning its housing number should be reduced.
- The proposed 217 homes without any additional infrastructure such as new schools, doctor's surgeries and transport links is unacceptable and unsustainable for the town.
- Identify land for holiday accommodation, such as Seaton Heights.

- Developers that fail to complete existing permissions should not be allowed to apply for new permissions, Bovis have taken 10 years and counting to build 222 houses.
- Protect nature to support eco-tourism.
- Seaton is at risk of flooding, partly due to soil type which impedes drainage, so do not make decisions until the Water Cycle Study and DCCs surface water report are available – concerned that SuDS will not perform very well.
- Proposed development will be an enormous burden for sewage disposal, leading to more pollution of the River Axe and the beach.
- Need improved healthcare as Seaton hospital has no beds and is limited to physiotherapy and a few clinics; A&E is some distance away.
- Appreciate need for new houses but wonder whether there will be a fair number of affordable homes.
- Construction noise will adversely affect mental health of local residents.
- The Plan makes no reference to the woeful under provision of outdoor play space, with no additional provision for much needed new football pitches.
- Existing parking problems around the school will be made worse by more development.
- Seaton has seen under-investment, with a lagging town centre and insufficient infrastructure and facilities.
- Seaton needs more affordable housing, but it needs to be attractive and eco-friendly.
- Do not allow any building on the green wedge between Seaton and Colyford.

Nb. Devon County Council's consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.

### **LP\_Seat\_01 - Clay Common, Seaton - Rejected Site**

- Seaton Town Council support not allocating this site.
- Support the rejection of this site due to its elevated character meaning an adverse landscape impact from viewpoints such as the Coastal Path and AONB.
- Support rejecting this site due to wildlife impact, including within bat corridor.
- This site should not be developed as it will mean a loss of a firebreak between existing built development and forest beyond.

### **LP\_Seat\_02 - Land at Barnards Hill Lane, Seaton - Preferred Allocation**

- Seaton Town Council do not object to allocating this site but need improvements to Barnards Hill Lane and drainage.
- Seaton Town Council note there is an opportunity to make this part of Barnards Hill Lane two way traffic or block the access to the A3052 and make other access arrangements.
- The landowner supports the allocation and reconfirms the land is available for development.
- If bungalows are built on this site, it will only attract retired people which will put pressure on already overstretched services.
- Consider restricting the type of homes to bungalows to fit in with the adjacent estate.
- Barnards Hill Lane regularly floods, and there is a risk of flooding of properties to the east of this site due to topography and limited capacity of Mercia mudstone to allow infiltration.
- Object as developing the site will cause overlooking of existing houses to the east.
- There are several Oak trees on the boundary which are home to owls and bats.
- This site is productive agricultural land which will be lost forever.
- Concerned about traffic impact on surrounding estate roads such as Poplar Tree Drive.
- Unaware of good opportunities for employment in this area.
- Object as within bat pinch point.
- Object as there is significant Roman and prehistoric interest.
- Object as part of the historic Green Wedge.

### **LP\_Seat\_03 - Land to the south of Harepath Hill, Colyford - *Potential 'Second Best' Allocation***

- Seaton Town Council want to see Seat\_03 and Seat\_05 developed together – Seat\_03 should be a preferred allocation which provides badly needed sports pitches.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Developer (Baker Estates) support this allocation for around 70 dwellings and recreational use.

- Local people have been objecting to this site for years, and the issues remain: vulnerable to flooding, pollution of River Axe, sewage outflow, ribbon development, impact on Wetlands, too far from the town.
- Planning Inspector dismissed this site due to high landscape sensitivity and adverse ecological impact on bats.
- Object as would mean loss of best and most versatile agricultural land.
- Adverse impacts on bats as located in pinch point.
- Developing the site will lead to light pollution, adversely affecting wildlife.
- Object as within Green Wedge and will join Seaton with Colyford.
- Unaware of good opportunities for employment in this area.
- Object due to increase in traffic on to either Harepath Road or the A3052.

### **LP\_Seat\_04 - Land off Harepath Road at end of Fosseyway Park, Seaton - *Planning Permission Granted***

- Seaton Town Council agree this site should be used for the seven industrial units granted planning permission in May 2014.

### **LP\_Seat\_05 - Land off Harepath Road, Seaton - *Preferred Allocation***

- Seaton Town Council consider this site and Seat\_03 together and do not object to allocating both sites, providing they are developed together and provide more than just housing.
- Seaton Town Council state a footpath should be required from Colyford Road to Gravel Lane where a crossing should be installed.
- Historic England state it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it is likely to be able to accord with national policy, guidance and legislation.
- Developer (Baker Estates) support this allocation but should be amended to about 130 dwellings reflecting the submitted planning application.
- Planning Inspector dismissed this site in 2015 on grounds of high landscape value and ecological impact on bat pinch points.
- There must be footpath access from the development to the Wetlands, then south on the proposed cycle route into Seaton before construction starts.
- Object as within Green Wedge, contrary to current Local Plan.
- Object due to adverse impact on the village character of Colyford, upheld by a Planning Inspector on appeal.
- Mercia mudstone impedes drainage and infiltration from SUDS.

- Local people have been objecting to this site for years, and the issues remain: vulnerable to flooding, ribbon development, too far from the town.
- Building on this site will cause irreversible damage to Seaton Wetlands to wildlife, including cat predation, and as a recreation space for people.
- Road along eastern boundary is very narrow, winding and has no footpath so there should not be any access to this site.
- Object as would mean loss of land for food production, classed as best and most versatile agricultural land.
- Run-off from this site is likely to be into the Stafford Brook which feeds into the River Axe, increasing phosphate levels contrary to Natural England advice.
- Developing the site will lead to light pollution, adversely affecting wildlife.
- Adverse impacts on bats as located in pinch point.
- Unaware of good opportunities for employment in this area.
- National Cycle Route so avoid increased traffic along Colyford Road.

### **LP\_Seat\_06 - Former depot, Colyford Road, Seaton - *Planning Permission Granted***

- Seaton Town Council state that as no work has begun on the business units approved in July 2014, perhaps housing should be located here given its accessible location, and the business units moved to Seat\_03.
- Concern that sewers and surface water drains could not cope with this development.

### **LP\_Seat\_07 - Land at Colyford Road, Seaton - *Rejected Site***

- Seaton Town Council agree this site should be rejected as there is insufficient evidence that flooding and ecological issues can be mitigated.
- Support rejecting this site as it is too close to Seaton Wetlands.
- The owner of this site is trying to put a holiday park on this site – it should remain as agricultural land.

### **LP\_Seat\_08 - Land between Churston Rise and Couchill Copse, Seaton - *Rejected Site***

- Seaton Town Council agree this site should not be allocated due to adverse landscape impact and impact upon bats.

- Support the rejection of this site as it is highly exposed and sensitively located on the skyline, with views from the AONB and the seafront.
- Support rejecting this site as it is a well-known wildlife site, home to adders, mice, foxes, badgers, bats and birds.
- This site is well used for informal recreation, used for nearly 60 years, so should not be developed.
- Development on this site would place further strain on the drainage system, repaired numerous times in recent years due to collapsed pipework.
- This site should not be developed as it will mean a loss of a firebreak between existing built development and forest beyond.
- Developing this site could cause instability for existing houses to the east due to the steep slope, so support its rejection.

### **LP\_Seat\_09 - Land at Clay Common (Little Paddock), Seaton - Preferred Allocation**

- Seaton Town Council do not object to this site for a small amount of housing not exceeding seven homes.
- Cramming seven houses onto this land would destroy the character of the immediate locality which is larger detached homes.
- Object as located too far out of town.
- Object as would result in loss of the only agricultural land in Seaton.
- Object as this site is home to wildlife, including bats.
- Access on to Beer Road is dangerous, particularly turning right.
- Development of this site will lead to further development of the large adjacent field.

### **LP\_Seat\_10 - Land south of Beer Road, Seaton - Rejected Site**

- Seaton Town Council agree this site should be rejected due to adverse landscape impact.
- Support the rejection of this site due to being on a steep slope in a sensitive location meaning adverse landscape impact.
- Support rejecting this site as it is within the corridor used by bats from the Beer Quarry Caves.

### **LP\_Seat\_11 - Land at Barnards Hill Lane, Seaton - *Rejected Site***

- Seaton Town Council agree with the rejecting this site as it is not within, adjacent, or otherwise well related to Seaton.

### **LP\_Seat\_14 - Seaton Town Hall Long Stay Car Park - *Rejected Site***

- Seaton Town Council agree with rejecting this site as it is too small to allocate.

### **Omission sites at Seaton**

- A local resident states the Riverside Workshop site is earmarked for development.
- A local resident suggests a further site at Marshlands, Harbour Road which Seaton Town Council has considered redeveloping.
- A local resident states Bradford and Harcombe Engineering land on Harbour Road would be suitable if they became available.



## Policy 24 - Sidmouth and its future development - General issues

- Recognition that the NPPF is (was) prescriptive on how local housing needs are to be established and that local plans must allocate sufficient land to meet those needs. However, it is important to note that the Standard Method for assessing local housing need is based on ONS projections of households and includes trend migration. So “local need” is in fact not local need as most residents would accept the term (ie the excess of newly forming households in the neighbourhood plus local suppressed demand); in fact East Devon's natural population growth is negative. The projections were based on a period when East Devon was subject to large in-migration from Exeter to Cranbrook, and there is a danger that this trend becomes self-perpetuating by being built into successive plan targets.
- The Environment Agency note that a coastal change management area including a significant number of residential properties is proposed to be designated and recommend the policy (in conjunction with Policy 37) considers allocating land precisely for the purpose of relocating the properties east of Sidmouth within the CCMA.
- Devon County Council (DCC) state the secondary school would require expansion to support the proposals.
- DCC support small levels of development – rejected sites are outside standard cycling distances to town centre so would require a good bus service, which would still be preferable to a new community.
- DCC state there are a number of surface water flowpaths, ordinary watercourses and flood zone areas impacting upon sites to the north of Sidmouth/Sidford - opportunities to enhance existing watercourses and daylight any culverted sections should be sought.
- Sidmouth TC - The additional burden on local services and the erosion of the AONB on which our tourism industry depends are the principal reasons why Sidmouth Town Council do not support the allocation of housing on Sidm\_01, Sidm\_06, Sidm\_17 and Sidm\_34. Sidm\_06 and Sidm\_34 also contravene the Sid Valley Neighbourhood Plan by promoting the coalescence of Sidford and Sidbury and the latter site also has highway difficulties.
- General comments resisting the development of green field and suggesting more emphasis is placed on brown field sites to help protect the planet and meet climate commitments.
- Comments suggesting that Sidmouth should have more residential allocations due to the presence of vibrant town centre / to balance with allocations at Exmouth and tier 2 settlements.
- SCOC - A far greater emphasis needs to be placed upon the provision of basic infrastructure: roads, health provision, schools, sporting and recreational facilities, utilities, public transport and community services. These are the essential requirements of modern life, not luxuries, yet they are barely mentioned. It is unacceptable to even

contemplate the kind of population growth being proposed without addressing these concerns.

- Sid Vale Association -

- Development should just be to suit the local needs of Sidmouth and the Sid Valley as opposed to a more extensive 'wider surrounding area'.

- Accordingly we strongly disagree with para. 6.54 of the Draft Local Plan that Sidmouth is a suitable place for a 'large amount of development' .. albeit subject to the constraints of the AONB. Rather we would prefer redevelopment of brownfield sites/ repurposing older larger houses into flats and conversion of older commercial properties and office buildings within the Sid Valley as a more sustainable methods of increasing the housing supply.

- Sid Valley Biodiversity Group -

- The SVNP is possibly one of the few Neighbourhood Plans which promotes the creation of a Biodiversity Action Plan – which has already been carried out in collaboration with Sidmouth Town Council – and yet there is no mention in the “Key messages from the Neighbourhood Plan for the area” of the Sid Valley. The SVBG would therefore request that the draft Local Plan includes reference to the Biodiversity Action Plan as promoted by the SVNP.

- Also disappointing is that, under the “Key messages from the Neighbourhood Plan for the area” of the Sid Valley, there is no mention of any the SVNP's 'green' policies, despite the general 'green' approach in the draft Local Plan. On the other hand, there are several mentions of 'green corridor' in relation to other settlements, including Exmouth, Uplyme and Westclyst – and yet not for the Sid Valley, where the SVNP contains a specific Policy (number 4) as well as references to specific green corridors, including the Byes park along the blue corridor of the River Sid. The SVBG would therefore request that the draft Local Plan includes reference to the 'green corridors' of the Sid Valley, as referenced in the SVNP.

- Greenway Lane residents -

- We strongly believe that the small area of woodland to the extreme north of site Sidm\_01, which borders Woolbrook Road and Greenway Lane, should be excluded from this allocation for development on the grounds of its positive contribution to the landscape character of the surrounding area, including the East Devon A.O.N.B, and because of its ecological value as a habitat for local wildlife.

- We strongly believe that the proposed new line of the 'Settlement Boundary' for Sidmouth should follow the line of Greenway Lane (indicated in red on the Local Plan Map extract), and exclude the small cluster of dwellings to the north of Greenway Lane.

- Due to the size of this potential development, and its strategic position at the gateway to Sidmouth, we strongly believe that the Council should take the lead in setting an agenda of 'design excellence' for this site. The aspiration should be for an award winning development that contributes positively to the character of the town and is not just an opportunity to meet the housing

- As we are stuck with the partially developed site at Sidford, why can't the council compulsorily purchase it at a fair price and change its use to affordable housing and houses suitable for elderly people? Which is what you say we need.
- Suggestions that low levels of proposed development in Sidmouth is politically motivated and/or due to the number of councillors and authority officers that live in Sidmouth.
- Suggestion that Sidmouth should have more services and jobs to support the scale of the town.
- Sidmouth should be recognised as having extremely limited development potential because of its location in the AONB.
- Housing mix should address the local population imbalance, with Sidmouth suggested as currently attracting high numbers of wealthy retirees with a population in balance and a high proportion of second homes.
- Request to revisit allocations and policy approach in light of government housing targets no longer being mandatory, but rather left to local decision makers.
- There is little reference or cross-linkage to other policies, including the climate emergency and biodiversity.
- The policy addresses possible need for additional development for 168 new homes and 3.11 Ha (7.68 acres) of employment. The evidence base for housing is provided but with no correspondingly detailed analysis of future employment trends and location of work.
- The VGS urge the District Council to clarify exactly as to how the new housing allocations will contribute to providing housing for the low paid who actually work in the Sid Valley. The VGS suggests that the plan fails to identify the high proportion of in commuting to serve the economic activity of the town.
- Need to protect the coastline from development.
- Turley for Bloor Homes – Supportive of Sidmouth as a tier 2 settlement. Suggest that a lack of suitable development opportunities calls for more land for development to be released (within the AONB). Challenge the logic for excluding sites LP\_Sidm\_02 and LP\_Sidm\_35 from the proposed allocations within the LP. Turley provide a Vision Document and call for a rethink on these sites.
- Policies on coastal erosion imply that little control would be placed on new developments. The policy needs to be developed so this is not seen as a route to easy planning consent in rural settlements within Sidmouth - much of which is in the AONB.
- Concern raised over pressure on housing market from second homes and holiday lets.
- Need evidence to show there is a demand for 2.4 hectares of employment land in Sidmouth and Sidbury, otherwise it could be used for residential by default – the Sid Vale Association do not consider there is demand for more employment land.
- Support Sidmouth settlement boundary proposed
- The East Devon AONB team state that 2 of the three sites for development are within the AONB but fall within the proposed new settlement boundary. Any of these

designations should be accompanied by an assessment, either as an LVIA or landscape appraisal to ensure that they do not impact on these important natural heritage sites.

- National Highways anticipate the strategic road network can accommodate the level of growth proposed at other Main Centres, Local Centres and Service Villages, but expect a high-level transport assessment for the entire Local Plan to provide evidence.
- Plan reference to 'The Lookout' is incorrect, orientation of the field is west of the lookout, not east. This field lies within the AOB and is visually significant and tranquil as well as housing rare wildlife species.

Nb. Devon County Council's consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.

### **LP\_Sidm\_01 - Land south-west of Woolbrook Road, Sidmouth - Preferred Allocation**

- DCC note there have been longstanding issues with ordinary watercourse and surface water flooding in the Woolbrook catchment, primarily of the highway – the site is an opportunity to lower flood risk to the catchment.
- The distance to any facilities and infrastructure of the proposed Sidm\_01 allocation throws into doubt the viability of the 15/20-Minute Neighbourhood.
- Sidmouth Town Council does not support the allocation of employment land within the AONB at Sidm\_01.
- Sidmouth Town Council would like to see land at Sidm\_01 allocated in the Local Plan for a Park and Change facility.
- Sidmouth Cycling Campaign state the potential site for allocation south west of Woolbrook Road (Sidm\_01) lies adjacent to the former railway line that has been identified as a future cycle route from Sidmouth to Feniton (included in Policy 66). We recommend that the boundary of this site be extended to include the former railway line. This will enable a condition to be put on any future planning permission for the former railway line to be adopted as Public Open Space and create a footway/cycleway to the south to link up with the existing public footpath to Ice House Lane. This would support Strategic Policy 65 and Policy 66.
- Woolbrook Road site (Sidm\_01) housing numbers suggested as too high.
- Sid Vale Association -
  - There is no justification for 0.51 Hectares of Employment Land – as access is poor, there is no demand for more Employment Land and its incompatible to have Employment Land (i.e. B2 industrial uses) next to a new residential area).

- Residential development should only be allowed if it provides Affordable Housing (rented/ shared ownership etc.) and housing is reserved for a proportion of 'Key Workers'.
- Additionally, this proposal is contrary to this Draft Local Plan's Policy 75 as the site is within the AONB and it will not enhance the AONB. Rather this proposal will be detrimental to the AONB.
- With the anticipated change in Government's NPPF policy to just providing 'Advisory' – not mandatory housing targets this site should be removed from the Local Plan as a proposed housing site.
- SVBG - If the development were to progress, the SVBG would like to highlight that part of the site is within the flood zone and that any development should be significantly above the current and any likely future flood zones, taking into account the impact of climate change. The SVBG would welcome the retention and expansion of the hedgerow to create a wider wooded buffer along the boundary with the road, which would help to reduce flood risk whilst also providing a wildlife corridor. [See the suggested riparian woodland footprint from EA's "working with natural processes" map.]
- The SVBG would urge that any development on the site includes natural systems for flooding mitigation, including measures such as rain gardens and a robust SUDS scheme.
- Call for priority habitat to be retained and extended to the south and west. It is worth noting that this tiny woodland may be the last remnant of a larger ancient woodland, now lost, as evidenced by field names in the 1830 tithe map.
- The SVBG would urge that the boundary with the old railway line is protected and extended since it is currently a rich wildlife corridor, partly due to the many mature, dead and dying trees, including ash; these will be important for bats and invertebrates and should be retained wherever possible. The line should not be opened up for recreation, since this would inevitably lead to the removal of this important stock of veteran trees and standing dead wood. If recreational routes are needed, then agreeing access to the fields above the railway line (to the north west) would be a better choice.
- This site lies adjacent to the former railway line that has been identified as a future cycle route from Sidmouth to Feniton (included in Policy 66). We recommend that the boundary of this site be extended to include the former railway line. This will enable a condition to be put on any future planning permission for the former railway line to be adopted as Public Open Space and create a footway/cycleway to the south to link up with the existing public footpath to Ice House Lane. This would support Strategic Policy 65 and Policy 66.
- Heritage is flagged as an important aspect of this site with archaeological finds in the past.
- Persimmon Homes -
- The Company fully supports the inclusion of this proposed allocation within the Regulation 18 version of the Local Plan: it provides a logical rounding off to the settlement edge, is

deliverable and provides an opportunity to meet the housing needs of Sidmouth and East Devon.

- In our view, the Site would not provide a logical location for employment as there are sustainable and logical existing alternatives within the settlement. Furthermore, paragraph 6.53 of the Local Plan acknowledges the proposed strategy, in the context of the made Sid Valley Neighbourhood Plan, the clear emphasis on retaining existing employment sites and supporting the town centre. Arguably, this is contrary to Sidm\_01, as worded. A blanket employment policy should not be utilised, and further consideration should be made on a localised basis, to meet settlement needs.

### **LP\_Sidm\_02 - Land at Sidford High Street - *Rejected Site***

- Development with AONB should not be considered.

### **LP\_Sidm\_03 - The Knowle, Sidmouth - *Planning Permission Granted***

- Very sad. Despite the strength of local opposition towards development of this site, including a March by thousands of local residents, from the seafront up to the council offices, the planners simply ignored local opinion and went ahead.
- This was an opportunity to provide more mixed use/ mixed community housing in the heart of Sidmouth not more retirement properties which we have a surfeit of already and which I believe the developers are struggling to sell as it is.
- We need more affordable housing in Sidmouth. Not all can afford the available properties.

### **LP\_Sidm\_04 - Land to the east of The Lookout, Coreway, Sidford - *Rejected Site***

- Development with AONB should not be considered.

### **LP\_Sidm\_05 - Land east of Burscombe Lane, Sidmouth - *Rejected Site***

- Please protect all areas outside settlement boundaries that are AONB SSSI etc.
- Not suitable for development.

## LP\_Sidm\_06a - Land west of Two Bridges Road, Sidford - Preferred Allocation

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to the setting of Sidbury Castle and LB's
- SVA -
  - We strongly object to the development of this site as it constitutes infilling of the 'Green Wedge' between and separating Sidford and Sidbury. We do not support this policy as it is outside the 'settlement boundary' of Sidmouth/ Sidford and the Council's own policy discourages such development (ie Draft Local Plan Policy No 7 dictates that there should be no development outside the 'Settlement Boundary').
  - The Local Plan itself notes that this site could cause 'settlement coalescence' & encroach into the Green Wedge between Sidford and Sidbury again contrary to the Council's own policies (refer Draft Local Plan Policy 78 – see below and Policy 3 of the adopted 'Neighbourhood Plan for the Sid Valley 2018 - 2032 seeking to avoid 'Settlement Coalescence').
  - Additionally, this proposal is contrary to this Draft Local Plan's Policy 75 as the site is within the AONB and it will not enhance the AONB. Rather this proposal will be detrimental to the AONB.
- Agent for Land Value Alliance - We support the identification of the Land West of Two Bridges Road (SIDM\_06A) as a preferred site for approximately 30 homes.
- The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is protected within the Sid Valley Neighbourhood Plan. The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas. This site cannot be considered in isolation to the existing permitted development at site Sidm\_09 and the cumulative negative impact that this additional site would have upon the local community, the road network and the local vista.
- This site clearly contravenes the policy in the Neighbourhood Plan for a green wedge between Sidford and Sidbury. It is in the AONB and any development of the site is inappropriate.
- Further development in this area following that recently granted permission at national level must take into account the impact on a road that is only a status because it connects the towns of Sidmouth and Honiton. It does not have the capacity nor structure

to handle increased traffic flow and heavier vehicles which would be a consequence of such development.

### **LP\_Sidm\_06b - Land west of Two Bridges Road, Sidford - *Rejected Site***

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to the setting of Sidbury Castle and LB's
- Agent for Land Value Alliance – We consider that there is potential for a higher number of homes to be accommodated at Sidford [taking LP\_Sidm\_06a into account] and therefore that the Draft Plan should explore the potential for SIDM\_06A to accommodate a quantum of development higher than 30 dwellings 'and that SIDM\_06B could logically accommodate some of this increase.
- The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is protected within the Sid Valley Neighbourhood Plan. The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas.
- This location would not be appropriate for permitted development that a site of this size could deliver. This site cannot be considered in isolation to the existing permitted development at site Sidm\_09 and the cumulative negative impact that this additional site would have upon the local community, the road network and the local vista.

### **LP\_Sidm\_08 (a/k/a Sidm\_27) - Land east of Two Bridges Road, Sidford - *Planning Permission Granted***

- This site is where the business park has already been granted planning permission. Since the draft Local Plan was published the site's owners have put the site up for sale and in doing so, they have raised the possibility of this site obtaining change of use from employment land to either residential or a mixed use of employment and residential.
- I have never been convinced that this site was suitable for use as employment land but that argument was lost in 2019 when a Planning Inspector determined it was suitable. As this is no longer agricultural land is a brown field site, I am in principle supportive of its future use being subject to change of use to either residential or a mixed use of



employment and residential. I hope that whoever owns this land going forward will approach the District Council for such a change of use.

- On behalf of OG Holdings Retirement Benefit Scheme -
  - In assessing the Sidford Site as part of the HELAA assessment, the LPA's Policy Team are asked to take account of the extant permission and the technical data available to them, including the Environmental Impact Assessment, which is already available to the LPA as part of the extant consent. This information confirms that the development area of the site can be delivered to achieve Flood Zone 1 and would in this respect be 'achievable' for housing.
  - If it is that the LPA cannot accept a degree of housing on the Sidford site (Sidm\_27), then the proposed investment in the Alexandria Industrial Estate would be unachievable. In order to deliver employment investment at Sidford, without a capital receipt from Alexandria Industrial Estate (which was previously envisaged), the Sidford site may need to be intensified for employment.
  - The Policy Team are requested to review this representation and application 22/2063/MOUT, which details why the rewording of the policy associated with the two allocations is desirable if employment need is to be facilitated by viable levels of investment. Equally a shift in the nature of the allocations can relieve/improve the capacity to find suitable, available and achievable land for approximately 50 houses.
- The land is within the AONB and should be safeguarded from development.

### **LP\_Sidm\_09 - Land east of Two Bridges Road incorporating Sidm\_08, Sidford - Rejected Site**

- The Town Council does not support the allocation of employment land within the AONB at Sidm\_09.
- Not supported - The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is protected within the Sid Valley Neighbourhood Plan. The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas.
- Development here would increase traffic through the narrow A375 into the cross roads at Sidford. This already has problems with long tailbacks.
- Run-off would increase the River Sid water levels and increase flooding for Sidford and Sidmouth properties.
- Further development in this area following that recently granted permission at national level must take into account the impact on a road that is only a status because it connects the towns of Sidmouth and Honiton. It does not have the capacity nor structure

to handle increased traffic flow and heavier vehicles which would be a consequence of such development.

### **LP\_Sidm\_12 – The Hams, Fortescue Road, Sidford - *Rejected Site***

- Not supported - This agricultural site of just under 5 hectares has been submitted for the residential development of around 50 homes. This site slopes from Fortescue Road towards the River Sid in the vicinity of the Byes which I believe is a restricted development area and the AONB forms part of this site's boundary. Part of the site at least is within Flood Zone 3. The site is located at the edge of Sidmouth and would encroach upon the boundary of Sidford.

### **LP\_Sidm\_13 - Land adjoining Fortescue Road, Sidmouth - *Rejected Site***

- Not supported - This agricultural site has been submitted for the development of just over 30 houses. The site is located at the edge of Sidmouth and would encroach upon the boundary of Sidford.
- Landowner - I would respectfully point out that the full extent of the submission should have been properly displayed so that the public are made aware of the additional areas of land, totalling 25 acres, that will be handed over to community use. This area includes 15 acres either side of the River Sid. The proposal also includes the provision of new cycleways and footpaths to create a circular walk beside the river, connecting with Footpath No.157., and via a new bridge linking to the footpath and cycleway in The Byes. The proposal also includes a new allotment, and a programme of large scale tree planting and habitat creation. The scheme also includes a new lake to encourage migratory birds and wildlife generally.

### **LP\_Sidm\_14 - Land adjacent to Stevens Close, Sidford - *Rejected Site***

- Not supported - This site is within the AONB and any development on this site would be highly visible.

### **LP\_Sidm\_16 - Sidmouth Garden Centre, Stowford - *Rejected Site***

- Support for rejection.

## LP\_Sidm\_17 - Peak Coach House (Numbers 1-3 Belfry Cottages), Cotmaton Road, Sidmouth - Preferred Allocation

- The Environment Agency note that while the site is outside the proposed coastal change management area, parts of Peak Hill Road to the south may be vulnerable to coastal erosion. The plan should consider whether the alternative access of Cotmaton Road is appropriate to serve the level of development proposed.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- This site should not be included in the Local Plan allocation because road access is too narrow. Residents have already complained about the difficulty passing other vehicles at this (southern) end of Cotmaton Road. The turn out onto Peak Hill Road is very dangerous because its not possible to see vehicles entering from Peak Hill. I would have expected DCC Highways to object to the inclusion of this site as complaints have already been made to Cllr Hughes.
- The number of additional houses from this site is insignificant, given that existing dwellings would be demolished. The properties are certain to be at the upper end of the market in Sidmouth because of the location and of no real benefit to most residents of East Devon.
- This site is in the East Devon AONB and visible from lower down the valley and from Connaught Gardens. The area is characterised by many trees and shrubs whose loss would be damaging for the environment and biodiversity. No further development should be permitted in this area of the town.
- SVA -
  - This proposal represents an overdevelopment of this existing sensitive site which currently only has 5 dwellings, has very limited vehicular access from Cotmaton Road and falls within the original curtilage of the adjacent 'Peak House', (Grade II Listed).
  - The existing Peak Coach House buildings include a very attractive clock tower with weather vane, old Walls etc. which should be retained.
  - This site is very prominently situated with commanding 'key' views down the Sid Valley looking east and equally is clearly visible from Sidmouth below and the hills above. Development of this site would cause a blot on the landscape clearly visible looking across the Valley. NB Retention of 'Key' views is Policy No 2 of the Sid Valley Neighbourhood Plan so development of this site would adversely affect views across the Sid Valley.
- In broad terms it is difficult to see how the plot of land can support 11 3-4 bedroom dwellings.
- Suggested as overdevelopment of the site.

- Concerns over highways capacity, impact of development with significant vehicle movements.
- Request for a covenant preventing holiday lets / second home ownership.

### **LP\_Sidm\_18 - Land north of Sidmouth Garden Centre, Stowford - *Rejected Site***

- No comments

### **LP\_Sidm\_19 - Land at Dark Lane, Sidmouth - *Rejected Site***

- Avalon for Mr and Mrs Mayor (Land owners) - Suggest that the site assessment work is incorrect in rejecting this site for allocation. In light of the identified development constraints, it is now proposed that the number of houses for the site could be limited to 11 houses (a 57.7% reduction). An indicative concept plan has been provided to show at a high level how the site could come forward to provide this reduced level of development and achieve the approach to development set out in this letter. The layout shows a mix of detached (5 units – coloured blue) and semi-detached (6 units – coloured orange) alongside retained and additional trees and hedge planting along the Dark Lane boundary and a widened access road along Ice House Lane.
- This piece of ground is high and any houses would be very much overlooking surrounding properties.
- Road access is single lane Devon bank, only suitable for very occasional traffic. Dark lane is a beautiful old Devon lane with banks and overhanging trees that would have to be completely removed or upgraded.
- A lot of wildlife use or live on the land, including fox, badger, rabbits, tawney owls and slow worms.

### **LP\_Sidm\_20 - Station Yard, Station Road, Sidmouth - *Rejected Site***

- No comments

### **LP\_Sidm\_22 - Alexandria Industrial Estate, Alexandria Road, Sidmouth - *Rejected Site***

- This is Land should only be for Industrial Usage as it is at the Moment. It should NOT be allowed to change to expensive residential usage.

### **LP\_Sidm\_24 - Land east of Two Bridges Road and north of Sidm\_08, Sidford (the central portion of Sidm\_09) - Proposed Employment Allocation**

- Sid Vale Association - 1.6 Hectares - proposed as an Employment Site.

This proposal is strongly objected to as -

- (i) It will infill the Green Wedge between Sidford and Sidbury (contrary to the Council's Policy 78 in the Draft Local Plan - see below and Policy 3 of the adopted 'Neighbourhood Plan for the Sid Valley 2018- 2032 seeking to avoid 'Settlement Coalescence').
  - (ii) There is no need for more Employment Land as the Alexandria Industrial Estate, Sidmouth, is now subject to a planning application for new Business Units. Additionally the adjacent proposed 'Sidford Business Park' on the north east side of Sidford is 'For Sale' as the owners advise there is no 'demand for Employment Land'.
  - (iii) Additionally, this proposal is contrary to this Draft Local Plan's Policy 75 as the site is within the AONB and it will not enhance the AONB. Rather development of this site will be detrimental to the AONB.
- Call for the site (currently allocated for employment) to be unallocated and allowed to revert to agriculture.
  - This site has previously been identified as a potential extension of the business park site next door; however, this site is not being pursued by the owners of the business park.
  - The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is protected within the Sid Valley Neighbourhood Plan.
  - The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas.

### **LP\_Sidm\_28 - Church Street Car Park, Sidford - Rejected Site**

- No comments

### **LP\_Sidm\_30 - Land at Redwood Road, Sidmouth - Rejected Site**

- I support recommendation to reject this site. It is a sloping site which acts as an ecological buffer to the woodland of Salcolme Hill, coastal protection zone and AONB. The field is a hunting ground for a variety of mammals including fallow deer, badgers, foxes and bats. Any development would have a highly detrimental impact on both the ecology of the slopes of Salcolme Hill and a high visual impact on sightlines across the valley as its elevation is visible from many points in the valley and in particular from the west. The field and other adjacent fields should have protected designation to prevent any future attempts at development.
- Area of outstanding natural beauty and coastal preservation zones should be prohibited from developments.

### **LP\_Sidm\_31 - Land north of Cornfields, Sidford - Rejected Site**

- The conclusions to disregard this site on landscape grounds are somewhat surprising, given the proximity of the adjacent housing development which lies to the east and south of the site. The East Devon AONB boundary has been tightly drawn around Sidford, and as such most new housing development to support the housing requirements for Sidford and the wider hinterland of Sidmouth is going to extend into the AONB. There is not an in-principle objection or bar on development in AONBs and this reflected in the application approval for the sited referenced LP\_Sidm\_08, which lies to the west of the site (LP\_Sidm\_31) being supported under this representation. In allowing the appeal for the site referenced LP\_Sidm\_08, the Inspector only had to substantively deal with highway matters. The impact on the AONB, was confined to other matters and the development which was extensive was not considered to have an adverse impact on the AONB. The site was allocated and therefore the development was acceptable in terms of the impact on the AONB.
- When considering the extent of the impact of the LP\_Sidm\_31, as previously stated the site is well related to the existing settlement with housing to the south and east. The development of this site would clearly be seen in the context this development. Thus, the impact on the on the AONB is considered to be limited. Additionally, the northern boundary of the site has mature tree coverage which will screen the development and integrate the site into the landscape with little or no impact on the AONB. Furthermore, it will have been noted that the site slopes down from the north to the south, thus reducing any potential impact on the character of the AONB. Therefore, it is considered that the reasons for not allocating the site are essentially unfounded and the Council are requested to reconsider their position and to allocate the site.

- It is considered that other matters such as access, drainage and ecology matters are acceptable and should not be a bar to the allocation of the site.
- Please protect existing AONB and SSSI sites outside settlement boundaries

### **LP\_Sidm\_35 - Land north of Sidford High Street - *Rejected Site***

- Development within AONB should not be considered. It would be unacceptable on this site.

### **Omission sites at Sidmouth**

- None identified.