

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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Chapters 1 to 5

Pages 32-118

July 2023

Chapter 1 - Introduction, evidence and policies

Chapters 1 plan formed an introduction and set out a vision and objectives for the plan. Key matters raised included.

EVIDENCE

- The Environment Agency note that the evidence base does not include the habitats and biodiversity referenced – this could include national and local evidence including emerging nature recovery mapping and local nature recovery strategy for Devon, the River Axe SSSI River Restoration Plan and the report to Defra ‘Making Space for Nature’.
- Natural England advise of additional documentation which could be added to the evidence base for the Local Plan include the Beer Quarry and Caves SAC Guidance, the Shoreline Management Plan, the Management Plans for East Devon and the Blackdowns AONBs and the South West River basin management plans: updated 2022 - GOV.UK (www.gov.uk)
- Exeter Cycling Campaign would like the evidence base to include the government’s ‘Gear Change’ strategy 1. Nor is there mention of extant design standards for cycling infrastructure (LTN 1/20) or the ‘Manual for Streets’ design guidance. These are standards that should be mandated as part of the Local Plan. Furthermore, the Devon Climate Emergency Response Group’s Carbon Plan is not cited as evidence underpinning the Local Plan. This is a surprising omission. These standards and strategies should play a greater role in shaping the East Devon Local Plan so that the vision of tackling climate change and promoting sustainable transport are deliverable

FIGURE 1 - KEY FACTS

- The Environment Agency suggest that ‘Figure 1’ is expanded to include coastal erosion with flooding and reworded to explain that flooding and erosion are worsening and that this is predicted to continue.
- South West Water agrees that climate change and flooding are highlighted in ‘Key Facts’.
- Some developers want the plan to include more information in Figure 1 such as:
 - Population growth forecasts
 - Forecast growth of age groups
 - Household growth in specific community sectors
 - Existing employment levels and forecast employment growth
 - East Devon’s contribution to regional/sub-regional economy and changes to 2040

- Where residents, services, facilities and employment opportunities are located
- Key sustainable transport routes, corridors and other opportunities
- Carbon dioxide emissions

Chapter 2 - Vision and objectives

Matters raised in respect of comments on chapter 2 included:

- There was a challenge raised around how the vision and objectives may be implemented and enforced in practice.
- There were comments that the vision and objectives could apply anywhere and were not East Devon focussed or specific (one respondent said “*it’s quite boring*”).
- Whilst we have not sought to count which aspects of the vision got most (or least) support, there were positive comments made about the importance environmental considerations and addressing climate change.
- National Highways broadly support the vision and objectives.
- Support for the principles of the vision and its objectives, with developer support for meeting housing needs (objective 4).
- In making comment several respondents referenced infrastructure provision, or more specifically lack of it, and raised concerns around affordable housing provision.
- Some respondents did not make comment directly on the vision or objectives but questioned/challenged their compatibility with policy or proposals set out elsewhere in the plan. At its starkest many expressed views that development proposals in the plan (specifically including some larger scale ones) were in direct contradiction to some of the objectives.
- The Vision and / or the objectives could usefully draw attention to the delivery of the second new town given its importance to the delivery of the plan. Such a statement would be entirely consistent with the NPPF
- The Local Plan falls short of its aim of delivering “a suite of ambitious and implementable policies which addresses the severity of the [climate] crisis that we are all facing”. We believe the Local Plan would benefit from bolder and more explicit measures to enable low/no carbon transport and nudge citizens away from single-occupancy private vehicles

VISION (paragraph 2.3)

- The Environment Agency consider that the vision could be more ambitious and have adaption and resilience to climate change as central elements – the consequences of climate will be profound, not just for the economy but also for the economy and society.
- Devon County Council (DCC) consider the vision doesn't help set the objectives and policies in the Plan and should also describe what East Devon will look like in the future (the economic vision on page 25 could be adapted by strengthening social and environmental aspects).
- The vision fails to consider how East Devon residents see their area, why they value and enjoy it, and wish to live in and visit it.
- Devon Wildlife Trust welcome Para 2.3 'A Greener East Devon, which prioritises issues arising from climate change and supports our natural environment.' but think that this statement could be strengthened by rewording to state '...and enhances our natural environment'. It also lists several proposed refinements/amendments to objectives to reflect wildlife concerns and importance.
- The East Devon AONB team welcomed and supported the Vision but queried whether the Regulation 19 submission will rely on the 2019 AONBs Landscape Character Assessment or whether these details will be updated in relation to proposed site allocations
- Some developers criticise the Vision because it is based on the latest Council Plan which only covers the period 2021 to 2023 and will soon be out of date, if not already because of the economic and cost of living crisis in 2022. The Vision therefore falls short of the NPPF requirement to provide a positive vision of the future.
- The developers emphasise that the Vision needs to flow for contextual analysis and its conclusions about the district's strengths, weaknesses, opportunities and threats. A positive vision can be developed to give a clear understanding of the Local Plan's role in responding to issues and threats, whilst capitalising on strengths and opportunities.
- There was a view that we should follow Planning Advisory Service guidance in developing a geographically specific Vision for East Devon for the plan period and beyond. It needs to recognise locational sustainability benefits e.g. of the locations for growth, responding to the following:
 - A direction of travel as to how the Plan area will evolve;
 - The general location of where development will take place and where it will not;
 - What the nature of development activity should be in key parts of the Plan area;
 - How levels and types of development will be accommodated, both in the short and longer term, in specific areas and in the most sustainable way;
 - Reference to the wider context of the Plan area, introducing the concept of co-operation with neighbouring authorities.

- There was a concern that the vision omits reference to the need to ensure non-residential development also is of high quality. It also does not consider built heritage (it focuses only on the natural environment)
- Housing Association planning consortium is pleased that affordable housing is given substantial recognition in the Vision, and supports this issue being a high priority
- Agents for Bourne Leisure advised that, to meet the requirements of the NPPF, the vision needs to provide a positive vision for the area and should be more focused on the area's needs and based upon a full understanding of the baseline context of East Devon. They consider that support for tourism and leisure should feature in the objectives for the emerging East Devon Local Plan, reflecting the character of East Devon as a rural district with significant reliance upon the visitor economy.
- The Devon Countryside Access Forum suggest the second part of the vision should be expanded to say "... including access to the natural environment".
- Exeter Cycling Campaign are concerned that the ambitious vision and objectives may fail to be realised in actual development. They are keen to see the clear and bold specific policies that are currently missing in this draft being stated in the final iteration of the plan.

OBJECTIVES

- Of those that commented directly on the objectives many were supportive though there were also comments around the ordering with various alternative ordering preferences proposed, with a view that ordering amounts to or implies or indicates prioritisation.
- There was comment that some contradiction between objectives is inevitable and therefore they should be weighted.
- Some respondents with specific interest concerns highlighted objectives that they regarded as especially significant.
- The Environment Agency welcome the plan objectives set out in Table 1 and are pleased to see that Objective 2 (tackling climate change) goes beyond net zero and seeks to ensure the district adapts to the impacts of climate change – ensuring the District can adapt and is resilient to the impacts of climate change has the potential to make a big difference locally to long term sustainability.
- DCC state Objective 2 "moves the district towards..." is not urgent enough and should state "To ensure all new development contributes to a radical reduction in greenhouse gas emissions by 2030 (50% reduction on 2010 levels) to achieve net-zero by 2040..."
- Developers consider Objective 2 is ambiguous. Does not clearly articulate the role new development will have in moving East Devon towards net-zero carbon by 2040
- Developers assert that the main method in the plan for reducing carbon and other greenhouse emissions is through the location of development so identifying development at sustainable locations is key

- Some state that objectives and related policy should reflect existing legislation and nation planning policy and guidance, eg Only set performance standards for new housing/building adaptation up to Level 4 of the Code for Sustainable Homes.
- Developers generally support:
- Objective 3, seeking to provide high quality homes to meet needs
- Objective 4, providing support for business investment and job creation. Plan needs to provide for objectively assessed need for employment land
- Objective 5, to promote vibrant town centres
- Amend objective 3 to state 'To provide **sufficient** high quality new homes to meet people's needs **and aspirations**' in order to provide a more positive framework and be consistent with NPPF
- Some overlap between Objective 6 and Objective 1
- DCC state Objective 7 only refers to built heritage which does not recognise the significant amount of heritage assets that do not form part of the built environment.
- Developers support Objective 8 (but have concerns eg about related policy for the level of biodiversity net gain)
- Developers support objective 9, promoting sustainable transport as a matter of principle, but it will need a package of policy responses – the spatial strategy is key
- The Exeter and Sidmouth Cycling Campaign groups support the policy goals and objectives relating to sustainable modes of transport, 20-minute neighbourhoods, cycling, prioritising walking and cycling links and improving the cycling environment
- Need a stronger commitment to working with Exeter City Council to ensure that new development in the West End does not undermine ECC's strategy of reducing single occupancy vehicle use.
- The Local Plan would benefit from giving much more attention to enabling low/no carbon transportation. The references to 'minimising the need to travel and provide access to sustainable transport' have little in terms of hard policy to back them up and deliver them.
- Some comments flow from objective 10 (securing infrastructure). Devon County Council (DCC) state it is essential that infrastructure necessary to support development is provided in a timely manner with appropriate funding mechanisms for education, transport and community infrastructure.
- Developers generally support Objective 11 (supporting sustainable and thriving villages)
- Support for the principles of the vision and its objectives, with developer support for meeting housing needs (objective 4).
- Lyme Regis Town Council support the strategic objectives which underpin the plan and the overall spatial strategy.
- There is no objective about services. DCC would like more emphasis on the need to provide access to good quality education and skills and supporting the most vulnerable.

Chapter 3 - Spatial strategy

Chapter 3 of the plan covers spatial strategy matters and includes a series of policies that refer to scales of development and what is planned where. A great many comments on the plan relate in a general sense to the spatial strategy and policies that would seek to implement it, and many of these are either reported on with respect to chapter 3 of the plan comments or appear elsewhere in other plan chapter reporting in this report. Key generic matters that feature on representations that are not necessarily reported on or captured elsewhere, and that are of general relevance to the spatial strategy and approach of the plan, are highlighted below.

- The Environment Agency state that the plan will need to clearly demonstrate whether there is environmental capacity to accommodate the proposed spatial strategy and distribution. It points out that paragraph 3.11 justifies the distribution strategy on the grounds that western parts of East Devon are closer to Exeter and 'far less constrained' and that 60% of new homes are at Cranbrook and the new town, both within the Clyst catchment, which drains into the Exe Estuary. This catchment is under significant environmental pressure in terms of water quality, flood risk and habitat degradation. When combined with Exeter and Mid Devon growth and a changing climate the myriad environmental pressures will be exacerbated. The spatial strategy needs to safeguard space for climate change adaptation and create bigger, better, more joined up natural networks, including open functional floodplains with blue green infrastructure. The nature recovery mapping and LNRS should be used to focus, target and justify the spatial strategy.
- The Environment Agency note paragraph 3.7, which states that Cranbrook is not specifically covered by the new plan and recommend that the plan address the areas where the new plan goes beyond the requirements of the Cranbrook Plan to ensure consistency of approach.
- Concern was expressed that the plan does not serve East Devon residents.
- Concern expressed that fundamentally too much development is being planned for.
- Infrastructure cannot cope.
- Too much emphasis has been placed on mass sites, encouraging large house builders to develop uniform, unimaginative housing. Encouraging smaller developments and local builders would result in more diverse style of house and support local workforce and economy, thus maintaining the local character that is so typical of East Devon
- Should not allocate sites where the Planning Inspectorate has already refused permission.
- National Highways state that a robust transport evidence base will be required, including two key elements: the individual and cumulative impacts of the Local Plan upon road links and junctions (M5 Junctions 29, 30, the A30 and the A35, plus nearby M5 Junction

31 and the A38 in Teignbridge); and the interactions between the strategic and local road networks.

- National Highways request joint working on transport evidence with Exeter, Teignbridge and Mid Devon districts to ensure the cumulative effects of emerging local plans are addressed.
- Sequential preference for brownfield sites should be a much higher priority/given more emphasis in the opening sections.
- Agents for Hallam Land Management Limited and Taylor Wimpey UK Limited do not consider that the new local plan should address Cranbrook (see para 3.7 of the plan). They highlight that:
 - Policy coverage could call into question the viability of the Cranbrook Plan;
 - Call into question the comprehensive and integrated proposals set out in the Cranbrook Plan, which could result in additional confusion and contradiction in the reading of plan policies, and thereby undermine the whole rationale that the Council employed in its desire to produce a single Cranbrook Plan;
 - There is a risk of further delay as issues and overall viability, debated in the lengthy Cranbrook Examination, are reconsidered.
- Agents for Hallam Land Management Limited and Taylor Wimpey UK Limited consider there are few, if any, policies within the East Devon Local Plan 2013-2031 that provide additional, significant, relevant guidance to the development of Cranbrook (so the existing local plan is not relevant to Cranbrook).
- Agents for the Stuarts (who own land at Gribble Lane in the Cranbrook expansion area) agree that the local plan should not supersede the Cranbrook Plan but its policies should be formally saved after 2031.
- The Avenues Residents Association (Exmouth) set out a case that there are downsides on focusing housing development within or very close to the major conurbations (Exeter & Exmouth). These include that it does not help people maintain roots within communities or help family generations to live close together, (to help with childcare provision). In addition, uprooting people from their natural communities does very little to reduce, and may increase, conventional travel demand
- Working with the Highway Authority: some of East Devon’s vision and objectives can only be delivered by working closely with Devon County Council. The draft Local Plan would benefit from a commitment which echoes Exeter City Council’s Local Plan that “The ... Council is working with partners including Devon County Council as the Local Transport Authority to ensure we have consistent aspirations and approaches”.

Policy 1 - Spatial strategy

Strategic Policy 1 of the plan explicitly sets out a spatial strategy for future development – broadly speaking how much development should go where and why. A great many comments on the plan relate to the spatial strategy and many of these are reported throughout this feedback report, specifically in respect of plan policy that most directly relate to. Set out below are comments that are of overarching relevance to matters of scale and distribution of development.

- Devon County Council (DCC) largely supports the spatial strategy to locate development in the most sustainable locations where new housing is close to employment, services, and facilities and can reduce the need to travel.
- DCC questions whether another new community is the best approach from a transport point of view suggesting greater emphasis on expanding existing towns.
- DCC state policy should encourage mixed-use development at Service Villages to retain vital local facilities and reduce the need to travel, particularly where there is a primary school.
- DCC state there some areas where it may not be possible to mitigate the impact of proposals without significant external funding and therefore these may be seen as unsustainable.
- DCC state development in rural areas will increase the burden on home to school transport, especially when there is no primary school.
- DCC state policy should reflect the key principles of the Education Infrastructure Plan, predominantly local schools for local children, with schools at the heart of the community.
- DCC note that The Role and Function of Settlements report suggests that Smallridge (and All Saints) does not have an hourly bus service; however, there is an hourly bus service within reasonable walking distance so DCC would like this recognised.
- Agree with directing development towards the most sustainable locations.
- Many respondents to the consultation considered that the plan was proposing too much development, reasoning that the potential changes to mandatory housing numbers, the rural/environmental qualities of East Devon, housing should only meet local needs.
- New development should be built on brownfield sites first.
- A limited number of respondents, typically from or representing the development industry, advocating higher levels of development.
- Concern about the ability of Exeter to meet its development needs and a need was identified for East Devon to accommodate an element of Exeter development that the city cannot accommodate.

- Oppose development of a new town – it should be noted that inclusion, or not, of a new town in the plan would most likely have a significant bearing on the overall spatial strategy of the plan.
- Support the development of a new town, including from some members of the public.
- The Spatial Strategy for one large new town means the plan lacks flexibility if problems arise, also meaning a small number of developers will have too much control.
- Developer supports significant development in the West End, promoting land at Addlepool Farm for a new village.
- Object to lots of development (a new town and more) on the western side of East Devon.
- Support concentrating much of the development in the west of the District.
- Concentrating large scale development in the west of the District would lead to the expansion of Exeter that would absorb areas of rural East Devon into a greater urban/city area.
- Exmouth and Axminster featured prominently in comments regarding too much development, but there were challenges to levels of growth across most of East Devon.
- The distribution of development does not align with the settlement hierarchy – some settlements that were higher up the hierarchy had lower growth levels than those lower down the hierarchy.
- There were challenges to the specific tier of the hierarchy that some settlements fall within, including comments that some settlements with limited facilities fall in a grouping with settlements that support a far greater range.
- Must retain the individual identity and community of villages (Woodbury PC).
- There were many comments about infrastructure with some respondents suggesting development should be more closely aligned with infrastructure capacity.
- Sufficient infrastructure is required to stop raw sewage being discharged into our rivers and sea, including the protected Rive Exe (Woodbury PC).
- Devon County Council have concerns about the scale development on the western side of the District highlighting matters around the ability of infrastructure to accommodate planned development.
- The National Health Service (NHS services across Devon) submitted a lengthy representation that examines primary care provision and the projected impacts that would be predicted to arise from development set out in the plan. The NHS assessment shows greatest strains, GP surgeries - physical infrastructure, at overcapacity in the west of the District and some surplus capacity elsewhere. The NHS main highlight points from the more detailed analysis are:
 - Currently there are 14 main GP Practices plus 12 branch surgeries who provide primary care services for the areas identified as being suitable for new developments in the consultation document released by East Devon District Council.

- 9 GP practices (35%) have more patients than they physically have capacity to manage. This picture is more complicated at granular level. 8 of the surgeries that are over capacity and situated in the west of the East Devon district whilst 15 of the surgeries that have capacity are in the north and east of the district.
- In addition, East Devon citizens that live to the west of the district utilise the GP surgeries that are physically in the Exeter City eastern boundary, namely Pinhoe surgery, Hill Barton medical practice and Topsham surgery. All three of these surgeries are over capacity.
- The NHS advise that, during the plan period, there will be an increase in the services provided to the residents of East Devon across the GP practices within East Devon District Council and some within Exeter City Council which will require investment to be able to provide additional capacity to maintain appropriate levels of care. Therefore, the Primary Care developer contribution has been calculated at £560 (This figure is likely to increase due to the rising costs of building material and is currently under review) per dwelling. The contributions will be used to either expand existing GP surgeries or build new surgeries.
- Clyst Honiton Parish Council supports the development of a new town, but wants to work with the District Council to ensure that the development is beneficial to local people and the environment.
- There is already an inability to accommodate existing population levels and new infrastructure provision should come before other development.
- Some respondents advocated more development in rural areas, and some less – there were lots of settlement specific comments captured elsewhere in this report about growth and development at settlements.
- Sites for large-scale employment provision in the West End are not aimed at smaller, local businesses, so the spatial strategy should also support rural employment growth.
- A ridiculous anti-car approach – the absence of a bus route should not make a hamlet unsuitable; a train station should not make large scale housing inevitable
- Hawkchurch is not a Service Village – one bus a week; pub is a restaurant and rarely open; tiny shop; village hall has very few events.
- Growth aspirations expressed in neighbourhood plans and by residents should fundamentally inform how much development should take place at given settlements and as such this should inform the plan strategy.
- Distribution of growth is seen as uneven – e.g. lots in Ottery and little in Budleigh Salterton. Ottery should be a Local Centre like Budleigh.
- Aylesbeare should take more development.
- Cranbrook should be completed before other development is allowed.
- Support Honiton being a Main Centre.
- Support Colyton being a Local Centre given its range of facilities.
- Limited development at Service Villages is contrary to NPPF (para 79) which states villages should grow and thrive – policy should be amended to allow moderate growth appropriate to their scale and identity.

- No definition of the terms “significant development” at Principle/Main Centres and “local needs” at Service Villages.
- Not clear why Colyford has not been identified as a service village whilst other similarly sized settlements (e.g. Tipton, Sidbury, Branscombe) have been – Colyford has a convenience store, post office, community hall, pubs, sports pitch and regular bus service.
- Woodbury Salterton should be a Service Village given its proximity to transport corridors and jobs (e.g. Exeter and Greendale Business Park).
- Upottery Parish Council (and several others) felt that Upottery should be a Service Village as it ranks highly compared to many of the 23 settlements identified e.g., relatively high population and jobs, working age population, ultrafast broadband, and a range of local facilities (four of the Service Villages have equal to or fewer services than Upottery).
- Upottery should have more affordable housing to support its services, the shop (3 miles away) is well used and accessible by car, the village is well connected by internet and has access to a main road.
- West Hill Parish Council support the principles of the Spatial Strategy but are concerned about the loss of countryside from a new town.
- Support West Hill being identified as a Service Village.
- Smallridge/All Saints has sufficient facilities to be considered a Service Village – 8x buses a day, primary school, community hall, pub, sports fields, ultrafast broadband, NCN Route 33 – and should therefore have some development.
- Do not agree with categorising Broadclyst, Colyton, Woodbury, and Lypstone as Local Centres, comparable to Budleigh Salterton which has a high street of shops.
- Support identification of Woodbury as a Local Centre as it has a good range of facilities and is less environmentally constrained than many other villages.
- Whimple and Feniton should be treated as other villages and have limited growth.
- The marine base at Lypstone should be developed as a new town given its good transport links.
- Overall, the Draft Plan should be more ambitious and focused, with tangible and realistic objectives that residents can understand and embrace. In its present form, it is dismal and depressing, foreseeing a future of mass building of low quality, poor services, and declining infrastructure.
- Share out loss of distinctive landscape more evenly across towns and villages – need to go further in Exmouth to get to green spaces.
- Designating Upottery as unsustainable is unjustified and will be self-fulfilling prophecy and place too great a constraint on evolution of village and frustrate investment.
- Upottery should be in Tier 4 given its range of facilities: primary school, village hall, pub (which also sells food), sports field, play area, bus stops, allotment not far away.

- Cowley is well located for The Stables pub, Bernaville Nurseries and Little Explorers Day Nursery, numerous facilities in Exeter, on a regular bus route, and plans for a shared-use path between Crediton and Exeter – this should be reflected in the Role and Function of Settlements study.
- Strategy does not support smaller communities and will not sustain unique character of East Devon.
- Hawkchurch should be excluded from Tier 4 on transport grounds, it has only one bus a week through the village. The one (temporary) shop that the village has is solely reliant on the village community volunteers and it is within the allocation and so will close in favour of developing the site.
- The East Devon AONB team state that any development in the AONB must not only be justified to meet local needs but be sensitively located and designed to respect those settings and conserve and enhance the AONB, taking a landscape character led approach and purposes of AONB designation. The intentions outlined in paragraph 3.37 (m) to farming and rural businesses are supported, but this should not be at the expense of the conservation and enhancement of the AONB and the aims and objectives of the spatial strategy.
- There needs to be a balance between rural growth and protection of the environment.
- The Otter Valley Association broadly agree with the strategic approach and the settlement hierarchy but suggest challenging the housing figures following Michael Gove's statement.
- National Highways support plans that minimise the need to travel, minimise journey lengths, encourage sustainable travel, and promote accessibility for all.
- National Highways have concerns to what extent the strategic road network can support the level of growth proposed to the west of the district.
- National Highways prefer that policies should apply at Cranbrook if the Cranbrook Plan does not cover a particular issue to ensure it is up to date and consistent with the rest of the district.
- More clarity needed on defining what local need at a service village means and this should relate to people living in the Parish except where allocations to meet the district wide need have been made.
- The A3052 corridor where there is already a considerable amount of employment and infrastructure and good access to the strategic road network.
- A major landowner strongly supports the strategic approach and the tiered settlement hierarchy but objects to this policy until the location of the new settlement is fully resolved and the EDNA is available.
- Support the strategy but Exmouth should be the focus for new development on a par with the West End and new settlement
- Support for the principles set out in the policy.

- Barratt Homes consider that Moss Hayne Lane Pinhoe should have a bigger role in meeting housing needs, especially as it is near to Pinhoe railway station.
- Barratt David Wilson Homes support the identification of the 5 Local Centres including Lymstone that are suitable to accommodate an appropriate level of growth. Lymstone is the only Local Centre with a train station
- Wain Homes consider that Budleigh Salterton is a highly sustainable settlement with a strong range of services and facilities that functions more like a Tier 2 settlement than a Tier 3.
- Turley for Bloor Homes support the principle of Strategic Policy 1 and the fact that Sidmouth has been acknowledged as a location for growth within the draft local plan. The town has a range of services and facilities, and public transport facilities. It is therefore a sustainable location for additional growth.
- A site promoter supports the basic strategic vision set out in policy S1, but requests clarification of the term 'western side'. It suggests that the countryside policies in the 'western side' should be more flexible than elsewhere to reflect its more sustainable characteristics. It also advocates a more dispersed strategy to provide a range of deliverable sites, including smaller sites (as required by Government policy).
- Church Commissioners England note that Clyst Honiton is identified as 'open countryside' and emphasise that it is a sustainable and suitable location for development given good connectivity to the road network, Exeter Airport and Exeter.
- Exeter Cycling Strategy state that to make this strategy a success it is important to ensure there are genuinely sustainable travel choices for travelling into Exeter. The Exeter Transport Strategy acknowledges that Exeter's roads have no more capacity for cars, it is one of the most congested cities in the country. The Local Plan must prioritise alternative travel modes to private cars for these developments in the west of the district.
- 3West Developments Ltd supports the spatial strategy, which recognises the strategic function of Exeter. Growth in tiers 3 and 4 of the settlement hierarchy benefits from that focus on the western side of the district that links to Exeter.
- Clyst Hydon parish council is concerned that the EDDC local plan does not provide enough detail on how infrastructure, such as education, recreation, and health care, will be supported to meet the needs of the growing population.

Policy 2 - Housing distribution

This policy proposes the distribution of housing across East Devon over the plan period, broken down by settlement/area in accordance with the spatial strategy.

- Devon County Council (DCC) state the demand for travel to large employment areas such as Exeter has reduced since the pandemic as more people work at home.
- DCC question if a new community is the best way forward as it requires significant upfront costs and high trip rates until facilities are provided – given the lack of rail service in the proposed new town, a better option is to expand existing towns.
- DCC state a new town will require significant education infrastructure, linked to other Local Plan proposals such as at Exmouth and North of Topsham.
- DCC state there is currently no available funding stream to deliver the primary at North of Blackhorse and this should be reflected in the Local Plan.
- DCC state that Cranbrook Education Campus is not large enough to support any development above that identified in the Cranbrook DPD.
- National Highways note the 4,170 dwellings identified at Cranbrook but feel the likely full extent of Cranbrook should be considered based upon higher numbers of homes in the planning applications, to understand the impact upon the strategic road network and infrastructure requirements.
- South Somerset District Council has no objection to overall strategy noting that most development is proposed in the west of East Devon, although it requests a reference to the proximity of Chardstock, Hawkchurch and Kilmington to Chard and considers the housing allocations at Axminster to be disproportionate and likely to increase traffic in South Somerset.
- Home Builders Federation is keen that EDDC produces a plan which can deliver against its housing requirement. So would expect the spatial distribution of sites to follow a logical hierarchy, provide an adequate development pattern and support sustainable development in all market areas
- Barratt David Wilson Homes broadly supports the identification of a hierarchy of settlements that form the basis for growth. Important that the needs of individual settlements are met alongside strategic releases of growth. BDW supports the proportionate share of growth to the Principal and Main Centres, and the greater focus of development proposed for Local Centres, Service Villages and countryside. Annual rate of housing delivery is deliverable/effective
- BDW considers that additional provision at Whimble would respond to focussing growth in the western side of East Devon
- Some respondents queried the difference between the amount of housing in Policy 2 and Policy 3 but others were clear that Policy 3 is the strategic requirement, whilst Policy 2 is about identified supply i.e. how to meet the requirement excluding windfalls.
- The supply figure falls short of the 10% uplift in policy 3 by 465 dwellings, therefore allocate additional sites.
- Consider an uplift to meet some of Exeter’s housing need.
- Grand total should equal at least 18,920 dwellings so that windfalls are not relied upon.
- Use ‘net’ figures because ‘gross’ figures artificially inflate the level of supply.

- Criteria for housing distribution is not clear.
- All the second-choice sites need to be confirmed as allocations to meet the identified housing requirement.
- Proposed housing numbers are too high and are disproportionate to the character, economy, facilities, and infrastructure in East Devon.
- There is a housing crisis so housing needs must be met.
- Investment is needed in new infrastructure (community facilities, education, sustainable transport) alongside new housing.
- Support new housing but need jobs nearby that people can access without increasing road traffic.
- The tourist industry would be severely affected due to the change in rural character.
- The Government's housing targets are no longer mandatory, so district housing numbers should be reduced.
- No indication as to how these housing numbers will be met in each settlement.
- Allocations need to be far more proportionate to the current population size of settlements to share the impacts – for example, Exmouth, Honiton and Sidmouth are much larger and should accommodate more growth; Lympstone and Woodbury have been allocated a similar number of homes to Sidmouth and more than Budleigh which is three times larger.
- Proposals are contrary to Neighbourhood Plans.
- Prioritise mid/high density dwellings in existing settlements over low density greenfield development.
- The road network cannot cope in the western part of the district – examples cited include the A376, A3052, M5 junctions 29 and 30.
- More housing should be allocated to the Local Centres and Service Villages as these are sustainable settlements, to meet district needs, to support local services, and sites are smaller and therefore can be delivered more quickly.
- There is inconsistency in the allocations at Tier 4 with some having no development at all, and others getting 10% plus growth which is greater than Tier 1 and 2 settlements.
- No justification for the total housing requirement at each settlement.
- Do not have confidence in the Government's approach to housing delivery as need is not being met and house prices are too high for local people.
- The plan for many of the villages is fair.
- Develop brownfield sites before other land is allocated.
- Do not agree with selecting settlements with train stations – whilst an advantage, people will still mostly travel by car.
- Network Rail urge the Council to consider the impact of proposals at Cranbrook on Crannaford Level Crossing – development should be refused unless there is evidence that safety will not be compromised.

- A new town of the scale proposed is not justified and would destroy the countryside, including loss of high-quality agricultural land.
- The new town will require substantial infrastructure to make it sustainable and reduce travel to Exeter, which is unlikely to be delivered in a reasonable timescale particularly given recent experience at Cranbrook.
- Developer states delivery is not likely to commence at the new town until the mid-2030s so additional sites should be allocated – developer promoting Addlepool Village for 700 dwellings, local centre, primary school, allotments, sports pitches, open space.
- The homes proposed at the new town should instead be distributed amongst existing towns to achieve faster build-out, provide access to existing services, and benefit the economy of existing towns.
- Farringdon Neighbourhood Plan has been ignored in proposing preferred Option 1.
- Level of development at the new town should be increased to 5,000 dwellings in the plan period given the availability of jobs in Exeter and western part of East Devon – this would remove the need for all the second-choice sites.
- The new town is in one of the most sustainable locations in the South West.
- New town near Exeter and keeping rural areas rural is a good idea.
- Agree that East Devon should build a new town where considerable planning can go into the infrastructure and development, providing housing, jobs, town centre, schools etc. The proposed site near to the A30 and Science Park would make sense as it is near current major road, rail and air links.
- Need to understand the issues with Cranbrook before another new town is considered, numerous social issues at Cranbrook due to its size and scale.
- Exmouth should have significantly more development as the only Tier 1 settlement with the best infrastructure and over 20% of the total population.
- Exmouth is at full capacity for housing, other areas have better access to Exeter where most employment is located.
- Housing numbers proposed at Exmouth are too high given the poor state of infrastructure (doctor's, schools, roads).
- Axminster housing numbers are too high, a 30% increase in the size of the town, in a town that already has poor infrastructure (only one GP practice) and limited jobs.
- Axminster needs a relief road if the proposed housing numbers are agreed.
- Seaton delivered 139 dwellings than required in the current Local Plan 2013-31 so new Local Plan requirement should be reduced and met within existing town boundary.
- Do not allow any building on the green wedge between Seaton and Colyford.
- An appropriate amount of housing is allocated to Sidmouth.
- No more building in Ottery St Mary until the infrastructure is improved – it is very difficult to get a GP appointment, The King's School is over-subscribed, traffic congestion.

- Development at Broadclyst will overwhelm existing services (particularly schools) and is much higher than comparable nearby villages such as Whimble or Westclyst.
- The roads in Broadclyst are not suitable for the proposed number of houses, for example traffic congestion from Broadclyst to Pinhoe.
- Development at Broadclyst is unsuitable because of adverse landscape impact.
- Budleigh Salterton proposals are too high and ignore the Neighbourhood Plan, are on grade 1 agricultural land and in the AONB.
- Do not understand why the hospital site in Budleigh is preferred.
- Too many houses are proposed at Woodbury.
- Whimble is too constrained by the road network and lack of school places and can only take limited development (no more than 10 dwellings).
- 33 dwellings would be tolerated at Whimble, spread over the period 2023 – 2040.
- Too many homes are proposed at Hawkchurch, which should not be in Tier 4 due to limited facilities and jobs and narrow, dangerous roads.
- Chardstock is unsuitable and unsustainable to accommodate an additional 30 dwellings.
- A minimum of 40 dwellings should be set for Chardstock, reflecting its sustainability and the capacity of Char_04.
- Feniton should have more housing as it is well served by facilities and has sustainable connections to Exeter.
- West Hill Parish Council has concerns as the principles of the settlement hierarchy are not carried through to the number of homes to be built – for example, West Hill has nearly 10% proposed growth while Exmouth has only around 2% growth; Feniton and Whimble could double in size; several Tier 4 villages have no development.
- Support the housing provision at West Hill – Blue Cedar Homes control land north and east of Eastfield which can deliver 30 dwellings.
- Sidbury is congested and unsafe to walk and completely unsustainable.
- Clyst St Mary does not need any new houses, the roads around cannot take any more traffic.
- Question why Otterton is assigned 23 new homes when most other villages have none.
- Object to more housing at West Hill as roads are already busy, making it dangerous to walk, and facilities are already strained.
- Would like allocations at Upottery to support services and get future investment.
- No justification for second choice sites because are needed to meet the housing targets so all should be allocated.
- Newton Poppleford and Harpford Parish Council are concerned about the impact of a new town on the character of East Devon and the resulting increase in traffic in Newton Poppleford. The Parish Council advocates transport improvements between the new town and Exeter, additional effluent treatment works and an additional GP surgery.

- The accompanying table falls short of the Policy 3 figure by 465 dwellings so additional land is required to ensure that choice and flexibility in the supply of housing can be made in East Devon.
- There is over reliance on the provision of a new town and major settlement expansion for the delivery of a large proportion of the District's required housing and a larger number of smaller allocations, spread more evenly across the district, would represent a more resilient and robust approach.
- Given small amount of housing delivered in Musbury over past 40 years, more housing should be allocated to sustain local services and facilities.
- Should consider settlements in a group where they use the same facilities to better understand the impact on infrastructure, for example residents from West Hill, Ottery St Mary, Aylesbeare, Whimble and Feniton use the same GP practice.
- Turley for Bloor Homes support the principle of housing development within Sidmouth but consider that the settlement has the potential to deliver a greater level of housing than currently proposed. There is an urgent need for constrained land to be released (as shown in Sidmouth, Exmouth, Lympstone etc). In this context land should be brought forward in unconstrained areas, and outside of that, the most sustainable locations.
- Housing delivery skewed towards West End at expense of high order sustainable settlements like Axminster.
- Axminster could help to meet housing need in Lyme Regis.
- Policy is confusing, including includes development provision at Cranbrook up too, but not beyond, 2031. The second new town should be considered a 'direction of travel' as it took 20 years at Cranbrook from allocation to occupation. The number of units proposed for the new town should be reduced from 2500 to 500 to reflect this and additional allocations made adjoining Cranbrook, together with 'adequate' growth at Exmouth, which too low and should be increased from 7% to 10% to meet local housing need where it arises.
- Additional housing is needed in small hamlets to attract younger people.

Policy 3 - Levels of future housing development

Strategic Policy 3 sets out the minimum net amount of housing growth in the plan period, and splits this into market housing requirement and affordable housing requirement, the latter to be met by a mix of affordable housing types. It identifies the annual requirement for 5-year housing land supply purposes. It provides for supply flexibility through a 10% supply 'headroom'. As well as providing for 10% of supply to be on small and medium sized sites, the policy also balances the aspiration to maximise development on brownfield sites with maintaining housing supply and plan policies to achieve plan objectives and the spatial strategy. The policy makes clear that the LPA will monitor and manage housing development.

It also signals the intention for policy to set out housing provision requirements for designated neighbourhood areas once the Council has consulted on a methodology.

- A very large number of comments were submitted on matters relating to this policy. For ease of reading, the comments are grouped as follows:

- 1) Other Local Planning Authorities
- 2) National Highways
- 3) Comments on Need, Requirements, Supply – split into
 - Community comments (Town & Parish Councils/Public/Interest Groups/Organisations)
 - Developers/landowners comments
 - Registered Providers
- 4) Comments on Market Housing and Affordable Housing Requirements
- 5) Comments on Designated Neighbourhood Area Housing Requirements

Other Local Planning Authorities comments.

- Dorset County Council is broadly supportive of the plan but there are close links between the eastern parts of East Devon and the western parts of Dorset that cannot be ignored particularly around Lyme Regis and Uplyme. Lyme Regis is very constrained. Asking for dialogue to discuss any sites around Lyme Regis that could meet the town's needs and be more suitable than sites in Dorset.
- Note: Lyme Regis Town Council broadly welcomes the proposals for Axminster (role of housing, employment, higher order facilities - serving East Devon and West Dorset)
- Exeter City Council notes the proposed development strategy for East Devon and the inclusion of continued development on the edge of Exeter. Important for the proposals within the city to be considered alongside the proposals in East Devon, on the edge of the city, to ensure development is planned for strategically, recognising cross-boundary impacts and opportunities. The City Council also specifically recognises the proposals for a new community in the vicinity of Clyst St Mary to eventually accommodate around 8,000 homes. Significant cross boundary discussions required to understand the impact of this development.
- South Somerset District Council – comments on the Local Plan relate to commuting and proximity to south Somerset, in particular Chard.

National Highways are concerned that current development management discussions are identifying an emerging potential overprovision of housing compared to the Cranbrook Plan. So allocation growth at Cranbrook beyond 4,170 homes has not been captured within planning policy - this development will either undermine elements of the new town allocation that are yet to come forward, or generate windfalls. Want a strategic policy approach in place for the likely full extent of Cranbrook new community, so they can interpret a collective potential

impact on the Strategic Road Network and consider/secure infrastructure requirements. Transport modelling will need to consider the full extent of the 2nd new town (ie 8000 dwellings, not just the 2500 forecast for delivery by 2040)

Community comments (Town & Parish Councils/Public/Interest Groups/Organisations)

- Many local communities' responses challenge the scale of housing growth stating it is too high, not justified, unrealistic/unachievable. Many perceive the Plan is allowing unsustainable growth at the cost to the environment and quality of living, with adverse impacts. As one respondent expressed it - "Put a stop to this building madness now"
- Many community concerns raised about the impact of housing growth on the environment. E.g. "Devon is being ruined by too much building".
- Concerns over urgent need to address Climate Emergency, and need to take account of environmental and geographical constraints
- Concerns over impact of second homes and short term lets on house prices, housing affordability and supply available to local communities. E.g. "No point building new houses when there are no policies to prevent houses being used as second homes/kept empty for years with minor occupancy for a few weeks at a time".
- Several respondents emphasise there is a housing crisis
- One respondent wants less people, not more housing.
- Concern that there is too much recent inward migration and growth without sufficient money being spent on all the much-needed facilities
- Comments sometimes mix up housing need, demand, supply, and policy provision requirement but this does not obscure the respondents' concerns. Comments on housing need, requirement and supply are set out as follows.

HOUSING NEED

Communities largely want the following:

- EDDC to challenge Government's housing target/approach to need more strongly
- Policy to be updated to be consistent with the Secretary of State's early December 2022 communications. They assert that NPPF has changed and the Government's housing figure has been 'scrapped'/'abandoned'/changed and the figure is now not mandatory but only advisory, so the Council can set its own figure. Other Councils have abandoned Government targets, why won't EDDC? Need to go back to the drawing board. Risk of legal challenge if plan making continues without waiting for NPPF changes and if continuing to use out of date data and assumptions
- Explore the impact of the Levelling Up and Regeneration Bill on housing numbers

- Local Authorities to be allowed to make their own judgements. This will allow a more dynamic and focussed response to the real needs in East Devon
- EDDC to step back and look at housing provision in a properly strategic way. Do not impose house-build numbers where they are not needed and go against EDDC objectives
- Factor in their assertion that the 5-year land supply requirement is being removed
- Only organic growth to meet local residents' needs only and not in-migration 'demand'. Development should not be at the expense of existing communities
- Some community responses consider there is no confidence in the Government's approach to delivering houses and to claiming that the housing shortage can be dealt with by applying a supply and demand economic theory to the built environment on the basis that this will meet need and reduce prices. It has not done either. It has not resulted in local people being able to afford to buy houses - the problem has got worse.
- Community Control
- Many communities' responses want housing need, supply and requirement to be locally driven, where for example:
 - They quote Mr Gove on 'community control'
 - They believe in self-determination of local citizens. Communities tell EDDC what is acceptable and what is not.
 - The Local Plan should not undermine the principle of localism, ie power should be exercised at the lowest practical level close to the people affected by the decision
 - They want the Local Plan to "put local people at the heart of decision making" by limiting housing growth to that in made/submitted Neighbourhood Plans, and/or abiding by communities' views in Local Plan responses.
 - A Neighbourhood Plan is the best way to determine new development sites.
 - A parish council states that Neighbourhood Plans should be respected. They dictate policy. EDDC should cease any proposed changes in light of this
 - Other town/parish councils consider that the Local Plan's reliance on the standard method frustrates/undermines/ignores the role of Neighbourhood Plans and the scale of growth that has community support.
 - It is asserted that EDDC "is blatantly ignoring the electorate's wishes and are blinkered to the destruction they are about to cause".
- Development should not be at the expense of existing communities
- Policy does not mention homes for local people
- No forecast in the plan to show how many of the proposed houses are expected to be bought by local people. Concern that the plan offers up large amounts of land to development to meet a national demand, not local need.
- Local Housing Need Assessment evidence

- Several respondents challenge the technical part of Standard Method/LHNA evidence. For example:
- Assert that algorithms have been discredited. Concerns that standard method is based on household projections and trend migration.
- Formula is based on decades old regional strategies that are no longer relevant
- Should review demographic trends (natural change (births/deaths), migration flows)
- LHNA and housing topic paper do not take 2021 Census into account.
- Assert that no consideration that the only growth in UK population is now a function of immigration which is due to government policy. The 2021 census has reduced the population forecast - yet the building programme neither acknowledges reduced immigration nor population growth
- Some challenge the concept of 'local need' as applied by the standard method. They perceive this as demand driven. Plan should focus should on need, not demand. Impossible to build to meet demand as there is a never-ending queue of people who want to move to Devon.
- Assert that most residents consider local need to be just newly forming households in the neighbourhood and local suppressed demand.
- Housing should be for local people
- Calculation of need does not take account of infrastructure and availability of facilities/ services (the existing ones are already stretched). It does not account of the Climate Emergency, or environmental/ geographical constraints. It is not sustainable. Want these matters taken into account which should significantly reduce the amount of housing provision in the Local Plan
- No sign of public involvement in assessing local needs
- One respondent asserts that during the Assessment of Need for housing, the NPPF HELAA guidance on who to involve in the HELAA work was not followed. This resulted in further problems of inadequate representations regarding health, education, transport infrastructure constraints
- Others challenge the consequences of the standard method's concept of 'local need'
- East Devon has 'natural decrease' in population; growth is due to large in-migration.
- Risk that this trend becomes self-perpetuating as it is built into plan targets.
- Standard method means housing a growing UK population, accommodating largely retired or retiring people wanting to relocate to East Devon. 2021 population is less balanced age-wise than 2011, with highest percentage of people aged 90+ in country. New owners remove opportunity for local families to stay in locality.
- 946 dpa need is grossly overstated based on Government's 300,000 target. If based on target per population, this would need 400,000 to 450,000 homes per year.
- East Devon is being penalised for past record of achieving targets
- One respondent expressly criticises the Local Housing Need Assessment and how EDDC uses LHNA and Housing Topic Paper to justify Policy 3 housing requirements.

Policy formulation is “*smoke and mirrors*”. The documentation should not be presented by LPA as competent analysis of the evidence of need. It’s just “*sheer flummery*”, designed to legitimise a specific policy choice i.e. build more houses no matter what. Documentation conflates ‘need’ and ‘demand’ (the source of unsustainably high numbers in the plan) and is dedicated to obfuscating this merging of ‘need’ and ‘want’.

- Standard method rules apply at the district level, not at neighbourhood level
- Meeting a range of needs
- Local Housing Need Assessment does not provide hard evidence of the actual housing need in settlements. Nor does LHNA take account of housing supply from commitments nor of completions including those historic before 2020, nor future windfalls
- Town Council wants retention and in-migration of young people to be encouraged to maintain balanced population.
- Civic society asserts that Exmouth wished to see reversal on the older age demographic and instead to concentrate on work opportunities and affordable housing for young children/grandchildren. Local plan proposals at Exmouth disregards community’s wishes on this matter as set out in made Neighbourhood Plan 2019

Other matters:

- Devon and Cornwall Police highlight the positive correlation between housing development and population growth. One exists to accommodate the other. Development impacts on police infrastructure. Development should contribute towards cost of providing essential police infrastructure
- One respondent is concerned that the Local Plan is being driven by Exeter City Council ambitions for economic growth. Rather than finding a solution to their land problems EDDC should concentrate on meeting the needs of East Devon constituents.

HOUSING REQUIREMENT

- Many want a significant reduction in the housing requirement, mostly unquantified but with a strong desire that the target is based only or largely on local communities’ need (although one proposes that the housing target be lowered by 20%)
- Numerous community comments asserting that Government policy change means that EDDC can set its own requirement target at a much lower level and should take into account what should be protected in each area.
- Houses are being built to meet short/medium-term targets. Little or no accountability taken for resulting transport, road maintenance, employment, and teenage children. Targets just get forced through, creating more problems than are solved

- Should start by looking at health, education and transport infrastructure and then determine how many people this can support (not just increase housing and hope that infrastructure will cope or that development will fund the infrastructure)
- There should be no more house building until infrastructure problems are resolved
- Why do we need so many new homes when they are unaffordable for local people?
- Housing targets should be reduced except where there is a clear local need for affordable housing
- Strategic planning is being led by landowners - not a healthy model for development. Instead, it should be resident-focused
- The adopted local plan makes housing provision and has many years to run. No need for a new plan and new housing requirement and allocations at this time.
- Questions why we need so many new houses when Cranbrook is not yet finished and still growing and so many new builds all over the countryside
- Where is the evidence justifying this requirement? Is it based on ONS statistics?
- Building 20,000 dwellings over 20 years in a district that has just 72,000 dwellings is too much. Queries whether other rural LPAs are planning to grow by 25%
- Poor presentation of housing numbers. Should be in tabular format with more detailed analysis. Show how target is set and the contingencies shortfalls in getting to target

HOUSING SUPPLY

- A range of community responses on the scale and delivery of supply, and supply sources. Comments on specific allocations are summarised in this report under the relevant policies.

Allocations:

- Many comments on proposed site allocations, and some on omission sites
- As a result of assertions that Government policy change means that EDDC can set its own target, many community respondents conclude that this means less housing supply is needed and so the Local Plan should reduce the amount of allocations
- Size of developments proposed in the Local Plan are on a completely different (large) scale and go way beyond what locals want
- Many advocate using a 'bottom-up' approach to write a community-led Plan. It is a much better method than top-down, often developer-led, approach in strategic planning
- Many comments on the 2nd new town, saying that it is not needed and wanting it deleted or reduced (this would reduce identified housing supply)
- Further concern – as well as 2500 completions to 2040, the 2nd new town is committing the district to a further 5500 – 7500 dwellings post 2040. What is the need for this?

- Alternatively, one respondent suggests reducing the plan target by 20% and increasing delivery at the 2nd New Town to 5000 in the plan period. This enables deletion of all second-choice sites and 20% of preferred sites (many are in unsuitable locations)
- Several community responses want to change how EDDC identifies supply to meet requirement. They perceive that starting from Housing and Economic Land Availability Assessment (HELAA) call for sites is driven by landowner/ developer interests and not in the interest on local community needs. Some want EEDC to “close the door to developers”. Some assert that plan making has lost the trust of local people.
- Some comments on the HELAA (and SA/SEA) evidence refers to errors, omissions, lack of consistency with plan objectives and in application of assessment criteria
- Some want the HELAA process to include residents

Supply total /Deliverability/Supply Headroom:

- EDDC has oversupplied the number of new dwellings, and this should be taken into consideration against future numbers
- Purpose of Cranbrook was to take the pressure off building houses in other areas. This is enough; no need for second new town to deliver housing supply
- Relying on a 2nd new town risks housing delivery delays due to long lead in times, and vulnerability to infrastructure delays. Instead deliver faster housing growth e.g. distribute 2,500 dwellings more widely amongst East Devon towns; and have more smaller sites
- Residents Association asserts that the 30,000 dwellings identified by HELAA, means we don't need 2,500 dwellings from a 2nd new town.
- Alternative view, increase delivery in 2nd new town to 5,000 in the plan period, thereby reducing the pressure to allocate elsewhere
- Unclear why the supply 'headroom' is 10%. How is this figure justified? One comment is that the headroom is non-essential.

5-year housing land supply

- Parish councils raise the issue of deliverability. Housing supply figures must be realistic and achievable. Setting unrealistic targets leads to uncertainty and failure to meet the 5-year land supply requirement.
- One Parish Council is concerned that the housing trajectory being proposed might not be met, and so not have a 5-year supply in place. Inspectors look critically at the likelihood of the trajectory being flawed in this way. So probably a good idea to have a secondary set of potential allocations.

Density

- Impact of density on supply. But contradiction between building at high density and taking account of the areas' existing character and densities eg on edge of villages
- Some want greater use made of other sites within the Built Up Area Boundaries, with greater intensification by increasing densities, including on garden land/windfalls
- Some assert that developers focus on eg 3 and 4 bed dwellings with gardens, and don't want to deliver denser 'town' housing
- Alternatively, one respondent wants reduced densities on some sites eg those that already have a significant density of mature trees/hedges. Should apply Arcadian principles with a maximum of 8 dwellings/hectare
- One respondent prefers building tower blocks within city areas instead of countless more estates and towns with many 2 and 3 bedroom houses.

Brownfield/Greenfield land

- Brownfield sites should be delivered first, and no greenfield sites developed before the brownfield sites are delivered.
- Planning ever more housing on greenfield sites is seen as the line of least resistance to accommodating lucrative building development
- Most allocation are greenfield; a consequence of the Call for sites approach, and the site selection process
- Don't use greenfield sites/AONB to fuel the housing market
- No greenfield land should be used – must preserve land for food production
- CPRE analysis of brownfield reports in the SW highlights brownfield capacity. Must be plenty of brownfield sites in the district that developers should be encouraged to use
- What is the evidence of brownfield land and availability? Insufficient work has been undertaken to explore potential redevelopment of the town centres, eg land owned by EDDC including many car parks. Wants a comprehensive study/report.
- Make a bigger provision for windfalls. Brownfield site opportunities not fully explored. EDDC owns several suitable sites that have not been put forward EDDC should be more proactive and stimulate redevelopment of underused or brownfield sites
- At some settlements (e.g. Exmouth, Honiton, Seaton) numerous community responses want to 'prioritise' use of brownfield land as a starting point, or only use brownfield land eg
- Redeveloping or refurbishing disused offices/shops/other buildings /structures for housing, repurposing older, larger houses into flats; developing unused town centre spaces; use some carparks. E.g. old post office and old pub at Beacon Hill Exmouth
- Redevelop the Magnolia Centre. Add storeys on top of existing buildings.

- Redevelop Exmouth town centre. “*Risk of flooding town centre is nonsense, - there is a flood defence scheme*”. Flats were approved and built eg on the Q club site
- Cost of redeveloping brownfield sites and impact on viability should not be the main determining factor on land use.
- Should develop the many brownfield sites in Exeter, not a greenfield 2nd new town site

Other matters

- No need for so much new housing supply. There are hundreds of unsold new properties and hundreds of aged properties in this area that need to be occupied.
- Bring empty homes back in to use as much needed housing
- Consider Liverpool's £1 house sale for disused and decaying housing stock.
- Opportunities for modern methods of construction. Is East Devon looking to other cities and countries, for example, who are seeking to achieve similar objectives? Housing constructed off site vastly reduces construction waste, is just one example. East Devon has a chance to really take on board existing solutions and take action
- Look at alternative housing solutions eg green pods for emergency housing
- Devon Wildlife Trust wants policy to include specific reference to the environment with specific minimum targets for greenspace and green corridors.

Developers/landowners comments

- There is a range of developer /landowner comments
- Strong support for a minimum housing requirement
- The Council has correctly applied the Standard Method, using latest affordability ratio
- The Standard Method of calculating housing need is a starting point and a minimum. Need to consider evidence about growth and unmet need for other authority areas
- Importance of delivering dwellings to meet need and growth
- Importance of maintaining housing supply and supply flexibility
- Challenges to supply components and supply forecast – need more evidence on the viability and deliverability of the supply categories, including allocations
- Several respondents conclude that additional land needs to be allocated to meet requirement and flexibility, justifying their sites being added to the list of allocations
- A few respondents refer to a housing crisis

More specific comments as follows:

HOUSING NEED

- Some developers say that despite the rhetoric and opinion about Government pronouncements and possible consequences for housing delivery, in terms of requirements there has been very little change. No change to the Standard Method. Government remains committed to delivering 300,000 homes pa by mid 2020s.
- LPAs must plan to meet housing needs. Policy housing requirements must have some relationship with that need. Where they deviate, this must be justified but only in exceptional circumstances. EDDC should focus on meeting needs and not be distracted by possible changes to NPPF.
- Several developers' responses support the use of the Standard Method to assess local housing need. Support conclusions and evidence in the LHNA 2022 (about technical demographic data) and Interim Housing Topic paper concludes there is no evidence that exceptional circumstances apply in East Devon at this time to justify calculation of minimum local housing need in any other way than the Standard Method. No justification for an alternative assessment of need. Should resist calls for a lower Local Housing Need figure. No grounds for seeking lower local housing needs figure.
- The 946 dwellings pa should be 'fixed' as the starting point for the Local Plan
- If the affordability ratio worsens between now and plan adoption, then the local housing need figure should be revised accordingly
- PPG suggests need higher than Standard Method could be appropriate – Local Plan needs to consider implications of: Growth strategies (notably the balance between jobs and homes); and housing affordability. For the latter
- Topic paper confirms that the local housing need figure has been updated to 946 pa using the most recently published affordability ratio.
- PPG – use of Standard method **starts** to address affordability
- Average completions 931 pa is broadly comparable with standard method rate. But affordability ratio is worsening. So need more than 946 pa to improve affordability
- Draft plan wouldn't deliver affordable housing to meet Policy target.
- Some respondents are concerned that the Council has not considered establishing an alternative level of housing need, beyond a standard method, because the assessment of housing need has not considered growth strategies (i.e. economic growth).
- Plan has not been informed by an Economic Development Needs Assessment.
- Need to assess if evidence on economic growth and ability to house the workforce to support forecast number of jobs means that local housing need figure and requirement should be higher than the Standard Method need figure. Plan should not progress until the EDNA is integrated with the LHNA evidence and this assessment is available to inform strategy and policy.

Needs of other areas:

- Some respondents are concerned that the Council has not considered establishing an alternative level of housing need, beyond a standard method, because the assessment of housing need has not been informed by strategic cross boundary matters (housing).
- EDDC should fully explore the circumstances in line with PPG
- One agent for several landowners asserts EDDC is *failing* in its Duty to Cooperate, to responsibly/sustainably identify/ allocate appropriate land for development.
- Exeter City Council position that it can meet all its development needs within the city is undeliverable and unviable as it proposes to build around 8,000 homes on high performing brownfield employment land when it is already 2,000 houses shy (pro rata) of an at least housing requirement of 12,000 in the current plan period.
- Chronic housing supply shortage in Exeter and East Devon. EDDC has not considered the needs of other Councils and whether other LPAs can meet their development needs. East Devon will likely have to accommodate a significant proportion of Exeter City's development "needs" because either housing will displace employment land or land will be required for Exeter's housing needs in other districts, including in the "West End" of East Devon. Must engage with ECC - ensure development is delivered in the most sustainable locations around East Devon.
- Another queries the extent of land available to deliver homes in Exeter City, the statements made in urban capacity assessments, and whether this is realistic. EDDC needs to consider an uplift in housing numbers to accommodate some of Exeter's need, or at least have a contingency in place to react if that becomes clearer over time – i.e. potentially identify reserve sites to deal with this
- To what extent does the 18,176 need figure consider Exeter overspill (ie extent to which Exeter, constrained by key environmental considerations (eg flood plains) is unable to meet its own housing needs; does this plan seek to meet any of that need
- Some developers reserve their position to look at requirement target at Reg 19 stage. New evidence will come forward to change the assessment of local housing need. Eg new affordability ratios in March 2023. Neighbouring local plans may provide evidence of unmet need that could be delivered in East Devon.

HOUSING REQUIREMENT

- The Local Plan should deliver against its requirement
- Most developers' responses support the use of net minimum requirements. Important that the Plan continues to express housing requirements as a minimum.
- Some reserve comment on the scale of requirement pending sufficient evidence to comment meaningfully

- Some developers have concerns about the plan-making timetable. Anticipate delay in plan-making process Some want to extend the plan period to 2041 or 2042 ie providing 15 years from adoption. Amend policy to cover the period to 2042
- Some support the scale of net housing requirement set out in policy. Unless evidence justifies using an alternative method, then local housing need is 946 dpa
- Need to fix the LHN figure as the starting point so that plan making can progress. Policy imperative is to deliver sufficient housing
- Plan should provide for growth, not just for need
- Some want a higher net requirement to support economic growth
- Some want a higher net requirement deliver additional affordable housing or to meet unmet need e.g. from Torbay/Exeter/Mid Devon/Teignbridge/Dorset (specifically Lyme Regis)
- Need for Duty to Cooperate collaboration on cross boundary strategic housing issues – where is the evidence of ongoing collaboration?
- Statements of Common ground on Duty to Cooperate and Strategic Cross boundary issues (housing) should be agreed prior to submitting the plan for examination
- One house builder wants the sustainability appraisal to test options for 5%, 10%, 15% uplift of requirement above housing need figure. These options are deliverable and there is housing land available to achieve this.
- One respondent concludes that a requirement in excess of 1000 dpa is appropriate (taking account of 2018 based household projections)
- Supply shortfall (138) in current (adopted) local plan since the start of that plan period should be taken forward and added to the housing requirement for the emerging plan.

HOUSING SUPPLY

- A range of developer responses on the scale and delivery of supply, and supply sources Comments on specific allocations are summarised in this report under the relevant policies.
- Must plan to provide comprehensively for housing requirements across the district.
- Important to consider how the scale and location of housing from the supply sources (notably the allocations) benefits the economy e.g. build housing where the jobs are, to provide a local labour force/reduce commuting
- Essential to provide headroom and flexibility to provide greater certainty that housing requirements will be met, and ensure choice and variety
- Some developers conclude that identified supply meets the requirement based on the standard method but is short of the housing requirement plus 10% headroom, so policy 3 is unsound at present. More sites need to be allocated.

- Some developers challenge the anticipated housing supply delivery and want more allocations to provide greater certainty of achieving the target. They query:
- Sites' suitability, availability and achievability/viability
- Sites' delivery. Need to compensate for longer lead in times/slower build rates by delivering additional sites earlier and achieving policy headroom
- Concerns about the plan-making timetable. Anticipate delay in plan-making process Some want to extend the plan period to 2041 or 2042 ie providing 15 years from adoption. Amend policy to cover the period to 2042 and identify additional housing land
- Shortfall of 753 homes when comparing Policy 3 requirement (18,920) with Policy 2 distribution (18,167). Shortfall should be planned for
- Mismatch between policies 2 and 3 needs to be corrected; use net figures
- Some comments on the HELAA (and SA/SEA) evidence refer to errors, omissions.

Specific comments/concerns about the following:

- Delivery and Housing Trajectories
- Lack of a detailed Local Plan housing delivery trajectory to 2040a and related evidence. This information is of fundamental importance to the plan. Review spatial strategy when evidence is available.
- Others reserve their position on the trajectory.
- Current monitoring demonstrates that delivering over 1000 pa is achievable
- Plan's policies not yet tested for viability. Some sites may not be viable
- Supply of a large number of new homes can often be best achieved through planning for larger scale development e.g. new settlements or significant extensions to towns and villages
- There is a role for landowners who own significant holdings in a single ownership to deliver meaningful contributions toward housing delivery
- This is an area with a successful track record of strategic sites i.e. Cranbrook
- Alternative view - Questions over ability to maintain a steady supply of completions annually across the plan period
- Anticipated that new town will have lengthy lead in times – evidenced e.g. by Letwin Review; Lichfields, Buchanan
- Plan is overly ambitious on the delivery of Cranbrook and the 2nd new town
- Would expect new town to be guided by a separate Development Plan Document, which could not be submitted for EIP until after the new Local Plan is adopted so need to add the time this takes to reach adoption to be factored into site's trajectory. Unlikely to commence housing delivery until mid 2030s
- The principle of a second new town should be considered a 'direction of travel' and the delivery forecast should be reduced from 2500 down to 500 (maximum)

- One respondent asserts a build out rate of 160 dpa in the 2ns new town would be ambitious, and only deliver 960 to 1120 dwellings. A more conservative build rate of 50 dpa would only deliver 300 to 350. The 1380 to 2200 dwellings shortfall should be provided by other sites in more deliverable locations elsewhere in the district
- Another respondent also challenges the Plan's reliance on a new town delivering dwellings from 2030. Very long lead in times for new town development. 300 pa delivery rate in the new town is unrealistically high. At 60 dpa/outlet, it needs 5 outlets delivering at any one time (unlikely given present ownerships). Delay in the plan's adoption will delay planning applications' submission post-adoption. Considerable timescale and lag due to evidence required for applications. Also, a new settlement takes time to mature to deliver a volume of dwellings (i.e. considerable gearing up). I.e. less dwellings delivered in plan period
- Lack of trajectory evidence means it is not possible to ascertain eg whether the 2500 dwellings can be delivered in the new town by 2040
- Could extend new settlement to other land ownerships – to increase outlets
- Need more outlets, multi-phasing, plus more sites delivering housing in East Devon.
- Alternative view by a site developer for the 2nd new town. The number of dwellings that can be delivered in the new town in the plan period could be higher than 2500. Need to discuss delivery trajectory with the LPA.
- Reliance on 7250 dwellings in allocations (including Cranbrook) out of the total of 11811 dwellings in allocations in the West End of the district. Risk of stalling delivery and land supply issues if infrastructure delivery issues arise.
- Need to consider constraints evidence – Need to take the presence of the Exeter Airport properly into account, not just noise but safeguarding.
- Embrace the Lichfield evidence approach ie Enhance/speed up delivery by using higher amounts of affordable housing, (ie 35% affordable housing at new town).
- Concerns about the combined impact of onerous policy requirements. Need for more flexibility for residential development so as to not render development unviable and undeliverable.

Allocations

- Many detailed, technical comments on allocation sites (evidence and selection) Housing land supply relies on all allocated sites (preferred and second choice sites).
- No room for manoeuvre in housing land supply if needs/requirement are to be met.
- All the sites need to be confirmed as allocations in the Local Plan if the local Plan is to be able to demonstrate a sound approach to meeting needs. Ie all are 'preferred'.
- Remove concept of 2nd choice sites. It is confusing. Naming sites as second choice is not transparent. The public may not realise these sites are no different from first choice,

as all sites are needed if the requirement is to be met. As a result they may not have commented on sites.

- Housing land supply also relies on delivery of Cranbrook DPD Expansion Area allocations, and other supply sources.
- Some landowners queried why historic SHLAA sites (submitted pre-2017) were not assessed in the latest SHLAA process
- A number of emerging policies contain requirements that will have financial implications on development. To ensure that the allocations proposed within the Plan are deliverable propositions and therefore are effective, the financial implications of these policy requirements should be considered in a detailed viability assessment (references Policies 28, 40 to 44; 55, 62, 67, 68, 72, 86, 87, 97, 107/108).

Commitments

- Plan relies on this housing supply source to be delivered in the plan period to achieve requirement targets 23% of supply is from extant permissions – some sites will stall/permissions lapse
- Some dwellings that have been counted as 'commitments' have now expired eg 17/0893/MOUT at Musbury
- EDDC needs to provide an analysis of previous lapse rates and delivery performance compared to previous plan trajectories

Windfalls

- Need certainty about delivering the housing target. Do not rely on windfalls to reach a 18,920 requirement. This is not robust as windfall sites are not identified. Without windfalls forecast supply would be 753 short of requirement and 2,663 dwellings short of requirement plus 10% headroom. Need to identify more land for housing.
- Need compelling evidence for including windfalls in supply
- Should not include Neighbourhood Plan allocations as windfalls (because they are allocations)
- Potential for double counting windfall provision – need to continue avoiding double counting for future plan making stages
- Unclear whether windfalls have been included in the 8% oversupply

5 Year land supply

- Important to demonstrate a 5-year land supply at point of plan adoption.
- Securing a 5 year land supply is critical to the Local Plan's success

- Evidence needed to demonstrate delivery housing prospects (ie the district trajectory and details of commitments' and allocations' site trajectories)
- Cranbrook and the New town are 56% of the allocations, but are unlikely to come forward or be wholly complete in first 5 years of local plan adoption
- To ensure a healthy supply of housing sites can be maintained it would be sensible to allocate a number of smaller sites to maintain delivery numbers in the early years of the plan before housing at any 2nd new town becomes available.
- Over-reliance on delivery at Cranbrook contributed to the Council currently being unable to demonstrate a 5-year housing land supply
- The current 'shortfall' in the 5-year housing land supply and 'undersupply' for the current plan period needs to be addressed by EDDC and the shortfall rectified by allocating sites in the emerging Local Plan.

Headroom

- Several developers support the principle of a headroom (flexibility allowance) of about 10%, as positive and a sensible, positive and pragmatic response to housing delivery uncertainty
- Some consider 10% headroom should be a minimum.
- A 10% supply headroom is not sufficient to ensure consistent delivery throughout the plan period because the plan relies on housing supply from the new town. Want 20% headroom, and for the delivery forecast for the new town to be reduced
- Want a higher percentage headroom of 15 to 20% specified in policy to provide more flexibility, asserting the plan relies on strategic sites (such as the 2nd new town) with higher risks, and has historic housing supply issues - including not have a 5-year land supply now. The additional supply should be identified through site allocations in the plan.
- Draft plan only identifies sites that might achieve an 8% headroom. Want additional sites allocated so headroom increases from 8% to 10%
- One developer asserts that the 1521 dwellings comprising the 8% supply headroom is unallocated. No evidence that the unallocated dwellings will be allocated. If a headroom is provided the additional homes should be allocated.

Small/medium sized sites

- Continuing role for non-strategic sites to ensure housing supply continuity, particularly early in the plan period
- Strategy of smaller sites in shorter term and larger strategic sites in longer term is the key to delivering the housing requirement

- Plan should define ‘small and medium sized sites’
- Small and medium sites are important. Can be built out more quickly and benefit the local economy, support rural vitality, have less impact eg on environment/resources
- Small sites can face difficulties in providing requisite infrastructure
- Has 10% of supply from small/medium sized sites been achieved? Some developers want more eg 15% or 20% of supply delivered on small and medium sized sites to provide choice, and more opportunities for SME builders.
- Want more small sized developments and smaller builders, not the national ‘giants’
- SME builders/smaller sites support delivery of high-quality local homes

Monitoring

- Need to update supply information with latest monitoring
- Potentially more supply in Cranbrook Expansion Areas- latest planning applications
- Important to have plan targets and to monitor housing delivery. EDDC needs to provide more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

Brownfield/Greenfield Land

- Most developers support the use of greenfield land.
- Greenfield site eg on the edge of a town can be more environmentally friendly. It allows more space to bring up a family, ability to work from home, avoid using a vehicle every day
- Town centre brownfield sites may not be suitable for families as they can be small dwellings, over developed, with little/no gardens and no parking. Hundreds of town centre flats may help hit targets but would only help a part of the population
- Some challenge ‘maximising’ use of brownfield land. They prefer ‘optimising’ its use.
- Support for balancing the maximising of housing delivery on brownfield land with the need to maintain housing supply and deliver spatial strategy/vision and objectives

MARKET HOUSING AND AFFORDABLE HOUSING REQUIREMENTS

- Range of community views on the amount of market housing and affordable housing requirements.
- Although supporting affordable housing provision, community responses raise concerns about the affordable housing definition, and the reliance on development to deliver. Most affordable housing isn’t affordable. Rising interest rates makes the problem worse (this point and related issues are captured in comments on Policies 39 and 40)

- Some community support for the affordable housing requirement, to support young families who bring life to the community, not create a retirement ghetto for the rich retired and affluent incomers
- East Devon affordability ratio is very high (nearly 11 times incomes)
- Some want all new housing delivered to 2040 to be affordable housing; and include sites allocated in Neighbourhood plans for affordable housing
- Should select sites for allocations that are suitable for delivering affordable housing
- Policy wouldn't deliver even for half of the dwelling requirement as affordable. Of the 18,000 homes supposedly "solving" the housing crisis in which people cannot afford their own home, only 4,000 are affordable. The rest are for profit.
- Plan has an affordable housing requirement of 4,070 dwellings. But current evidence indicates realistic prospects of delivering 3,551 dwellings in the plan period (shortfall of 519 dws). Possibility that some of the 3,551 affordable homes won't come forward
- One town Council considers the affordable housing requirement should be at least 25% (and more should be social housing). Some want the vast majority to be affordable.
- Some community respondents want a higher proportion of affordable housing. Eg 40% Concerns about staff recruitment due to lack of affordable housing.
- Designate site specifically for social housing or for private rent that can be afforded
- Want restrictions to stop landlords buying up affordable homes to rent out at high rates Considers that social housing targets are redundant - inability to influence the number of social/affordable dwellings delivered by development (lack of funding/legislation)
- Some consider that the proportion of market and affordable housing is about right
- Are there alternatives to delivering affordable housing through planning obligations, that will achieve affordable housing requirement and reduce market housing requirement?
- Some concerns that the market housing requirement is far too high – it will draw in people from other areas and increase out commuting to Exeter.

Range of developer views

- Affordable housing target will help to ensure effective monitoring of affordable housing delivery and that sites for affordable housing development continue to come forward.
- Most effective way to deliver affordable housing is to plan for adequate housing growth where affordable housing forms a specific percentage, secured through planning obligations. Reducing overall housing requirement would impact negatively on the amount of affordable housing delivery to 2040.
- Council's evidence base is a robust and strong justification to plan for higher levels of housing growth if the increasing affordability concerns are to be addressed

- Shortfall of forecast supply against affordable housing requirement. Should increase the affordable housing supply by allocating more sites, and not by requiring a higher percentage of affordable housing
- Need to evaluate Policy 40 assumptions (35% and 15%) against overall plan viability
Impact of settlement hierarchy – restricting housing supply drives up property values and rental costs as insufficient open market housing and affordable housing delivered
- An agent for several landowners highlights the acute and worsening shortage of affordable housing in Exeter. The East Devon Local plan must prioritise securing appropriate, viable levels of affordable housing within the plan period in the context of Exeter's chronic undersupply and the issue faced across the sub-region.

Registered Provider views

- Imperative that efforts are made to deliver as much affordable housing as possible
- Reassured that the affordable housing target figure is set as a minimum requirement
- Important that the affordable housing threshold is kept under review to maximise opportunity to deliver. Threshold should be as high as viably possible to meet District's needs. Affordable housing is important in tackling wider economic issues, including suitable housing for the working population.

DESIGNATED NEIGHBOURHOOD AREAS – HOUSING REQUIREMENTS

- Some support for strategic policy to set housing requirements for designated neighbourhood areas
- Some support for the intention to consult on a methodology to justify housing requirements for designated neighbourhood areas.
- Some respondents reserve right to comment when method/data is available
- Community concerns that Local Plan allocations have already prejudged 'local' requirements, and instead requirements should be based on local residents' needs.
- Should re-evaluate how many dwellings of what type and target market are needed then work alongside Neighbourhood Plans to encourage small pockets of organic growth with appropriate dwellings
- One Parish Council wants EDDC to contact the Town and Parish Council to ask if and how many new dwellings would benefit their communities
- Lack of requests for housing provision requirement figures from Neighbourhood Planning Groups indicates that local residents do not want more houses
- One respondent wants the figures to be realistic to avoid speculative development in unsuitable locations. Methodology for determining DNA housing requirement should:
- Focus on whether the growth can be accommodated

- Not be absolute (ie only “up to” a specified number).
- Include the figures in Strategic Policy 2 (ie completions, commitments, local plan allocations, second choice sites).
- If an additional allowance for windfalls is included this should take account of heritage assets, landscape designations, biodiversity, flooding and agricultural land quality, infrastructure capacity and local issues
- Lympstone residents were advised that adoption of a Neighbourhood Plan would prevent unwanted and unsustainable development in the village. The Plan is being ignored by EDDC. Other comments elsewhere raise similar concerns.
- Emerging Clyst Honiton Neighbourhood Development Order, accompanying the Neighbourhood Plan (now at Reg 14 stage) would provide permission for about 50 dwellings, that would contribute to the windfall numbers within supply.
- Church Commissioners England state that neighbourhood area housing requirements should accommodate sites within emerging Neighbourhood Plans and should not unduly restrict sustainable sites coming forward over the plan period
- One developer supports strategic policy identifying housing requirement figures for Designated Neighbourhood Areas. This is positive. But figures should be expressed as minimum, to accord with NPPF
- **Note:** Under Policy 2 some developers advocate the use of a robust methodology to determine the housing requirement for each town and village in the settlement. It should be noted that Settlements are not the same as Designated Neighbourhood Areas.

Consistency between Policy SP2 and Policy SP3

- Some respondents queried the difference between the amount of housing in Policy 3 and Policy 2, but others were clear that Policy 3 is about the strategic requirement and Policy 2 is about identified supply ie how to meet the requirement excluding windfalls.
But :
- Policy SP3 and Table 1 in the Topic paper express supply in net terms. To avoid confusion, policy SP2 should also be expressed in net figures, as gross figures artificially inflate supply, and would fail to meet housing requirements.
- Need change to policy SP2 so that second choice allocations are confirmed as full allocations (i.e. no distinction between allocation sites)

Detailed technical analysis

- Submissions from developers include to refer to detailed technical analyses related to housing need, supply, and mix and the translation into Local Plan policy housing provision requirements. This is too detailed for this Feedback Report analysis but will be

collated, grouped and analysed in the forthcoming updated Housing Topic Paper on housing need, supply, requirement and affordable housing.

Omission policy

- Sidmouth Town Council want the Local Plan to introduce controls on the use of second and holiday homes. Should not wait for a problem to escalate before taking action.
- One respondent wants a “no second home’ clause to apply to the seaside towns
- EDDC should adopt a policy to levy higher Council Tax for holiday lets or second homes to address the issue of housing not being available or affordable to local people

Policy 4 - Employment provision and distribution strategy

Strategy 4 states that the West End and the tier 1-4 settlements will be the primary focus for new industrial, warehousing, offices, distribution development and other B Class Use employment development. Informed by the Economic Development Needs Assessment a choice of appropriate land will be made available in sufficient quantity, and of the right quality, to drive the economic growth of, and support prosperity in, East Devon.

This strategy received broad support, with many respondents agreeing that employment development in close proximity to housing is essential to achieving sustainable settlements. The need for high value jobs was strongly supported, although several people were concerned that lower paid, caring and service roles are essential and should not be overlooked.

- Devon County Council note that environment and social issues should balance the economic vision to enable sustainable development.
- Exeter City Council advises that the City of Exeter has significant economic and employment growth potential, but it cannot all be accommodated within the city, given the constrained supply of employment land, and little scope for new potential employment sites. Some of the future economic growth stimulated by the City of Exeter will need to be accommodated in its hinterland in adjoining local authority areas, where they are functionally part of the city. Noting growth in key transformational sectors such as data analytics, environmental futures, health innovation and digital communications
- The East Devon AONB team suggest a definition of ‘appropriate land’ is needed. In rural areas it might be seen to be socially helpful to encourage diversification, but that may be at the expense of essential character of the AONB. Any proposals brought forward should be considered against the landscape character and natural beauty of the AONB in that location.

- Employment land should be allocated on the basis of evidence of demand and whether the sorts of jobs will help the economy and not just provide entry-level jobs.
- This development of employment locations must be accompanied by provision of active and public travel so that the private car is not baked in as the only means of travel to these employment sites.
- Some new businesses good for local employment but in rural Devon often better in clusters.
- Super appeal (at Feniton) showed little likelihood of increasing local employment and there are vacant units.
- Already too much employment land in Sid Valley.
- SidCOC - We [would] expect to see a coherent framework for recovery and growth beyond allocating slabs of bare employment land. Try as we might, we cannot find anywhere in the Local Plan anything which resembles 'a positive strategy for the future development of town centres'. It simply does not exist.
- SidVA - We question the evidence base for these proposed Policies under [Policy] No 4 as the Council advise the 'Economic Development Needs Analysis' (EDNA) will not be available until an unspecified date in 2023. By the Council's own admission the 'Scale of Development' will be determined by the EDNA. The Council later say in para.3.54 their existing 'evidence is now out of date'. We consider that these Draft Local Plan proposals, are uninformed & unsound without an Evidence Base through the 'EDNA'.
- Use of existing sites should be prioritised. Existing sites should be improved- greening them, providing better facilities, maintaining 100% occupancy - allowing pop-ups if necessary.
- Employment sites should not be lost to/secondary to housing
- Focus should be on green jobs e.g. insulation, renewables and natural environment
- Need clarity as to the role of the Enterprise Zone
- Local Plan should be more focussed on the local economy, not just housing. Needs an economic strategy
- Economic growth should determine housing numbers not the other way around
- Need to ensure that economic growth reduces consumerism and is genuinely sustainable and life improving
- Reliance on less well paid seasonal and tourism jobs should be reduced. Lower paid, essential jobs- such as carers- should be valued and paid more
- Young people need better quality jobs, don't just promote B uses. Consult young people and provide sustainable, high tech, long term jobs in emerging industries
- Does the plan intend to draw trade from elsewhere e.g. north of England.
- Need to emphasise the importance of adequate wifi for small businesses especially in rural areas.
- Small sites within housing developments e.g. in Exmouth is impractical.

- Plan doesn't recognise shortfall for existing communities, need better services and infrastructure and a realistic plan to ensure employers will actually take up the sites
- This strategy is being used to justify the new town which is only needed to meet Exeter's shortfall
- None of the proposed businesses will produce anything for export out of the area, eg farm produce. Incentives are needed: this will include transport to the main network outwards from towns.
- The Science Park could be developed for high tech clean industry
- New town should not include/justify expansion of Hill Barton
- Affordable housing is key to recruiting in the construction, health care and hospitality industries.
- The increase in industrial areas in such a small area of Devon is unreasonable. Most people travel to Exeter for work as small employers do not pay as well, in an area of already shamefully low pay.
- More training centres for skilled jobs that are needed, e.g. nursing, engineering before jobs can be 'created' in today's economic climate
- Strategy needs to recognise that working patterns are changing and more work from home so less land is needed
- More good quality employment is needed, however to reduce car use this must be more local and bus services need to improve.
- Jurassic Centre in Seaton cost £2M could be a super community training hub and conference centre perhaps a key focus on hospitality, care skills, leisure and tourism etc.
- National employment market is changing as we export less. This plan can't predict what will happen.
- Support the approach to meet the district's employment land requirements by focusing development on the western side of the District
- The Draft Local Plan proposals, are uninformed & unsound without an Evidence Base through the 'EDNA'.
- This proposed Employment Land policy makes no mention of employment from Retailing, Hospitality, Tourism and the increasing trend to remote/ home working.
- Support the requirement to link housing development to increases in employment land.
- Support resisting loss of employment land and the strategic policy to achieve this. This approach should be further strengthened by a policy that limits housing development if additional employment land is not developed in parallel.
- Support joint working with Exeter, Mid-Devon, and Teignbridge Councils and provision of extra employment land sufficient to accommodate the additional jobs required and site to be suitable and minimise commuting.
- Many of the jobs created through the West end development end up creating jobs for Exeter residents, not East Devon.

- Manufacturing industries should be encouraged to come to the area. Trust Marsh Barton will be redeveloped now it has a railway station.
- Greater emphasis should be placed on providing job opportunities in locations that are easily accessible by existing residents to prevent the out-migration of workers to Exeter eg from Exmouth.
- How do you define high quality, high value jobs?
- Tier 3 & 4 villages need space for Workshops, office hubs, craft manufacture, micro business, professional workplaces, web-design, architects, legal, planning Consultants.
- There needs to be a choice of appropriate land in sufficient quantity and of the right quality.
- R & D and light industrial are crucial to the East Devon economy, and to the Airport. They should be properly planned for with clear policy provided in terms of quantum and location.
- Improved infrastructure is essential
- New development should be of a scale that it won't adversely impact on existing settlement character
- Amenity of existing residents should not be impacted by new employment development
- No green space/wildlife should be destroyed to make way for new employment
- Not on good quality agricultural land.
- Towns need more small business units, suitable for sole traders/crafts/start ups (one made reference to Seaton)
- East Devon lacks the skills to drive/support economic growth
- Thriving town centres should be a priority, but it barely gets a mention, as should encouraging tourism.
- This is a sensible strategy, not to forget small scale / community commercial projects in appropriate rural village locations
- Object to further development at Hawkchurch, the infrastructure isn't sufficient
- Chardstock isn't suitable for further development, it should be considered countryside.
- When employment proposals are quantified, need transport evidence to consider the impact upon the strategic road network.
- Policy needs to make clear that not all employment sites are shown on the proposals map but policy will apply to all sites.
- Newton Poppleford and Harpford Parish Council would prefer to see a combination of residential, retail and employment provision.
- Rather than individual housing estates, retail parks and industrial estates mixed use developments are needed to avoid the necessity for residents to drive to work or shop.
- Economic Development Needs Assessment not available at time of consultation.
- Plan cannot progress until EDNA results integrated with LHNA evidence.

- More clarity is needed on what is meant by “a net increase” and “sufficient new employment floorspace”.
- There is a shortage of sites available for small and medium sized businesses across the district, outside the West End.
- No reference to the needs of the wider sub-region, specifically Exeter nor the impact of ECC’ new Local Plan policies relating to the redevelopment of existing employment sites or the lack of reliance on greenfield allocations for residential, employment and mixed-use development. More emphasis needs to be given to the needs of the sub-region as opposed to East Devon as a single entity.
- Fundamentally disagree with a strict adherence to the ‘predict and provide’ model, support an alternative explicitly pro-growth strategy designed to work from the bottom up to allocate a wide range of suitable and sustainably located employment land
- Support existing employment areas as the primary location for new employment, Greendale Business Park is a perfect example of an existing employment area which is in a highly sought-after location and capable of expansion within environmental limits.
- Object to concentration of jobs in tier 1-4 settlements- increasing the number of jobs at a settlement does not necessarily mean that more residents of the settlement will work in that employment. There is a risk that such a strategy will in fact be counter-productive, spreading a number of jobs to settlements which then attract employees to travel at great distance often by private car- better to expand existing employment sites in the west end eg Greendale Barton
- 3West Developments Ltd supports the draft Plan's aspiration to provide the right land and premises in the right location. However, the company objects to the mismatch between this aspiration and the lack of an evidence base for the Economic Strategy. The company believes that the strategy should not proceed until the evidence base is complete.

Policy 5 - Mixed use developments incorporating housing, employment and community facilities

- Strategic Policy 5 of the plan seeks to accommodate and support mixed use development through securing employment and social/community facilities on qualifying residential development sites, size thresholds are defined in plan policy. A number of comments were received against this policy with key issues raised highlighted below.
- Devon County Council support mixed use development sites to reduce the need to travel, with delivery in parallel to reduce travel from the outset.
- Clyst Honiton Parish Council is concerned that the policy of mixed development could be abused by developers. They believe that the plan should be clear about what type of

employment is desired and where it should go. They are also concerned that developer profit could take precedence over what is right. The policy of mixed development is good in principle, but it can be difficult to enforce.

- Views were expressed that it is positive to secure facilities alongside housing.
- It was suggested thresholds were set too high and concern that schemes will come in, by design, to fall below thresholds. There was also a question raised around the justification for the specific thresholds.
- There was a view that the policy approach is not practical for smaller sites at villages – with one respondent advocating provision of green space instead.
- Clarity what sought over what ‘exceptional’ reference in policy means? There was also a call for clarity over what “off-site” means.
- Poundbury was cited as a positive example where employment is accommodated alongside housing.
- Concern was expressed that there will be no match between people living in the houses and jobs secured.
- Concern was raised about bad neighbour employment uses resulting with heavy traffic on unsuitable roads, noise, risk of industrial accidents, pollution and nuisance.
- Policy was considered flawed as it does not address the issue of jobs needed in any given location and there should be more work on looking at spatial needs and demands for employment space.
- A response highlighted that any jobs created should serve local needs and there was a call for examples of the types of jobs that may result. There were responses that did not opposing policy but highlighting concerns around inappropriate uses therefore seeking clarity on job types to be allowed.
- There was a view that it would not be practical on many sites, could leave to viability concerns and the appropriate approach is to seek to locate homes close to where jobs are located.
- It was highlighted that with home working many houses accommodate employment now already – this was flagged as a reason for not supporting policy.
- There should be further policy (or expansion of this policy) to cover vibrant regeneration of towns and town centres to provide mixed uses in close proximity.
- Para 3.73 “This ratio is the same as 0.4 hectares for 10 jobs and 0.1 hectares for 25 jobs.” Presumably a typo: should be 100 jobs not 10.
- Concern was expressed that policy will lead to more development and loss of green fields.
- Policy should support and allow for a diversity of jobs (not just IT based).
- National Highways endorse mixed-use development and assume transport evidence will be prepared to show the potential impact of allocations on the local road network and the strategic road network.

- Whilst it is appreciated that the intention of the policy is to secure sustainable patterns of development with more mixed use developments, its current approach is too rigid in its application. There appears to be no rationale for changing the approach in adopted local plan.
- To identify the amount and type of employment land needed, build upon the existing evidence, monitoring the effectiveness of the adopted policy, and provide up to date evidence of employment need. The most recently available Employment Land Review for the year ending 31 March 2021 was published in Spring 2022. It indicates that 103.45 ha of employment land is currently available, based on the ratio of 1ha for each 250 homes embedded in the adopted policy, sufficient employment land is currently available for more than 25,750 homes.
- EDNA should consider surplus employment land before establishing requirements for the new plan period under Policy 4. As currently worded, Policy 5 is reliant on all residential developments to provide a proportion of employment land, with a preference of that provision being on site to form mixed uses. The draft policy represents a 'scattergun approach' to employment provision, especially as it applies to all residential development with a threshold of 25 homes.
- Objective to balance housing growth with employment is supported but policy is arbitrary and may be a disincentive to housing developers, as well as not delivering the type of employment that is actually needed. It would be better to allow rural employment schemes to come forward independently where there is evidence of need.
- This policy implies that sustainable patterns of development are only achievable through the development of mixed use schemes, providing both employment, housing and on-site social/community facilities. This premise does not accord with the NPPF and cannot therefore be considered sound.
- There is no up-to-date evidence to support the requirement for 0.4ha per 100 dwellings so the policy is not justified and therefore unsound.
- There was concern that employment provision will not be delivered and would become extra housing development.
- Agents for Bloor Homes raise concerns about the policy that they summarise as - Overall, it is considered that the Council needs to apply a more discerning and considered approach to allocating housing and employment land. As drafted, the policy is unclear and unjustified, with requirements that could prevent deliverable housing sites coming forward. This is of particular concern when there is a national housing crisis, and the Council needs to ensure sufficient homes can be delivered to meet the LHN requirement.
- A site promoter criticises the use of thresholds on residential led sites that will either prevent site delivery or reduce affordable housing provision due to the cost of providing employment where there is weak demand. If there are specific sites that perform well in

terms of both residential and employment use criteria, then they should be specifically allocated as mixed-use sites.

- For clients Greenslade Taylor Hunt consider that it is not appropriate that employment land should be provided at a set ratio in relation to housing development, or that residential developments should provide financial contributions to the delivery of employment premises elsewhere. Linking residential development with employment provision in this way will discourage residential development as it undermines scheme viability. They favour employment site allocations.
- Barratt David Wilson Homes wants the policy to be more flexible and have better regard for existing and underutilised employment land. No rationale for changing the approach in the adopted policy (latter is more consistent with Government policy)
- Without EDNA alternative sites can't be assessed
- Without EDNA it isn't known whether sufficient sites are available to meet need, further sites should be allocated
- The mechanism for determining the number of off-site contributions needs to be detailed. The impact on viability of developments also needs to be considered here, and priorities for contributions where they can render developments unviable also needs consideration.
- Place Land objects to Strategic Policy 5, which requires tier 3 and 4 settlements to provide mixed-use sites with 0.1 hectares of employment land for every 25 dwellings. That is too low to yield a genuinely mixed-use site and will result in vacant, undeveloped land. Place Land recommends that the policy be amended to remove the requirement for mixed-use sites and rely on Strategic Policy 26 to identify the most appropriate locations for employment development.
- 3West Developments Ltd recommends that Strategic Policy 5 be amended to remove the requirement for Tier 3 and 4 settlements to provide mixed use sites. The company believes that Strategic Policy 26 should be used to identify the most appropriate locations for employment development in these settlements.

Policy 6 - Development inside Settlement Boundaries

This policy supports development inside settlement boundaries in principle, subject to other local plan policies and neighbourhood plan policies. It makes it clear that significant boundary changes should not be made in neighbourhood plans.

There were some representations in favour of the policy, with comments including:

- Sympathetic growth on outskirts is acceptable.

- Sensible pragmatic approach, but development should not happen on amenity land unless compensated for nearby a proper investment made in infrastructure.
- Settlement boundaries should be updated to ensure they are logical and robust.
- Support in principle.
- Sound approach.
- Good policy but would support some development outside boundaries too for younger or older local people to avoid long commutes.
- Good policy in theory but need to control developments not in interests of local people.
- Should use acceptable boundaries to prevent sprawl and coalescence.

There were also criticisms of the policy including the following comments:

- Not happy that peoples back gardens that were outside the BUAB are now within the new Settlement Boundaries and will have a presumption that development will be allowed, and I think this will cause gardens to be 'filled' in creating congestion in villages where previously there was greenery.
- The proposed Settlement Boundary change around Bystock Village does not result in any increase in housing Supply (HELAA Methodology) in the Emerging Local Plan. Given that there is no increase in supply there should be a compelling policy reason to move the existing boundary. No such imperative exists; indeed the proposal creates a direct policy conflict between the Local Plan and Neighbourhood Plan. There is no point in creating policy conflict without planning gain and thus the proposal should be dropped.
- The proposed Settlement Boundary change around Bystock Village creates an explicit Policy conflict between the Emerging Local Plan and the made Exmouth Neighbourhood Plan (ENP Strategy EN1). The inclusion of Bystock Village within the Settlement Boundary would result in the Emerging Local Plan allowing development in an area where the ENP specifically opposes development. This is contrary to the EDDC methodology on defining Settlement Boundaries published in April 2022. Refusing development in Bystock Village is a position recently supported by both EDDC and the Planning Inspectorate.
- No adjustments should be made to allow development.
- No more building – protect private land and green fields.
- Excess development will impact on services and infrastructure.
- No boundaries should be changed to allow development – just allows building on land that would otherwise be protected.
- Green spaces like Littleham Valley should be protected.
- 'Second best' sites in Whimble should not be included in settlement boundary.

- Should not simplify process for developers at expense of consulting and considering local communities on planning applications.
- Separation between Whimble and Cranbrook needs to be maintained.
- Settlement boundaries should be updated to ensure they are logical and robust.
- Removes green space and bio-diversity from within settlement boundaries.
- Not in favour of extending boundaries of already large towns.
- Not acceptable.
- Boundary makes no sense – services have been measured inaccurately.
- Enables a developer free for all.
- Need to define 'modest adjustments' to prevent village distinctiveness.
- Wrong to include a policy that is diametrically opposed to all the others.
- Several respondents commented that there is insufficient infrastructure for new development.
- No alternative to this policy, but it fails due to officers and committee being inconsistent.
- Disregards neighbourhood plan that was voted for.
- Unhappy with whole idea and will spoil East Devon.
- Meaningless bureaucracy that is confusing and can be changed at any time.
- Policy inconsistent with NPPF and unsound.
- Concern about loss of beauty and communities.
- Settlement boundaries out-of-date and decisions should be made on criteria relating to access to jobs, design and other matters, similar to South Somerset policy.
- Settlement boundaries not flexible enough to adapt to community needs and aspirations over lifetime of plan.
- Settlement boundaries can erode character of settlement.
- Policy is unclear or unnecessary – difficult to comment without clarity on potential impact.
- Some concern that wording of policy would allow too much variation.
- Many respondents felt that neighbourhood plans should not be disregarded.
- Deviations to the plan should be debated to avoid fraud.
- Several respondents were confused about the boundary and the relationship with neighbourhood plans and felt that boundaries should not be drawn by EDDC.
- Some respondents found it difficult to comment because they did not want to see outward expansion of settlements or building on green spaces within settlements.
- Support for high density development.
- Several respondents wished to encourage brownfield redevelopment.
- Building outside settlement boundary should be last choice and for local residents only.
- Policy is wrong because encourages urbanisation of small villages with limited infrastructure. Recent development in Clyst St. George has increased light pollution because occupants of modern estates expect street lighting.

- Existing boundaries should be retained and accept that substantial development will happen beyond them that will result in them being redrawn.
- Need a green belt to stop building creep.
- Doesn't make sense to define boundaries and then say they can't be relied on.
- National Highways support the principle of development within settlement boundaries to minimise the need to travel, minimise journey lengths, encourage sustainable travel, and promote accessibility for all.
- Developer is concerned that policy restricts Neighbourhood Plans from allocating sites outside the settlement boundary.

Broadclyst

- Increasing boundary by 50% will change character of village.

Chardstock

- No settlement boundary in Chardstock Neighbourhood Plan due to lack of suitable infrastructure for additional development – Inspector's decision should be considered.

Clyst Honiton Parish Council

- Clyst Honiton Parish Council agrees with the principle of the policy, but is concerned that it is being used to convert commercial land to housing, which is not in line with the Neighbourhood Plan.

East Budleigh

- East Budleigh with Bicton Parish Council request a higher definition map and the policy wording 'having regard' replaced with 'subject to'. The Parish Council request amendments to the settlement boundary and very helpfully show these on a map.
- Changing boundary to include some outlying properties makes sense.
- Settlement boundary should not include Temple Hill House because it is a listed building separated from the main core of the village by an open space. There is no footway along Yettington Road, significant height differences and highway safety issues.
- Whole of property within current boundary but proposed cuts garage in two.

- Support for extending settlement boundary to the northwest and south as clear continuation of built form and highly accessible, but request that extension also includes residential curtilage of 'Ashfield' to the northeast.

Exmouth

- Exmouth Town Council agree.
- Current boundary should be kept as to build outside would be detrimental to AONB, local community and tourism.
- Proposed boundaries are not sound or legally compliant because they do not follow national guidance and contradict the neighbourhood plan.
- Changes to the boundary around Bystock Village conflict with the methodology- B2 and B3, as they include areas specifically protected by a made NP and areas where the buildings are not well related to the built form of the settlement- and do not add to the land supply

Feniton

- Development at Burlands would be beneficial.
- Hawkchurch
- Boundary change would allow inappropriate development and a large industrial site.
- Allocation includes village shop which is run by volunteers. This would be lost.

Lympstone

- Boundary too large.

Newton Poppleford

- Newton Poppleford and Harpford Parish Council do not support proposed changes to the settlement boundary for Newton Poppleford because they do not feel that it has been consulted on and has not been democratically approved. The Parish Council consider the additional areas included to be generally unsuitable for development because they are in the floodplain, AONB or good agricultural land.
- Concern that including areas to east of Back Lane would encourage inappropriate development in the AONB.
- Concern about the expanded settlement boundary and impact on flooding, ecology, agricultural land and views.

West Hill

- West Hill Parish Council objects as changes do not comply with the methodology, the boundary is significantly different to the Villages Plan with no rationale for these changes – specific examples are given in their consultation response.
- Some developers suggest the southern part of West Hill, south of the proposed settlement boundary, has a built-up character comparable to areas inside so the area up to Oak Road should be included in the settlement boundary – see SPC 08.02.22 resolution to draw boundaries more loosely.
- The hilly nature and lack of pavement and street lighting in West Hill mean that the settlement boundary should be reduced and revert back to the Villages Plan BUAB.
- Concern about lack of community consultation and that boundary extended to unsustainable areas

Honiton

- Concern about development towards Gittisham and impact on Honiton high street.
- Gittisham Parish Council objects to the extension of the Honiton BUAB to include this proposed allocation. The council believes that it is inappropriate and irresponsible to show a settlement boundary at this time, when it is acknowledged that only a small proportion of the area may be required (if at all).

Policy 7 - Development outside Settlement Boundaries

This policy restricts development outside of the defined boundaries except in certain circumstances.

A number of respondents thought the policy made sense and generally agreed with it, with comments including:

- Newton Poppleford and Harpford Parish Council agrees with the outcome of the HELAA process as it relates to this parish and is encouraged by references to the importance of Neighbourhood Plans.
- The East Devon AONB Team support the limitation on development and the reference to not harming the distinctive landscape, amenity and environmental qualities.
- Devon Wildlife Trust that this policy should be strengthened by the inclusion of an additional sentence stating ‘Development beyond Settlement Boundaries must deliver a minimum 25% biodiversity net gain.

- Clyst Honiton Parish Council agreed with the policy, but believes that it should be revised to require reference to Exception Sites, in order to avoid potential conflicts between policies.
- Totally agree with policy wording.
- Development should be kept within settlement boundaries.
- Support as long as boundaries not redrawn without public consultation.
- Policy good if developers not allowed to override it.
- Policy is good but must be enforced – too much unauthorised development in East Devon countryside.
- Exmouth Town Council agree with policy.

There were some more negative comments including:

- Some development adjoining settlement boundaries may be appropriate.
- Policy too vague – development should not be allowed unless explicitly mandated by local people.
- Unsound and inconsistent with national policy.
- Policy unjustified when considered against reasonable alternatives.
- Criteria based policy should be used not settlement boundaries.
- Too subjective.
- A site promoter suggests a more flexible approach in the west of the District particularly around the defined settlement boundaries.
- Greenslade Taylor Hunt, for clients, states - settlement boundaries are an outdated and unhelpful mechanism by which to judge the sustainability credentials of a development proposal. The emphasis should not be on whether a proposed development is positioned on the correct side of an arbitrary line, as this approach simply prevents any genuine consideration of whether it does (or does not) represent a sustainable form of development.

Other comments included:

- Policy should encourage green development, solar panels, rainwater harvesting, eco-friendly sewage treatment plants if not possible to connect to main drains.
- Policy should allow small-scale development outside settlement boundaries to provide opportunities for housing delivery on smaller sites.
- Development beyond settlement boundaries needs to be restricted or not allowed and should be in accordance with neighbourhood plan.
- Development outside of the allocated area would impede traffic flow on single track lanes and compromise the compact nature of the settlement.

- Development beyond settlement boundaries will harm distinctive landscape and environment.
- Keep tight policy wording to stop urban sprawl.
- Policy states that Council will ignore settlement boundaries when they wish.
- Contradiction in policy as development inevitably harms the landscape.
- Sites outside existing settlement boundaries should not be allocated, especially if contrary to neighbourhood plan.
- Whimple Parish Council repeat comments made on Policy 6.
- Landscape, amenity and environmental quality must have highest protection.
- Growth should be allowed outside boundaries as only alternative is to increase density and housing growth must be expected for next 80 years – not reasonable for this to be accommodated in 20 century boundaries.
- Give priority to imaginative developments at higher density to avoid urban sprawl.
- Moderate development necessary on edge of villages as existing boundaries need no space for further housing.
- Development outside boundary should be very exceptional and have local support.
- Greenfield development outside of settlement boundaries should only be considered once all sites within it have been fully utilised.
- Do not agree if way of justifying a new town.
- Don't want uncontrolled rural development but should allow opportunities to grow naturally.
- Not true – distinctive landscape character of Farringdon would be harmed.
- Query whether includes floodplain.
- Suggest rewording so development only allowed if 'explicitly' in local or neighbourhood plan.
- Policy incompatible with plans.
- A couple of respondents thought that Farringdon plan had disregarded.
- Communities have their own identities and any change should be determined by them.
- Neighbourhood Plans have been ignored in some places.
- The Sid Vale Association support no development beyond the settlement boundary but consider 'will not generally be supported' to be too vague and that absolutely no development should be allowed because it would be detrimental to the AONB.
- A few representors considered that the policy should be more flexible to allow small scale sites on previously developed land or where they are sustainable but too small to consider for allocation. Alternatively, settlement boundaries should be defined more loosely to allow smaller sites to come forward.
- Not all sites outside of settlement boundaries should be treated the same because a site near a village close to Exeter could be more sustainable than one inside a settlement boundary in a more remote village.

- Building on farmland is unacceptable for many reasons.
- Randon sprawl outside of settlements should not be encouraged.
- Too much development would harm rural nature of village.
- Why is the plan ignoring this policy by proposing development?
- Public transport has not been taken into account and schools and health provision cannot cope with existing unfinished new town.
- Some existing rural buildings should be used to support young agricultural people
- Don't want to lose green spaces.
- Why aren't all areas equal? Should consider everything except where an AONB will be affected.
- Boundaries should be drawn in consultation with parish councils and local knowledge respected if proposals to break them.
- You don't listen to the people – no to the destruction of Devon.
- Second choice sites outside boundary should not be supported?
- Boundaries important as long as sufficient supply within them.
- Policy should extend to small market towns.
- Brownfield first.
- Developers will find ways around this policy.
- Villages should be kept as villages.
- Stick to agreed neighbourhood plans
- Policy contradicts new settlement proposals.
- Any development should take account of availability of services.
- Villages have always provided local services.
- Proposed developments at Exmouth all outside the Built-up Area Boundary.
- Proposed sites in Broadclyst are beyond settlement boundaries.
- Support the strategy, which would preclude significant development in the Sid Valley.
- Pottery should not be classed as 'countryside'.
- Appropriate and sensitive development must not be stifled by overly restrictive policies that do not allow for windfall development.

Chapter 3 – Policy omissions from - Spatial strategy chapter

- In respect of Chapter 3 the matters listed below were highlighted in representations as policy omissions from the plan and matters that should be covered by plan policy.
- There should be further policy to cover vibrant regeneration of towns and town centres to provide mixed uses in close proximity.
- The obvious predicament of town centres needs to be addressed head-on. Each town centre should have an individually tailored set of proposals (or Masterplan) to take

them through the Plan period. This should have happened years ago, as is pretty much standard practice in other authorities. These individual town plans should comprise a mix of specific proposals and general policies pertaining to that town and should be core sections within an East Devon Local Plan, as they are everywhere else.

- There should be a policy requiring the cumulative impact of proposed developments on key local infrastructure to be considered (Woodbury Parish Council).
- Devon Wildlife Trust advise that the Local Plan should include a strategic policy on environment. Environment is one of the three main themes of the Local Plan and the omission of a strategic policy on this theme is at odds with the thrust of the stated aims of EDDC. They also advise that it is essential that the County Ecologist, or person with similar knowledge and skills, comment on the entirety of this document to ensure that the importance of nature is woven into every section. This is required to ensure that the vision for a 'Greener East Devon' becomes a reality. A 'nature everywhere' approach should be reflected within every policy.
- Devon Wildlife Trust consider that Strategic Policies 3, 4 and 5 are missing reference to the environment. The benefits that nature brings to health and wellbeing are well recognised and specific targets should be included within these policies to ensure that these benefits are realised within every development.
- Agents for Bourne Leisure consider that given the importance of Devon Cliffs Holiday Park to the East Devon visitor economy, and its size relative to a number of settlements in the district, there is a real opportunity with the emerging plan for the East Devon District Council to proactively ensure the future of the holiday park is protected so that visitors keep on returning to East Devon while providing Haven with a positive and clear framework for investment. Such a framework would sensibly include Devon Cliffs being given its own designated boundary and specific policy within the Plan and its proposals map.
- The Circular Economy, also included in the Vision Group for Sidmouth submission of March 2021, is being adopted with enthusiasm by other authorities, but the emerging East Devon Local Plan fails to provide any mention this key idea, which would help to advance the net-zero-carbon economy promoted in the plan.

Chapter 4 - Addressing housing needs and identifying sites for development

Chapter 4 of the draft plan was about the process used to assess sites or land areas for potential inclusion as proposed allocations in the local plan, as such it is not a chapter that would or will feature in the Publication draft of the plan, but it does inform on how we get to a Publication draft. There were several comments made that related to the process used and applied.

- Objection to 2nd best sites being allocated for development.
- Concern raised that some ruled out sites have the same characteristics, were not markedly different from some 2nd best and preferred sites.
- Objection that impacts on nearby residents (from development) are not factored into site assessment work.
- Infrastructure capacity, including road capacity in rural areas, not properly considered in the assessment work.
- Concern that logical reasoning has not been followed through in making site selections.
- The Blackdown Hills AONB partnership suggest potential allocations within or adjacent AONBs should be justified through an LVIA or landscape assessment plus the preparation of Design Codes to accompany any allocation/development proposal.
- Concern that sites assessed have been determined by land put forward by landowners, owners whereas the onus should firstly have been on assessing where, in principle, development should go and then landowners should be approached.
- It was suggested that the plan is inappropriately 'developer led'.
- It was suggested that more rigorous criteria, based around principles for where development should go, for site assessment should be established
- The view was expressed that previous SHLAA submissions sites should have been taken into the assessment process and not all landowners were aware of the need to resubmit sites.
- Such matters as the amount of waste / graffiti / fly tipping that will result from new developments should factor in assessment.
- Objection that the HELAA process has not involved direct input from communities.
- Some support expressed for directing development to Tier 1 and 2 settlements.
- It was asserted that assessment does not consider flood risk.
- Historic planning decisions should be considered in site assessment.
- But a respondent did comment "We have a considerable shortfall in housing, and although not always ideal, development is important for future growth. Main towns will be severely restricted over the next 20 years if suitable development is not planned for. We need to bring wealth into our area to help support our local economy otherwise East Devon will struggle to flourish."
- Devon County Council provide some overarching flood risk allocation comments in relation to flood zones 1 – 3 and surface water flooding.
- Objection that Upottery should be designated as a Tier 4 Service Village, and that Land at Manor Green should be allocated for housing development.
- Infrastructure provision and capacity should feature in site assessment work.

Chapter 5 - Future growth and development on the western side of East Devon

Chapter 5 of the plan addresses the western side of the district, close to Exeter, and the significant development proposals in the draft plan for this area. There were many responses to the plan that were opposed, in general, to the overall scale of growth for the western side of the district but also there were responses that endorsed the broad strategic approach. These overarching comments are highlighted in feedback on plan strategy, as well as being touched on in this section of the report. This section, however, majors on comments that relate to specific proposal and policies for the western side of East Devon. Generic matters, not related to specific polices, are set out below.

- The East Devon AONB team support the concentration of development in the West End, outside the AONBs, but stress that consideration should be given to how visible new development might be when constructed in the views into and out of the AONB and to what extent it might impact on the setting and habitats of that part of the AONB.
- Clarification is requested as to the relationship between the housing numbers for a new town and Cranbrook and how these might affect the prioritisation of housing sites identified around the towns and villages across the AONB to meet the required targets.

Policy 8 - Development of a second new town east of Exeter

General issues in respect of development of a 2nd new town

- The Environment Agency note that the development of a second new town east of Exeter will result in a significant number of new homes in the Clyst catchment, where every waterbody is failing to meet good ecological status due to the high level of nutrients. The plan needs to demonstrate that further development will not lead to further deterioration and should seek improvements.
- The Environment Agency state that the proposed new town will need to be the subject of a Strategic Flood Risk Assessment Level 2 to better understand the flood risks and how the new town could protect and enhance the floodplains. The provision of at least 254 hectares of land for green infrastructure is therefore welcomed subject to the floodplain corridors being an intrinsic part of the green infrastructure and the inclusion of natural flood management, ecological enhancement and biodiversity net gains: they (the floodplains) should not be viewed as corridor to improve sustainable transport links.
- South West Water provide figures that suggest that the development mix would result in a requirement for 504 Megalitres of water a day by 2040 (based on current average

consumption rates). This will have a significant impact on water resources and infrastructure so the policy should explicitly state the requirement for water use minimisation in accordance with Objective 2 of the plan.

- Devon County Council (DCC) question if a new community is the best way forward given more working at home which reduces the need to travel, significant upfront costs, high trip rates until facilities are delivered – a better option is to expand existing towns.
- DCC support the early delivery of its town centre but question whether this is deliverable given delays to Cranbrook’s town centre.
- DCC state road improvements are mentioned but nothing about sustainable transport improvements which should be considered first and are more important.
- DCC are not clear how on infrastructure delivery and how large up-front infrastructure costs will be funded.
- DCC consider that 15 gypsy and traveller pitches up to 2040 is insufficient – 30 pitches across 2-3 sites would be more appropriate, and a further 30 pitches across 2-3 sites post-2040.
- DCC state the majority of employment provision will be of strategic scale which should be located close to existing main transport corridors. The volume of logistics and scale of buildings should have defined limits.
- DCC welcome the allocation of land for education infrastructure which should support primary, secondary, special and post-16 provision; likely to require most of the 23 ha identified.
- DCC note there are a number of watercourses mapped and unmapped which need to be considered to ensure a viable whole site drainage strategy.
- Disregards the changes to Government policy which mean housing numbers are no longer mandatory.
- Exeter City Council stress the importance, in respect of new town policy and implementation, of cross-boundary working to ensure consistence of approach around infrastructure planning to include transportation, education, health, community and utilities and habitat mitigation.
- Exeter City Council advise any new settlement needs will need to employ innovative forms of planning and delivery to achieve net zero. There are many challenges in delivering a new settlement fit for the future and we look forward to working in close partnership to try to address these challenges.
- Exeter City Council advise off-site transportation and infrastructure may be required within the city to help mitigate development impact. If this is the case, appropriate and proportionate developer contributions either through s106 or CIL will be required from developments located in East Devon. Ongoing and comprehensive cross boundary infrastructure planning is essential to ensure that development impact is mitigated appropriately.

- Natural England advise the infrastructure provision for a second new town (point 6. Infrastructure) should specifically require the identification of Suitable Alternative Natural Greenspace (SANGs) based on a minimum of 8ha per 1000 population. All options drain via Grindle Brook to the River Clyst and then reaching the Exe Estuary posing a pathway for impacts on water quality. Measures to manage flood risk will be needed and SuDs should be required by policy. Options for allocations should avoid loss of “best and most versatile agricultural land” as advised in the NPPF paragraph 174. Higher quality land is present in all options. Your evidence base should include all available soil data to appraise options for a new settlement.
- Devon Wildlife Trust welcome the commitment to deliver a minimum of 254 hectares of land for green infrastructure provision as part of the new town. However, a greater level of detail is required within this policy to ensure that high quality nature-rich infrastructure is delivered. In representation they set out more detail on provision they would wish to see.
- National Grid state that Options 2 and 3 are traversed by NGED’s Exeter Main 132kV line, a strategically important electricity supply line within East Devon. This infrastructure serves thousands of residents and businesses in the Exeter area and is critical to maintaining supply in the short, medium and long-term. Any proposals to divert or underground this line would be highly challenging and disruptive to supply and NGED would object to development proposals which are reliant upon such works. NGED’s preference is for the overhead line to remain in situ and any proposals for a new settlement to be designed around them. The retention of the strategically important Exeter Main SGP and distribution station is critical to maintaining the city’s electricity supply and cannot be prejudiced by development proposals which would themselves place a significant additional burden on the electricity supply. Moreover, it is not always possible to divert 132kV lines and if a diversion were possible, it would need to accommodate two larger terminal towers and a 10m wide corridor above the undergrounded cables, which would be required to remain open land. Such land is unsuitable for buildings, public highway and any other development which would obstruct access to the cables. Early consideration of the overhead lines in the masterplanning process can enable the lines to be sensitively and efficiently designed into the development.
- Sidmouth Arboretum -
 - - Section 4 on the town centre would be strengthened if there was a specific mention of the beneficial effect of and a numerical target for canopy cover. If the target canopy cover was included, then some pre-emptive planting could begin as soon as the layout of the town centre was known. There would then be trees of a reasonable size on site when the first phases were ready for occupation.
 - - Section 6 on infrastructure mentions 254Ha of land for Green Infrastructure (GI) and this appears to be only the metaphorical greenness. This section would be

strengthened if it included a commitment to maintaining and increasing the population of mature trees and hedgerows as living infrastructure. Perhaps you could emulate the Master Plan devised for Milton Keynes as far back as which decreed it should be defined as the 'city of trees' with another explicit commitment to a percentage of canopy cover.

- Cranbrook Town Council agrees with the need to deliver a substantial percentage of housing through a new settlement, but believes that the plan does not address the strategic infrastructure needs that will be required to underpin this. Cranbrook TC is concerned about the lack of transport connectivity in the area and believes that the plan does not provide a clear vision for how the additional demands on infrastructure will be met. For example, the highway infrastructure in that part of East Devon is already at or near capacity with lengthy delays at peak times. Existing public transport in that area is not a viable alternative to the car and that needs to be addressed. They also believe that the plan does not learn from the lessons of the development of Cranbrook, particularly in terms of the management of public amenities. For example, one of the very big errors in Cranbrook was attempting to manage public amenities through an estate rent charge and management company. This approach was grossly expensive to residents and provided a very poor service to the community.
- A group of local residents query the need for a second new town (especially in the absence of the latest Census and lack of long term data re working from home patterns) and the impact this will have on Cranbrook. They query whether alternative approaches, for example incremental expansion of existing settlements, have been properly considered and whether proposals for the new town are premature
- A group of local residents are concerned at the negative impact further development will have on the perception of East Devon from a tourism and quality of life perspective
- Clyst Honiton Parish Council supports the principle of a new town in their area, but believes that the provision of 2,500 homes within the proposed plan period is optimistic. They believe that planners should get ahead of the curve and not let developers determine what is provided when. The council would like to contribute to the production of a masterplan for the overall site, which should include principles such as using Garden Town principles, maximising green space, and using wind and solar power. They believe that these principles would help to create a sustainable and thriving new community.
- New build housing pushes existing house prices up making homes unaffordable.
- Oppose all three options – this option was missing from the consultation.
- Not enough emphasis is being placed on brownfield sites.
- Site assessment is based on eleven categories that are so broad in their definition that any scoring can only be on a subjective basis, which is not a sound basis for judging the preference of one site over another.

- Points raised in mitigation are very subjective and can well be argued either way, the Council has made its decision on preference and simply seeks to justify it.
- Make the new settlement bigger.
- Focussing development close to Exeter is sensible to avoid swamping existing settlements or developing in AONB.
- The A3052 and M5 Junctions 29 and 30 are often at capacity already, without adding 8,000 new homes, particularly when existing park and ride facilities are all on the Exeter side.
- Traffic would be so bad that it would be impossible to use Westpoint as a showground if one of these options was developed.
- No mention of Service Road which will impact on existing residences, traffic planning, emergency services.
- WSPs traffic modelling report is totally inaccurate – plans for 2030 not 2040, does not consider construction traffic, mitigation measures have not been subject to detailed modelling.
- Active travel links to Exeter and train stations will be easier for large scale development in this area.
- Cycle routes into Exeter are inadequate, there is no detail on how this will be overcome.
- Cumulative transport impacts need to be recognised from the start and ensure delivery of a proper strategic transport plan.
- None of the options have a railway line meaning other forms of transport will be used.
- Have not taken the impact of construction traffic into account.
- The areas are prone to flooding.
- Biodiversity and habitats that form part of a wider ecological network will be adversely affected.
- Existing country lanes in the area will become rat runs.
- A new settlement will ruin the rural city character of Exeter.
- Will be a dormitory town serving Exeter, having to wait many years for facilities.
- Current healthcare facilities including GPs, dentists, ambulances, and hospital services are struggling, so a new town would add too much strain.
- Pinhoe and Broadclyst medical practice comment that health provision at Cranbrook has been inadequate and need to learn from these mistakes – primary care services need funding for greater capacity before further housebuilding in the West End of East Devon.
- Need to learn lessons from Cranbrook such as need for clear masterplan, high quality design, and prioritising infrastructure and facilities over housing.
- Would rather see organic growth of existing settlements than new towns to better retain the character of the area.
- No reference is made to dealing with wastewater, South West Water already pumps sewage into the sea.

- Increase the number of homes at the new settlement within the plan period to 5,000 to remove the need for second choice sites and several preferred sites in unsuitable locations.
- There is no justification for the new gypsy and traveller pitches as lack of evidence on need.
- Focus on delivering green infrastructure to connect green areas throughout the site.
- Spread development to existing settlements rather than create a new settlement – this will enable faster build-out as infrastructure already exists, provide access to existing services, and will increase vitality of existing town centres.
- Much better to have a carefully planned new town rather than continually expanding existing settlements which already have overstretched infrastructure.
- Infrastructure is likely to come far behind housing, based on recent experience at Tithebarn, Cranbrook and Pinhoe – need facilities early on to establish patterns of behaviour.
- Location next to major roads will not help reduce car usage.
- Need to provide education.
- Need to provide religious opportunities.
- Provide jobs near to where people live to minimise the number of cars on the road.
- Why are all three options located so closely to each other, there must be other options in East Devon.
- The recently adopted Farringdon Neighbourhood Plan voted for by 88% of residents is being completely disregarded, which is undemocratic.
- Farringdon should not be obliterated by a new town.
- New town will cause light pollution in a rural area with dark skies.
- The destruction of agricultural land will threaten food security.
- The reduction in working age population in more than half of wards in East Devon mean that development does not need to be located close to jobs in Exeter.
- The Enterprise Zone can be supported by future planned development at Cranbrook rather than needing a new town.
- Need a stronger commitment to joint working with Exeter given that residents will use facilities in Exeter.
- Exeter and Devon Airport Ltd consider that the impact of proposed development upon Exeter Airport has not been properly assessed, which is a significant future risk of conflict.
- Include eco-tourist facilities with holiday rentals to encourage tourism.
- The options have been developed based on land made available by landowners, and is a policy led by landowners and developers.
- Policy content on energy efficiency, design quality and access to facilities is vague.

- Need lots of investment in public transport otherwise there will be far more cars on the road.
- There should be a focus on high quality homes that are built to last.
- There is potential for a small new village based around the Greendale facility, provided a new roundabout is built on the A3052.
- Use mass timber construction to reduce use of concrete/steel to reduce carbon footprint.
- Leave Farringdon as it is with a community, open countryside and wildlife rather than prioritising landowners and developers.
- New town options being discussed at same time of Farringdon Neighbourhood Plan so developers interests preferred and very close to Cranbrook.
- A number of respondents felt that neighbourhood plans had been disregarded.
- There was some support for a new town to avoid additional crowded housing estates in existing settlements.
- Traffic problems along A3052, A376 and M5 with no good bus or train links.
- Will harm distinctive landscape.
- Farringdon is established community with distinctive character over 1,000 years which should be maintained.
- Historic England note that all 3 options would have an effect on the significance of certain designated heritage assets, and the envisaged level of change will no doubt considerably alter their wider setting and one's experience of the rural landscape. They recognise the Council's view that with further assessment and master planning, there is scope to minimise that impact, and to take the opportunity where appropriate to improve matters. They welcome further information/evidence during the preparation of this Plan.
- Historic England also anticipate that the Plan will include, within the policy, key design principles to ensure development positively responds to historic landscape character, heritage assets and their settings.
- National Highways state that all new town options are likely to be heavily reliant on the A30 and A3052, and therefore could result in an impact on the operation of M5 Junctions 29 and 30 – need evidence to demonstrate how the new town can be delivered up to the year 2040 and beyond to its full extent.
- National Highways state there are limitations in the new settlement Highways Impact Modelling Report, namely it only considers 2,500 dwellings not the full 8,000; no additional local plan or background beyond existing local plans was included; need to update DCC Greater Exeter Model; modelling uses a forecast year of 2030, rather than 2040.
- Support principle of new town close to Exeter because infrastructure is in place and could provide affordable housing not possible by adding small sites to villages.
- Confusing that the terms new community/town/settlement are used interchangeably throughout the plan – prefer the term new community.

- New community should advocate high quality design based on Garden Design principles from the outset.
- Direct development to Cranbrook as already has infrastructure, direct road and rail links, utilities.
- Insufficient land has been made available for SANGS and BNG.
- Object as lack of transparency an intended new road was not shown on plans.
- 140 comments were received by the Council through a third party website: [Greenhayes Garden Village](#). People were invited to indicate why they supported the proposal in a few words, although some did not support and other comments highlighted a need for affordable housing, praised the sustainability potential of a new settlement and felt that it would take the pressure off existing towns and villages.
- Site promoter considers that the number of dwellings that can be delivered in the New Town in the plan period could be higher than 2500
- Housing industry organisation encourages EDDC to engage with the industry to ensure that the concepts proposed are realistic, achievable and viable
- A developer has significant concerns as to whether the new town can deliver 2,500 homes by 2040, so reduce this figure and allow additional sites – specifically, Land at Addlepool Farm for 700 dwellings and other facilities.
- A site promoter suggests that long lead times, particularly considering more restricted access to Government funding than for Cranbrook, mean that those parts of the site that can be released early (Cat Copse 15/1833/MOUT is specified) should be developed as a contribution to the new town and overall housing numbers.
- A site promoter supports the inclusion of land south of the A30 close to the airport for strategic residential development (as part of Denbow) and ‘softer’ related uses (such as BNG and SANGS).
- Prepare a specific plan for the new settlement, like has happened at Cranbrook.
- It is premature to plan for post 2040 as other more sustainable locations could become available after then within the Exeter sub-region.
- An option 4 “none of the above” should have been presented, prefer to see a more dispersed approach to existing settlements including Cranbrook.

Option 1

- Devon County Council (DCC) state if a new community is required, then the preferred option is the least worst from a transport perspective but given the lack of rail service, the proposed new town is likely to have significant impacts on M5 Junctions 29 and 30, other important road junctions (e.g. Clyst St Mary roundabout), and the local road network in and around Exeter – significant highways improvements are likely to be required as well as high quality walking/cycling routes.

- DCC consider that Hill Barton Industrial Estate is strategically significant for waste management and should not be constrained by non-waste development – the proposed new community will be impacted by noise, odour, traffic, dust etc at these waste sites, so parts of Option 1 and Option 2 are not suitable for residential development (as noted in other responses).
- DCC state Options 1 and 2 contain an asphalt plant within Hill Barton Industrial Estate so would object to the introduction of noise/dust sensitive properties in close proximity.
- The landowners of Dymonds Farm, part of Option 1, advise that their land is not available for development.
- Pegasus on behalf of Land Value Alliances submit around 70 hectares of land to the north of Hill Barton Business Park for inclusion in the new settlement. Site could accommodate 1,500-2,000 homes plus infrastructure, facilities and open space.
- Pegasus on behalf of Land Value Alliances note they are currently engaging with other landowners in Option 1 to develop a masterplan for the whole area.
- Pegasus on behalf of Land Value Alliances has prepared technical evidence, part of which shows that Option 1 scores more strongly on landscape and heritage matters than the Council's evidence.
- Turley, on behalf of Bloor Homes and Stuart Partners, favour Option 1 because:
 - Key parts of the proposed 'Denbow' new community are controlled by two main parties who have significant experience in respect of the delivery of strategic scale development;
 - The ability to achieve a comprehensive mixed-use development, including key linkages between the A30 and A3052 represents a distinct and clear benefit for the scheme, and ensuring that it can provide connectivity, and take full advantage of proximity, to the various regionally significant uses and infrastructure in the area;
 - The part of the New Town which is controlled by Bloor Homes and Stuart Partners Ltd can provide the core or 'spine' of the new town and help to ensure that the definition, design and delivery of the scheme is progressed effectively and to a high standard;
 - There are clear ways in which the strategic location of the site can be leveraged to deliver effective strategies for contributing to the beneficial impact on net zero and climate change.
- Turley has submitted a number of reports, technical notes and options appraisals in support of their view.
- Essential infrastructure, such as the spine road, should be delivered early to improve housing delivery rates.
- Policy should facilitate an effective consortium approach to ensure all parties have an equal voice.

- Support Option 1 given its transport connections, access to jobs at the Science Park, Airport, Crealy and Exeter.
- Locating another new town next to the still evolving new town of Cranbrook will mean that all the same infrastructure and facilities will need to be replicated, and the same “selling points” mean that will be aimed at the same market as Cranbrook.
- Finishing Cranbrook should be the priority.
- No train station within walking distance (unlike Cranbrook) and will add extra load on services such as transport, hospitals, and emergency services.
- This option would destroy Farringdon which is a peaceful village set in glorious ancient countryside – the Fiona Fyfe landscape sensitivity assessment refers to its “distinct sense of timelessness” and states high landscape sensitivity.
- The countryside, wildlife and people should be prioritised over developers.
- Do not think that having a single landowner will make a development simpler to deliver, this should not be a factor to consider.
- Object to extending the new settlement east of Farringdon Cross, as it will envelop the existing community.
- Farringdon should be absorbed into Option 1 – we own most of the land around the village but were unaware of the call for sites.
- Do not support a new town, but Option 1 is best as will have less impact on existing communities.
- Option 1 is a ‘dumping ground’ for all housing and employment.
- Support Option 1 as it has best access to major roads.
- Several Grade II listed buildings will be destroyed by this development.
- Options 1 and 2 have a higher visual impact than Option 3.
- Options 2 and 3 will impact badly on what is an attractive area.
- Options 1 and 2 have less infrastructure than Option 3.
- The Otter Valley Association favour option 1 to take the bulk of the District’s housing requirements as access to the strategic road network is better
- Landowner of Waldrons Farm (Farr_02) support Option 1 and state their land (also in Option 2) is available to contribute to a new community – this site can be in the first phase as it fronts directly on to the A3052.
- Support Option 1 as it is gently undulating, and no areas that have serious flood risk.
- Link road between the A30 and A3052 will improve the local road network.
- Support Option 1 as lots of buses already operate in the area.
- Object to Option 1 as it has very little public transport.
- Object as will lose best and most versatile agricultural land for food production.
- Church Commissioners England support Option 1 as good access via the A30, proximity to commercial uses, complement the CVRP, and landscape, heritage, and ecology impacts can be made acceptable.

- Parish will be split in two by new road from A30 to A3052 which will become a rat run.
- Farringdon Residents Association, amongst others, object as contrary to the made Farringdon Neighbourhood Plan which allows for 12 extra dwellings.
- Well sited as potential to extend the district heating network from Hill Barton to Cranbrook.
- Object as roads are already too busy, particularly A3052, at Clyst St Mary and M5 J29 and J30.
- Option 1 only scores fractionally higher than Option 3 due to deliverability, so it is a landowner/developer led plan rather than for local people and will end being controlled by a developer consortium like Cranbrook.
- Concerned about increase in flooding from surface water run-off in surrounding areas due to new development.
- Insufficient land has been made available for SANGS and biodiversity net gain.
- The new settlement should learn lessons from Cranbrook.
- Object to development east of Farringdon Cross as this will destroy rural setting.
- Concerned that already overstretched GP and hospital services will not be able to cover this area as well.
- South West Water are already discharging raw sewage, this will just make it worse.
- Concerned about the water supply to the new settlement.
- The additional traffic heading into Exeter will reduce its already poor air quality.
- This will have an adverse effect on tourism in the area.
- There are lots of animals in the area, such as deer, bats, owls and County Wildlife Sites.
- There are no adequate cycle facilities outside the new town area – should include a new bike route to the centre of Exeter and other local towns.
- The Local Plan states Hill Barton and Greendale can't expand because of adverse landscape impact and unsustainable location, but then proposes a new settlement in the same location.
- Want to see a far more detailed plan showing the layout of housing, roads and facilities.
- Concerned about how the new settlement is to be powered – there are huge problems in Cranbrook with heating and hot water.
- Option 1 will adversely affect the historic environment in the area, including 13 listed buildings in Farringdon.

Option 2

- DCC consider that Hill Barton is strategically significant for waste management and should not be constrained by non-waste development – the proposed new community will be impacted by noise, odour, traffic, dust etc at these waste sites, so parts of Option

1 and Option 2 (also including Greendale Business Park) are not suitable for residential development (also noted by other consultees).

- DCC state Options 1 and 2 contain an asphalt plant within Hill Barton Industrial Estate so would object to the introduction of noise/dust sensitive properties in close proximity.
- Agents for parts of Option 2 are not promoting 8,000 dwelling new towns but instead more modest developments - 1,000 to 1,500 homes schemes on land that features in their representations.
- Option 2 is a good location as it already has jobs, retail and public transport.
- Support as provides housing near infrastructure and employment without merging existing villages.
- Object to Option 2 due to landscape impact, particularly on AONB and to north of Woodbury Salterton.
- It will destroy our rural countryside.
- Options 1 and 2 have a higher visual impact than Option 3.
- Options 1 and 2 have less infrastructure than Option 3.
- Otter Valley Association object to option 2 as it would increase traffic through Newton Poppleford and increase congestion on the A3052
- Need to identify and protect best and most versatile agricultural land in Option 2.
- Inadequate road capacity, particularly on the A3052 but also the A376, B3179 and M5 junctions.
- Need detailed proposals on how the road network to Exeter will be improved
- Will have a negative impact on the way of life in surrounding villages.
- Object as biodiversity in the area needs to be protected, including County Wildlife Sites.
- Contrary to Farringdon Neighbourhood Plan.
- Development will increase flooding in the area.
- Option 2 is located over a water supply/bore hole where most of Farringdon receives its water.
- There is inadequate infrastructure in the area, for example schools, hospitals.
- This will create a link road from the A3052 and A30 that will become a rat run.
- This will lead to light pollution in Farringdon which currently has no streetlights.
- Another new town so close to the existing new town of Cranbrook makes no sense and will lead to the urbanisation of the area.
- There is too much emphasis on deliverability rather than the wishes of local people.
- It will be difficult to provide sustainable transport links into Exeter as no rail station.
- Sewerage outflows are already a problem in the area.
- The western and southern areas are reasonable infill, but the north eastern area encroaches into genuine green space.
- This will adversely affect the historic environment in the area, including 13 listed buildings in Farringdon.

- Will likely increase crime in the area.

Option 3

- Agents for parts of Option 3 are not promoting 8,000 dwelling new towns but instead more modest developments - 1,000 to 1,500 homes schemes on land that features in their representations (see, for example, McMurdo Planning response).
- Clyst St George Parish Council (PC) object to Option 3 due to the impact on character and setting of the historic medieval village
- Clyst St George PC object due to impact on existing residents.
- Clyst St George PC object as will exacerbate of existing highway and infrastructure problems.
- Clyst St George PC state the boundaries have been drawn without regard for topography or landscape importance. In the detailed response other issues raised include pre existing traffic issues, significant existing road flooding and risk to flood defences and existing properties, proximity to AONB and impact on approach to the village (especially from historic Woodbury Castle), lack of local employment increase in commuting, increase in congestion, lack of school places and other services such as shops.
- A landowner supports Option 3 as the best option – it offers good road infrastructure; public transport opportunities including close to rail links; proximity to Exeter city centre; proximity to a range of employment sites, retail and leisure facilities; access to open space.
- Landowner states Option 3 can accommodate a range of mixed uses (housing, employment, open space, leisure healthcare, infrastructure, Clyst Valley Trail) in a phased manner, with cooperating landowners.
- Landowner states that Option 3 can deliver earlier due to presence of rail links, road access and existing infrastructure, unlike the other two options where more substantial up-front infrastructure investment is required to deliver sustainable development.
- A developer (Vistry) support inclusion of Land at Addlepool Farm as forming part of a second option for a new town but consider this site can come forward on its own to accommodate a self-sufficient, sustainable, new village of 700 dwellings and facilities – Vistry submit a Vision Document for this land.
- A landowner (Mr and Mrs Murray) support Option 3 subject to the inclusion of their land of 2.1 acres/22 dwellings at Shephards Farm (map attached to Commonplace response).
- Ebford/Clyst St George has been identified as sustainable by three Appeal Inspectors and EDDC Planning Committee as it has numerous facilities, sustainable travel links, over 500 jobs but no housing to serve them – therefore support Option 3 with a connection north to Option 1 for the future.

- Clyst St George has poor public transport with no bus service, there are no safe pedestrian crossings to reach bus number 57.
- Topsham train station is 1.75 miles away has no car parking and too far to walk with no crossing points on route.
- A substantial area sloping north from Clyst St George is affected by flooding, with the ford regularly impassable – development in this area will adversely affect the 15 dwellings at Pytte near the ford.
- The majority of Option 3 is clay soil, surface water run-off is already a problem, including along the B3179, A376, Topsham Road and other local roads around Clyst St George.
- Clyst Valley frequently floods, which is getting worse with climate change – the proposed new settlement will exacerbate this.
- Object as it would ruin the historic medieval village of Clyst St George.
- Roads are already congested at peak times, particularly around Clyst St Mary, the A3052, the A376, B3179 and M5 where there are lengthy traffic queues.
- Absence of pedestrian crossings, combined with current traffic levels, makes it dangerous for pedestrians.
- Building on Option 3 will be detrimental to the western edge of the East Devon AONB, ruining beautiful views to and from Woodbury Castle, and destroying the stunning landscape between Clyst St George and Woodbury.
- Option 3 is the best option as it the least rural and limits the impact on the surrounding area, with better roads and amenities.
- This option has excellent transport links, easy to access popular locations like Exeter and Exmouth.
- Option 3 will benefit local shops in Woodbury.
- South western section of Option 3 will have an adverse impact where it spills over the ridge to Ebford.
- Object as there are limited employment opportunities, residents will need to commute elsewhere e.g. to Exeter, Exmouth, Science Park.
- The primary school in Clyst St George is too small to cope with a new settlement.
- There are no shops in Clyst St George, requiring new residents of Option 3 to travel elsewhere.
- Option 3 is contrary to the Clyst St George Neighbourhood Plan.
- Object as not on the railway line, so will lead to more traffic congestion.
- Will destroy the rural community and just become a suburb of Exeter – small villages of Woodbury, Woodbury Salterton, Clyst St George, Ebford will be dominated.
- SA Report states the reasons for rejecting Option 3, which should be adhered to.
- The gas and electricity network will not be able to cope with this development – Clyst St George is off-grid for gas.
- The open countryside and hedgerow is great habitat for wildlife.

- This land should instead be designated as Green Belt to promote health and well-being for residents in the area, including Exeter.
- Do not build on the wonderful Pebblebed Vineyard.
- Object due to increase in noise in the local area.
- Object due to impact upon the numerous listed buildings in the area.
- Easier to link to Topsham rail station and Exe Valley Trail than Option 1 to enable cycling into Exeter city centre.
- Local GP surgeries cannot cope with existing numbers of patients.
- It should be noted that Clge_26 was dismissed on appeal in 2015 – application reference 14/2424/OUT.

Omission sites for new town/strategic development

- Landowner (Mr C and Mrs S Murray) propose 2.1 acres of land at Shepherds Farm, off Oil Mill Lane to be allocated within new settlement Option 3 (plan attached to Commonplace representation).
- Barratt Homes propose land at Mosshayne Lane, Pinhoe for around 1000 homes, educational use and public open space, including a country park.
- Summerfield Planning Ltd disagree with the HELAA panel findings that site Clge_18 is unachievable and propose it is added to Option 3 which has the added benefit of delivering a section of the Clyst Valley Trail.
- Greendale Group and Crealy propose a new village located on a site within New Town Option 2, south of Option 1. A detailed technical report was submitted to support this submission.
- McMurdo on behalf of Broom, Down and Freemantle promotes a site for circa 1500 houses north of Clyst St George. The majority of this land overlaps/lies within Option 3 and could be allocated within it.
- Consider the area to the north of Exeter which still provides good access to Exeter and East Devon.

Policy 9 - Development within the Enterprise Zone

- Most respondents supported the principle of the enterprise zone, however there were some concerns about concentrating development away from existing settlements so that workers would have to travel by private vehicles, increased traffic and requiring developers to meet high standards.
- National Highways state the Local Plan will need to be underpinned by robust transport evidence to demonstrate it is deliverable, enables any necessary mitigation, and to

understand access proposals, including the collection of sites in policies 9-15 which face the A30 and M5 Junction 29.

- Devon County Council recommend adding reference to 'A Clean Growth Vision for Development in the West End of East Devon' to all employment policies in chapter 4.
- More specific points included:
- Devon County Council (DCC) feel that no reference should be made to District Heating connections specifically, rather a more flexible policy that considers all potential forms of clean energy and highlights economic opportunities from the move towards Net Zero.
- DCC state that BREEAM requirements should match other employment allocations.
- Devon Wildlife Trust would welcome the inclusion of reference to the requirement for protection and enhancement of our natural environment in policy.
- Clyst Honiton Parish Council recommends that new housing developments should include better cycling and walking routes. This has not always been done in the past, and land ownership can be a challenge to overcome.
- It concentrates activity and jobs unevenly.
- Difficult for young people from the rest of the District to access jobs in the West End using public transport.
- Concentrating development in the Enterprise Zone means that residents will need to drive a considerable distance to work. This conflicts with the aim of providing jobs close to home.
- Joined up public transport is essential
- Will increase HGV's and congestion. Existing employment eg Amazon and Lidl traffic was supposed to utilise rail freight
- "Will need" needs to be clarified and strengthened. Delivery model prioritises developers objectives/developers essentially pick and choose what they want to build/employment will be lost to housing as it makes more profit for developers
- There must be sufficient resource in the relevant council department to ensure that high quality development is delivered and developers don't dilute provision.
- Support high energy efficiency in new buildings. By requiring BREEAM rather than Passivhaus (or similar) standards you are enabling developers to get away with lower performing buildings and thus "greenwashing" their and EDDC's eco pronouncements.
- Businesses will move away once grant funding dries up or greater incentives eg tax free zones, are offered elsewhere
- Long term these employment premises might only be for storage with few employees, the most important aspect of this scheme is the Exeter Logistics Park.
- Emerging investment and economic development is supported. However, the BREEAM Excellent or equivalent standards is an excessive constraint to development if it is considered a prerequisite of approval.
- Link with Exeter UNi, Met Office SWW etc

- A cost benefit and risk assessment is needed to ensure that the Enterprise Zone does not pull skilled people way from other nearby smaller local hubs and SMEs
- What about north Axminster and expansion of Greendale? Let's keep an open mind about post 2040 enterprise zones.
- Zero emission shared mobility, such as ebikes and e car clubs, is aligned with Enterprise and Innovative ethos, yet not mentioned. Suggest these are included and promoted
- I am in favour of developments for enterprise and research, constructed on brownfield sites.
- Some good parts - digital infrastructure and district heating. I feel this should be considered in the context of Cranbrook ad they should complement each other.
- These sites are well chosen and meet all our present needs in terms of required capacity over the Plan period.
- This development is not needed to serve the needs of local people.
- The impact of Exeter's policy to redevelopment existing employment sites and EDDC's policy to further limit the location of B2/B8 uses needs to be assessed in terms of its cumulative impact on employment land supply specifically for industrial uses which are most affected by these policies.

Policy 10 - Exeter and East Devon Science Park

- A number of respondents expressed support for the Science Park and what it is doing.
- Devon County Council recommend highlighting the economic opportunities from the move towards Net Zero, including adding a reference to 'A Clean Growth Vision for Development in the West End of East Devon'.
- The text stating it may take up to five years for passenger numbers to return to their 2019 levels should be sourced, otherwise it sounds spurious and hopeful.
- Concern that benefits of new jobs are not being seen.
- Concern that business attracted to a Science Park are transient, might move away, and jobs are not guaranteed as permanent.
- Policy should also support creative industries to.
- Concern that Exeter Science Park leads were not consulted on the proposals.

Policy 11 - Land north of the Science Park

- Most respondents supported the principle of the enterprise zone, however there were some concerns about concentrating development away from existing settlements so that

workers would have to travel by private vehicles, increased traffic and requiring developers to meet high standards.

More specific points included:

- Repetitious - Policies 10 and 11 overlap/are the same
- Development is not required/no need for additional jobs.
- More loss of greenfield space/more greenspace is needed.
- Support policy/seems sensible/area already developed so support proposals.
- Housing development should be considered amongst the science park and indeed could take a new town.
- This area will require workers to travel (by private vehicles) and there is no permanent commitment to public transport
- Will deter start-ups and could lead to research and technology businesses being asked to leave if they are not successful?
- Cumulative development across the GESP area will be detrimental to East Devon
- The businesses there must fully integrate not only creative components but also be fully engaged in delivery of high quality technical apprenticeships.
- Businesses could offer limited Greg Wallace type 'Inside the factory/business' tourism experiences
- There are already empty units at Sowton Ind Est
- How will "New business developments will need to be of the highest quality and should reflect forms of development in the surrounding area" be tested and enforced.
- Devon County Council state large scale logistics and industrial uses should be considered incompatible with Sowton Village and the Science Park due to close proximity of housing and the high-quality Science Park environment.
- The sewage system in this area needs to be improved before any further development can take place in the area.

Policy 12 - High quality employment north of Sowton village

- This policy received some support although particular concern about the amenity impact on Sowton village, traffic impact and lack of public transport and level of need for the development was raised.
- Historic England note that the Sustainability Appraisal indicates that a proposed allocation would have an impact on the adjacent heritage assets including the Sowton Conservation Area. It would be helpful to appreciate whether a Heritage Impact Assessment has been undertaken to inform the principle, location and form of development.

More specific points included:

- Repeats other employment policies
- Cycle access by Sowton Lodge and J29 should be improved
- Object to further development
- Concentrates too much traffic at an already overwhelmed pinchpoint of the road network.
- High quality development should be the norm, not the exception.
- Unacceptable impact on Sowton village
- B class development is not the best type of employment
- This is a reasonable place for B uses.
- Businesses using HGVs and large polluting diesel motors could be located close to the main arteries, rather than impacting on the countryside and narrow, rural lanes.
- This will meet Exeter's employment need, it is excessive for locally generated need
- Where will Sui Generis commercial uses be located?
- Housing and employment should be co-located to reduce travel
- Sowton neighbourhood plan should be taken into account
- This will add to the sustainability of the city and create significant investment and job creation for the East Devon District.
- The scale of the allocation means a diverse range of businesses can be accommodated, strengthening the economy and allowing for the creation of new business relationships and synergies. These connections are also likely to be made with the many existing businesses on the Science Park close by.
- The site's proximity to the A30, immediately to the north, the M5 to the west and Exeter airport to the north-east is a significant benefit.
- The site promoter points out that policy states that the site measures around 17 hectares but it in fact measures approximately 19.3 hectares.
- The policy only allows use classes B2, B8, E(g) and a limited element of ancillary uses such as indoor sports, recreational, crèche or cafe. The policy should be interpreted to permit sui generis uses that may also be in the spirit of the B and E(g) uses listed above.
- To support the LP ambitions to deliver net zero developments and to combat climate change, the allocation should include provision for battery storage infrastructure. This will provide for on-site needs, support the resilience of the grid and support renewable energy, and enable surplus energy to be utilised efficiently.
- Visually attractive development is essential. Ensure that future development creep is avoided/managed and that a strong visual gateway to the south west is maintained and enhanced

- Need to explain how this connects into existing sustainable transport networks, noting that an extra 300 space car park was built at the first Science Park.
- This is a more sensitive site than other proposed employment sites in the West End.
- Community benefits for Sowton village should be a requirement.
- The low-traffic Sowton Lane to Taylor's Break should be enhanced and linked to this development, and also suitable cycling/walking route across to the Blackhorse pub and Blackhorse Lane
- Need to retain this greenspace for leisure activities.
- Developer (Waddeton Park) states this land has been subject to feasibility work and discussions with Exeter Airport which show that development can proceed without adverse impacts on the Airport.
- National Highways query this allocation as it appears to have limited local highway access and is adjacent to the strategic road network (the A30).
- Devon County Council state large scale logistics and industrial uses should be considered incompatible with Sowton Village and the Science Park due to close proximity of housing and the high-quality Science Park environment.
- DCC are not clear how this site will be accessed, whether from the A30 or M5 and a large new junction may be required at significant cost.
- Sidmouth Arboretum -
- - The policy would be strengthened if there was a specific mention of the use of trees around the site perimeter to act as a screen. As with the new town centre, preemptive planting of trees on the boundary of the proposed site would mean the tree screen could grow sufficiently to act as a screen even as the building work was going on.

Policy 13 - Exeter Airport and its future operation and development

- Some concern was expressed around the suitability and appropriateness of supporting airport operation/existence, adverse environmental impacts highlighted. Though in contrast there was also support for the airport with a call for more flights to more destinations.
- Policy should resist loss of airport land to non-airport related uses.
- Concern that effort should go into improving rail links rather than the airport and suggested there should be 24 hour bus access.
- Support for low carbon air travel aspirations and educational opportunities at Exeter College.
- Support for noise impact limitations, but also concern that too much nearby residential development will threaten the viability of the airport and also that the airport will adversely impact on new homes.
- Concern raised over inappropriate car parking at and around the airport.

- EDAL support the positive tone of this policy and its support for the future operation and growth of the Airport - However, it is considered that greater clarity should be provided in the third paragraph of the policy. This seeks to prevent development harming the role and functions of the Airport, which is supported, but its positioning in the text as a whole and in context following the first two paragraphs might give the impression that it only relates development within the operational boundaries.
- Clyst Honiton Parish Council agreed the policy, however not optimistic about the future of Exeter Airport. They believe the future of Exeter Airport is uncertain, and its closure could have a significant impact on the west end of Exeter. The airport is a major employer and tourist attraction, and its absence could make the area less attractive to businesses and visitors
- Support for employment benefits from the airport and calls for better links to with aviation research and development elsewhere.
- Concern that all land around the airport will be turned into a solar farm.
- A call for a more adaptive policy should the airport no longer be viable.
- The airport would benefit from dry, secure and bookable cycle storage facility to allow travellers to do at least the local parts of their journey by bike.

Policy 14 - Employment land to the east of airport buildings

- There was support for this policy but a number of respondents were keen to see uses that support the airport.

More specific points included

- Devon County Council state there is no reference to any required sustainability standards as with other employment allocations.
- Clyst Honiton Parish Council was disappointed that a cycle route from Cranbrook to the proposed LDO site was deemed outside of the brief. They believe that the needs of the community should be prioritized over what developers want to provide
- Object to loss of agricultural land.
- Object to crèche facilities on industrial estates, especially where noise from aircraft can damage babies development.
- Must accord with NPs and new NPPF to follow this year
- Repeats other employment policies in the plan.
- Unclear as to what is meant by non-business uses?
- Don't need more employment development around the airport unless it directly benefits it.

- This land is already addressed by an LDO so to some extent the proposed allocation might become secondary to its future development. It will still be possible to make planning applications outside the LDO so it is important that the policy is appropriately framed.
- For clarity the second bullet point of the draft policy should be strengthened and amended to read, “A limited element of uses such as indoor sports, recreational, creche or cafe will be permitted but only where strictly ancillary to the development of the above employment uses.”
- The granting of the LDO was a missed opportunity to resolve highways and accessibility issues locally. Even with the addition of a series of limits and controls to the development it allowed it would still have a material negative impact on the operation of the highways network locally. The key junction (Long Lane / B3184) will operate above capacity and with queues at peak times extending back beyond the entrance to the Airport. Weaknesses were also identified in terms of pedestrian, cycle and public transport access. The LDO was nonetheless passed due to the benefits its implementation would deliver.
- The policy should be amended to say “Development proposals for the site must be accompanied by measures to provide fully for its infrastructure requirements. Mitigation will be required to avoid any negative impact on the operation of Long Lane, the B3184, and the junctions along and between these routes.”
- Solar panels should be required on buildings, rather than using agricultural land for solar
- Needs high quality public transport and provision out of usual business hours
- Perhaps Power Park could support e-mobility.
- Close to airport so better for development than other areas.
- Support provision of ancillary uses.
- Reference to ensuring that this development is not like Hill Barton for environmental and amenity reasons.
- The scheme should not include housing but should provide parkland.
- Exeter Airport must confirm that it has the air transport business to meet the building needs and will not have vacant buildings.
- Do not permit uses that will impact on local amenity eg odor and noise
- Is there evidence as to the scale of need?
- We have adequate employment land provision in East Devon, and this adds to the choice and ensures no restraint upon businesses developing here or relocation to our area.

Policy 15 - Employment land east of the Airport and north of the A30

- Land east of the Airport was generally felt to be a suitable location for employment development, especially if uses were related to the airport. A need for greater clarity in the wording of the policy was raised by several respondents, as were concerns at the lack of public transport, distance from settlements and general increase in traffic generated by the uses.

More specific points included:

- Devon County Council state there is no reference to any required sustainability standards as with other employment allocations.
- DCC state other uses like education/training should be referenced, noting the Skills Academy and aeronautical engineering opportunities.
- Policy wording is difficult to understand
- Restoration of rail links within East Devon and increased capacity is preferable to development of the airport
- No childcare this close to the airport as noise affects children's development
- Support quality office space/B uses
- This employment development should not be used to justify a new town.
- This must accord with the NPPF and NPs.
- Repeats other employment policies.
- Exeter Airport has good public transport to Exeter but not the wider District.
- Support to a (quite rightly) diminishing aviation sector is outdated and inappropriate to current and future climate change targets.
- Support development related to the aviation sector.
- Reference to "A limited element of B8" is imprecise and needs to be clarified. Clarify how to interpret to avoid the site simply becoming a distribution park.
- Reference to the development of "Sui-generis uses which comply with this policy" is imprecise. Clarity should be provided in terms of what this means and how it should be interpreted.
- The fourth bullet point of the draft policy should be strengthened and amended to read, "A limited element of uses such as indoor sports, recreational, creche or café but only where strictly ancillary to the development of the above employment uses."
- Reference to the promotion of active travel measures should be strengthened and amended such that the provision (rather than just promotion) of active travel measures is required, along with associated infrastructure; the same should be required for public transport.

- Any development of the site should be required to mitigate fully its highway impact. The site and Strategic Policy 14 / LDO land will place pressure on Long Lane, the B3184, and the junctions along and between these routes. Silver Lane was also mentioned.
- The granting of the LDO was a missed opportunity to resolve highways and accessibility issues locally. Even with the addition of a series of limits and controls to the development it allowed it would still have a material negative impact on the operation of the highways network locally. The key junction (Long Lane / B3184) will operate above capacity and with queues at peak times extending back beyond the entrance to the Airport. Weaknesses were also identified in terms of pedestrian, cycle and public transport access. The LDO was nonetheless passed due to the benefits its implementation would deliver.
- The policy should be amended to say “Development proposals for the site must be accompanied by measures to provide fully for its infrastructure requirements. Mitigation will be required to avoid any negative impact on the operation of Long Lane, the B3184, and the junctions along and between these routes.”
- Do not permit uses that will impact on local amenity e.g. odour and noise
- Solar generation would be a better use for this land
- The land near the airport should be used for a wider range of uses - limiting to the wording above is likely to make it unviable
- No need for this development/employment allocations are already excessive.

Policy 16 - Green infrastructure and the Clyst Valley Regional Park

- The Clyst Valley Regional Park, established originally through policy of the currently adopted local plan forms a landscape scale green space area within which major development proposals sit. Parts of the park are more formal, albeit of naturalistic nature, while other parts are in farming or other non-developed uses. The policy intent is to enhance the natural qualities of the park as well establishing outward expansion of the extent of the park, though in the draft [policy a potential new boundary was not defined, noting that this would be in work to follow. Key matters raised in comments received included:
- Devon County Council support enhanced walking and cycling provision, and development in the area should connect to this – needs to meet LTN 1/20 standards.
- The Environment Agency broadly welcome this policy, which offers opportunities to link to natural networks both upstream and downstream and should be supported by the plan in principle. The CVRP could provide space for Exe Estuary habitats to adapt to climate change as sea levels rise, although this might be most appropriate in policy 86.
- Natural England support the policy objectives for the Clyst Valley Regional Park. Natural England would welcome the addition of biodiversity net gain to policy objective d). The

scale of new development in the west of the district may require off-site net gain opportunities to be in the greater Exeter area. Achievement of the Regional Park's potential will require a bespoke monitoring plan.

- Natural England advise that a Green infrastructure policy should be developed for across the whole of East Devon (not just the Clyst Valley Regional Park).
- Savills on behalf of FWS Carter & Sons state if their proposed motorway service station is allocated then it should be removed from the CVRP, as has occurred for employment land north of Sowton village in Strategic Policy 12.
- The Devon Countryside Access Forum suggest wording to strengthen this policy.
- A number of respondents saw the policy (provision of the park) as justification for a second new town and other major developments which they opposed and as such challenged the need, logic or justification for the park/policy.
- Some comment received also just expressed opposition more generally to development.
- There were, however, also expressions of support for park provision and policy, with respondents noting existing successes of the park.
- Sidmouth Arboretum welcomes the proposals for the CVRP, particularly raising the canopy cover from 10% to 30%. We note that the Park's objectives open with the role of true greenness in promoting health and wellbeing.
- Enhanced and more cycle routes were supported in comments but there were also challenges in respect of impacts on walkers/pedestrian safety (on multi-user routes) and costs and long timescale to deliver.
- Public toilet provision was called for in policy.
- Barratt Homes support policy and suggest that the northern part of their proposed allocation at Mosshayne Lane will contribute to achieving the objectives set out in the policy.
- The National Trust raise the issue that new development will significantly add to population levels in the west of the District and therefore delivery of the Clyst Valley Regional Park is vital to provide access to greenspace. The National Trust is supportive of the objectives as set out within this policy which are broadly consistent with the National Trusts 2020-2025 strategic aims. The Trust provide details in their representation of the work they are doing and its relationship to the Clyst park and wider benefits and outcomes that may result.
- Exeter Cycling Strategy- e - Given the major target of creating 80km of traffic free trails and quiet ways, we would like to see this rephrased as "Creating cycling and walking opportunities..."
- Clyst Honiton Parish Council supports the policy but is concerned about the sewage problem. They believes that the sewage problem must be addressed before any further development can take place in the area.

Policy 17 - Development next to the M5 and north of Topsham

- Devon County Council state the proposed Masterplan should consider the provision of a 1.8 ha primary school site, along with primary, secondary and special education contributions (DCC will consider this allocation alongside the emerging Exeter Local Plan).
- DCC state sustainable transport links across the railway will need to be provided, as identified in the emerging Clyst Road Access Strategy.
- Exeter City Council stress the importance of joint working with the City Council on the 580 homes to ensure adverse impacts are minimised whilst providing an attractive environment. Development should be coordinated and aligned with nearby development in the city. Policy and supporting text should emphasise that development should be brought forward in accordance with a comprehensive access strategy and should also seek to protect the sensitive Clyst Valley.
- Devon Wildlife Trust state - Whilst we appreciate that a masterplan is yet to be produced for this site, we would like to see the inclusion of targets for the creation of local natural habitats included within this policy, in line with the figures provided for new homes and employment land.
- Topsham has already endured disproportionate over-development in recent years, and now joins up with Exeter.
- The development of sites 91-94 will significantly intensify the traffic along local roads, particularly Newcourt Road, Denver Road and Exeter Road. This will have a negative impact on air quality and safety
- The traffic congestion and exhaust fumes of additional traffic are already creating major hazards for residents even before the full effect of the current developments have been felt.
- Newcourt Road should be retained as a low-traffic environment offering an important and safe route for pedestrians and cyclists.
- Topsham has become a high-speed rat run which will be made considerably worse by increased development.
- In addition to traffic concerns, GP services and the local infrastructure are already under considerable strain.
- Otter Valley Association object to this development due to impact on A30, road noise due to proximity to the M5.
- National Highways state evidence is required to understand the transport impact of this proposal on the strategic road network.
- National Highways recommend the policy includes noise and visual intrusion impacts from the M5, to ensure this constraint is picked up in masterplanning and protect the well-being of future residents.

- Exeter Civic Society has objected to the proposed developments in Topsham and Exminster. They believe that the developments would threaten the 'green wedge' and rural aspects of the area, fly in the face of neighbourhood plans, and add to traffic congestion.
- A site promoter strongly supports policy and contends that a masterplanning exercise demonstrates additional capacity that could be delivered early in the plan period - the site includes some existing employment, and this can be expanded and upgraded as part of the delivery of the allocation.
- Object to site at Topsham because of extra traffic along Topsham Road and Clyst Road, impact on landscape character (including green wedge), and pressure on Topsham facilities.
- Concerned about the loss of green land in their area and The loss of open space will have a detrimental impact on plants and wildlife.
- Placing new houses near roads and stations would be the best solution, it would allow people to have access to public transportation, such as buses and the cycle path, which would reduce the need for cars.
- GP services are under strain, with patients facing long and dangerous wait times.
- The proposed development in Exminster is challenging because it is large and isolated, and there is a risk that it will become a dormitory suburb. The provision of services and facilities will be difficult, and it will require a high degree of commitment to provide a genuinely sustainable solution.
- Topsham is a complex historical town with a mix of different styles of development. The town should be transformed into a green wedge and sports hub,
- Topsham is a village that has lost its boundary with Exeter. It has had a lot of development that is not affordable and cannot cope with any more. The healthcare sector is struggling to cope with the growth of the population, especially as many people retire to the area.
- Topsham has been ruined by recent developments that do not reflect the town's character. Demolish the town and build blocks of flats instead.
- A response was concerned about the impact of traffic and over-development in Topsham. They welcome the idea of a masterplan, but are concerned that it may not be implemented.
- The absorption of Topsham into Greater Exeter has eroded the town's historic identity. The loss of the Green Corridor is a major factor in this, and further intensification of this process would be a terrible error.
- Make sure that there are pedestrian and cycling paths available. Some people may not want to live so close to the noisy motorway.
- A second town in West of East Devon is not needed, as local people do not want it. The demand for homes is coming from people leaving cities, which is putting unnecessary pressure on rural areas.

Policy 18 - Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line

- Most respondents accepted that there is a need for Gypsy and Traveller provision although support for a site in this location was very limited.
- More site specific points included:
- Devon County Council support this policy, particularly paragraphs 5.65-68.
- The Environment Agency are pleased the policy acknowledges the need for supporting infrastructure and that the area at risk of flooding needs to be avoided – a flood risk assessment will be required to determine the developable area taking account of climate change. Supporting infrastructure needs to include foul drainage.
- Pinhoe Village residents have submitted a proposal for an alternative ‘safe, traffic-free active travel route connecting the communities of Pinhoe, Monkerton and Tithebarn to Pin Brook and Clyst Valley Parks, using paths identified by our communities as historical access points, safeguarding the biodiversity of the wildlife linescape along Pin Brook flood meadows and Pinhoe’s Community Field, protecting the character and historical significance of this marshland area.’ The submission includes maps of the proposal.
- The site is isolated and not integrated alongside bricks and mortar housing, contrary to policy 8.
- Appropriate provision and facilities (including green space, sanitation, school access and running water) are supported.
- A larger number of small sites, distributed across the District would assist integration
- Very close to areas of flood risk/will increase flood risk. Development will adversely impact by additional new hard surfaces, road infrastructure etc. reducing existing green soak away capacity of this green field site.
- Concerns regarding security, visual impact, waste, litter, parking etc.
- Access to the site is poor for larger vehicles, given the low bridges and the site boundary hedges will be destroyed to create access and visibility. No technical highways assessment is evidenced to support the draft allocation. The sustainability appraisal for the site is out of date, invalid and connectivity distances are now far greater.
- Allocation is premature as needs assessment is still underway.
- No alternative sites have been considered.
- How will provision be made/site separated to accommodate different types of Gypsies and Travellers
- Gypsies and travellers should be involved in these proposals at the outset
- Will the site be funded by EDDC taxpayers or the Travellers living on the site.
- Langaton Lane is a green lane

- Otter Valley Association object to this allocation due to proximity to the M5 and noise exceeding WHO limits.
- National Highways suggest potential noise impacts from the M5 should be considered to ensure noise issues are not experienced by future residents.
- Bricks and mortar housing is unacceptable in this countryside location, Traveller housing should be treated the same way.
- Traveller site should be incorporated into new settlement
- Only one Traveller site is identified. This suggests it was promoted by landowner rather than being chosen as a site alongside strategic growth from a range of options
- Close to area of flood risk, development will reduce existing green soak away capacity and increase run off.

Chapter 5 - Policy omissions from - Future growth and development on the western side of East Devon

- Savills on behalf of FWS Carter & Sons propose a new motorway service area on the M5 to the north of Exeter, with a report explaining why it should be allocated.
- Landowner submits an employment site for allocation at Oaklands Field, Aylesbeare, adjacent to the A3052 (HELAA 2021 call for sites ref. Mp131fb).
- Concern that there is just too much development proposed in the west of East Devon with impacts on infrastructure needs, provision and current supply. Development is not considered to be meeting or matching local need.
- Pinhoe and Broadclyst medical practice – highlight inadequate provision of and funding for primary care provision.
- Concern that strategic approach does not protect existing settlements and existing residents.
- The view was expressed that - The celebration of Exeter as the fastest growing city in England is in fact a reflection of atrocious planning and poor leadership.
- Need policy to promote mixed use town centres and regeneration, not just mixed use new development.
- Local Plan policies should apply to Cranbrook so that the standards and requirements in Cranbrook do not lag behind those elsewhere in East Devon.
- A site promoter advocates additional allocations on the edge of Cranbrook, such as at London Road (16/1825/MOUT).
- Concerned that Brcl_21 has been overlooked as not shown on the Commonplace interactive map despite being in HELAA.
- Stags on behalf of client submit site Upto_04 as a sustainable location close to Exeter for 150 homes, a cycle interchange, highway/transport improvements and a mixed use space.

- Pinhoe Village residents have submitted a proposal for an alternative 'safe, traffic-free active travel route connecting the communities of Pinhoe, Monkerton and Tithebarn to Pin Brook and Clyst Valley Parks'