

Agenda for Strategic Planning Committee Friday, 21st July, 2023, 10.00 am

Members of Strategic Planning Committee

Councillors: B Bailey, J Bailey, K Blakey, B Collins, O Davey (Chair), P Fernley, C Fitzgerald, M Hartnell, P Hayward, M Howe (Vice-Chair), B Ingham, D Ledger, Y Levine, T Olive and H Parr

Venue: Council Chamber, Blackdown House, Honiton

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1 Public speaking

Information on [public speaking](#) is available online

2 Minutes of the previous meeting (Pages 4 - 8)

3 Apologies

4 Declarations of interest

Guidance is available online to Councillors and co-opted members on making [declarations of interest](#)

5 Matters of urgency

Information on [matters of urgency](#) is available online

6 Confidential/exempt item(s)

To agree any items to be dealt with after the public (including the Press) have been excluded. There are no items which officers recommend should be dealt with in this way.

7 Draft East Devon Local Plan 2020-2040 Consultation Feedback (Pages 9 - 534)

This report seeks to set the scene for the appended full feedback report on the draft local plan consultation.

The draft local plan feedback report includes:

- Summary, contents & introduction (agenda pages 17-46)
- Chapter 1 – Introduction, evidence & policies (agenda pages 47-49)
- Chapter 2 – Vision & objectives (agenda pages 49-53)
- Chapter 3 - Spatial Strategy (agenda pages 54-103)
- Chapter 4 – Employment provision & Distribution Strategy (agenda pages 103)
- Chapter 5 – Policy omissions from – future growth & development on the western side of East Devon (agenda pages 104-134)
- Chapter 6 (Part A) – Strategy for development at principal centres and main centre (agenda pages 135-229)
- Chapter 6 (Part B) – Strategy for development at local centres (agenda pages 230-265)
- Chapter 6 (Part C) – Strategy for development at service villages & other sites (agenda pages 266-343)
- Chapter 7 – Tackling climate change & responding to climate change (agenda pages 344-376)
- Chapter 7 – Policy omissions from – Tackling climate emergency & responding to climate change (agenda page 376)
- Chapter 8 – Meeting housing needs for all (agenda pages 377-411)
- Chapter 8 – Policy omissions from – Meeting housing needs for all (agenda page 411)
- Chapter 9 – Supporting jobs & economy & vibrant town centres (agenda pages 412-423)
- Chapter 10 – Designing beautiful & healthy spaces & buildings (agenda pages 424-431)
- Chapter 11 – Prioritising sustainable travel and providing the transport & communications facilities we need (agenda pages 432-444)
- Chapter 11 – Policy omissions from - Prioritising sustainable travel and providing the transport & communications facilities we need (agenda page 445)
- Chapter 12 – Caring for our outstanding landscape (agenda page 446–459)
- Chapter 12 – Policy omissions from – Caring for our outstanding landscape (agenda page 459)
- Chapter 13 – Protecting and enhancing our outstanding biodiversity and geodiversity (agenda pages 460–475)
- Chapter 13 – Policy omissions from - Protecting and enhancing our outstanding biodiversity and geodiversity (agenda page 476)
- Chapter 14 – Open space and sports and recreation facilities (agenda pages 477–482)
- Chapter 14 – Policy omissions from - Open space and sports and recreation facilities (agenda page 482–483)
- Chapter 15 - Our outstanding historic environment (agenda pages 483–489)
- Chapter 15 – Policy omissions from - Our outstanding historic environment (agenda page 489)
- Chapter 16 – Ensuring we have community buildings and facilities (agenda pages 490-491)
- Chapter 16 – Policy omissions from - Ensuring we have community buildings and facilities (agenda page 491)
- Chapter 17 –Implementation and monitoring of the local plan (agenda pages 492–493)
- Chapter 18 – Have we missed anything? (agenda pages 494-495)
- Issues raised that are not necessarily directly relevant to the local plan (agenda pages 496–498)
- Responses to the Sustainability Appraisal (agenda pages 498-504)
- Conclusions and next steps (agenda page 505)
- Appendices:
 - Appendix 1 – Feedback on comments on the Commonplace platform (agenda pages 506– 508)
 - Appendix 2 – Feedback from in-person submissions at the consultation

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Members of the public exercising their right to speak during Public Speaking will be recorded.

[Decision making and equalities](#)

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EAST DEVON DISTRICT COUNCIL**Minutes of the meeting of Strategic Planning Committee held at Council Chamber, Blackdown House, Honiton on 9 June 2023****Attendance list at end of document**

The meeting started at 10.00 am and ended at 11.58 am. The meeting was briefly adjourned at 11.23 am and reconvened at 11.36 am.

1 Public speaking

Councillor Geoff Jung spoke on the East Devon local plan update report in his capacity as Portfolio Holder for Coast, Country and Environment. Members were asked to consider a further recommendation referring to the second bullet point from paragraph 3.8 that read 'to present a case that there are such fundamental constraints in a local planning authority area that the required numbers cannot be acceptably accommodated'.

The reasons for the further recommendation would take into consideration the following:

- It has been shown that this council had increased its housing stock by over 13% in the previous 10 years whilst the national average was only 6%.
- East Devon is a coastal area where infrastructure is more costly. Inland communities are connected by their neighbouring communities with interconnecting roads, rail and utilities. However, coastal communities only have half a circle of influence as the other half of the influence is the sea.
- 75% of East Devon has designated areas including large areas of Areas of Outstanding Natural Beauty and the Exe Estuary.

2 Minutes of the previous meeting

The minutes of the Strategic Planning Committee held on 7 March 2023 were confirmed as a true record.

3 Declarations of interest

Minute 6. East Devon local plan update report.
Councillor Olly Davey, Other Registerable Interest, Exmouth Town Councillor.

4 Matters of urgency

There were no matters of urgency.

5 Confidential/exempt item(s)

There were no confidential/exempt items.

6 East Devon local plan update report

The Assistant Director – Planning Strategy and Development Management presented an update report on the East Devon local plan that provided Members with an overview of the work that had been done to date on the local plan and an explanation to why the standard methodology for housing numbers figure had changed since the committee had last met.

Members were advised that the draft local plan was currently at the Regulation 18 stage in which the council needed to prepare its strategy and approach following the public consultation earlier this year. Members noted that a further detailed report on the issues raised during that consultation would be brought to Committee in July for further consideration.

The Assistant Director – Planning Strategy and Development Management also addressed the housing numbers confirming that the present standard methodology housing number figure for East Devon now stood at 910 homes per year compared to 946 homes per year as previously advised. This was a consequence of an update to the affordability ratio between house prices and household income. Members were warned that there was a high possibility that these figures could change due to further updates in the future and potential changes to the National Planning Policy Framework (NPPF) and to the Levelling-up and Regeneration Bill.

In relation to these potential changes Members' attention was drawn to the current local plan making timetable detailed in paragraph 6.1 of the report where Members were advised that these dates were no longer achievable and that an updated timetable would be brought to committee in July or August 2023.

Questions raised by Members included:

- Clarification was sought on the proposed NPPF changes. Members were guided to a useful summary detailed in the 14 February 2023 agenda.
- There was a need for the Council to change its attitude when considering its housing stock to ensure that all houses built over the next 10 years address housing need and climate change. In response the Assistant Director – Planning Strategy and Development Management advised that the council was bound to current government planning guidance and legislation in terms of its planning process and that suitable land was needed first before housing stock and this depended on landowners bringing forward land for development. The Assistant Director – Planning Strategy and Development Management referred to Councillor Jung's statement and advised Members that although East Devon was heavily constrained the Inspector, when examining the local plan, would not be likely to consider this as sufficient justification for not meeting our housing need.
- Several members expressed a view that they did not want to accept the Government's Standard Methodology figure and that the council should take a stand and say no.
- Reference was made to the significant number of houses being developed in Cranbrook and a question was raised about how that would fit in with the five year land supply figure. The Assistant Director – Planning Strategy and Development Management advised that housing numbers can only be counted if they had either been granted full planning permission or reserved matters approval.
- It was suggested that restrictions should be put on houses to ensure only people living in East Devon could purchase these houses.
- Reference was made to paragraph 3.10 and the duty to cooperate and a concern was raised about whether this meant that this council had to accommodate neighbouring authorities housing numbers as well as its own housing numbers. Where does this council stand if our duty to cooperate means that our housing numbers could increase to 1,000 instead of 910 houses?
- It was suggested that there was a requirement for different housing types to maintain a well-balanced community. Cranbrook has mostly two or three bed houses and does not take into account other requirements for larger families.

- It was suggested there was a demand for one bed flats. Members were advised that policies could be put in place to secure different house types through the new Local Plan but until this had been adopted the policies in the current local plan had to be complied with.
- When considering the housing numbers it is important to consider that a proportion of people in East Devon are over the age of 65 which has a greater impact on the health sector.
- There was a need to consider the impact on our water and waste water and sewage services particularly when our water company is one of the worst performing in the country. This impact is further increased by East Devon being a coastal region as well as being a tourist region.
- Clarification was sought about the implications if the council did not comply with the standard method for calculating the housing need. Members were advised that if the local plan was found unsound the consequence would be that the council would have to start at the beginning again which was not a good position to be in. The Assistant Director – Planning Strategy and Development Management acknowledged Members concerns about the housing numbers and suggested that if Members wished a further report to consider these issues could be brought to a future meeting.

The following motion was proposed by Councillor Todd Olive and seconded by Councillor Yehudi Levine:

‘That a further detailed report outlining the risks associated with trying to present a case that there are fundamental constraints in a local planning authority areas that the required numbers cannot be acceptably accommodated be brought to a future Strategic Planning Committee meeting.’

Discussions related to the proposed motion included:

- It was suggested that there was a need to hear about the other options that the council could choose to take and the risk involved with those options;
- It was suggested that the report would need to be comprehensive with everything on the table so that Members could have a broad debate to help them reach an informed decision. Members did not want this to be a pointless exercise.
- It was suggested that the report should be brought back to committee as quickly as possible.

Following discussions Councillor Todd Olive and seconder Councillor Yehudi Levine were happy to amend their motion to read:

‘Following consultation with the Chair and Vice Chair of Strategic Planning Committee a further detailed report outlining the risks associated with trying to present a case that there are fundamental constraints in a local planning authority areas that the required numbers cannot be acceptably accommodated and the options that the Strategic Planning Committee may take on board when considering appropriate housing need be brought to committee as soon as possible.’

RESOLVED:

1. That the ongoing and future work on preparation of the East Devon local plan be noted.
2. That the housing need figure in East Devon generated from the Government standard methodology, now stands at 910 new homes a year and that this figure is lower than the 946 homes per year that was reported on in 2022 be noted.
3. Following consultation with the Chair and Vice Chair of Strategic Planning Committee a further detailed report outlining the risks associated with trying to

present a case that there are fundamental constraints in a local planning authority areas that the required numbers cannot be acceptably accommodated be brought to a future Strategic Planning Committee meeting and the options that the Strategic Planning Committee may take on board when considering appropriate housing need be brought to committee as soon as possible be agreed.

7 **Proposed response to the Government Consultation on short-term lets**

The Committee considered the Assistant Director – Planning Strategy and Development Management’s report outlining the proposed response detailed in appendix A to the Government consultations on short-term lets which if imposed would impact on East Devon District Council by the following planning issues:

- potential new policies on short-term lets;
- changes to the Use Class Order and to permitted development;
- impacts to access and affordability of housing;
- impacts on tourist accommodation;
- Implications for delivering corporate plan objectives on housing, economy and communities.

The proposed changes would relate to:

- the introduction of a new Use Class (C5) for short-term let accommodation without the requirement for planning permission;
- new Permitted Development Rights to change a C3 Use Class (residential accommodation) to a C5 Use Class;
- flexibility for homeowners to let out their home for a number of nights per year (consultation on 30, 60 or 90 nights per year).

Questions and concerns raised by Members included:

- Clarification was sought on the impact on the hospitality sector. Members were advised that the consultation came about from concerns raised about the housing stock and was not related to potential competition.
- A concern was raised that if implemented this could be expensive and a lot of work for the council to adopt. In response the Assistant Director – Planning Strategy and Development Management confirmed there would have resource implications and a burden on the council. It was advised that the suggested alternative planning approach to make the permitted change from C3 to C5 subject to a prior approval process would be better. This would still not be ideal but would at least generate an income for the council to help cover the administrative cost of dealing with the issue and negate the need for an article 4 direction.

RESOLVED:

That the assessment and the detailed responses to the Government consultations on short-term lets that are set out in the report be noted.

Attendance List

Councillors present:

B Bailey
K Blakey

B Collins
O Davey (Chair)
P Fernley
C Fitzgerald
P Hayward
M Howe (Vice-Chair)
B Ingham
D Ledger
Y Levine
T Olive
H Parr

Councillors also present (for some or all the meeting)

I Barlow
P Faithfull
G Jung
M Rixson

Officers in attendance:

Ed Freeman, Assistant Director Planning Strategy and Development Management
Damian Hunter, Planning Solicitor
Wendy Harris, Democratic Services Officer

Councillor apologies:

J Bailey
M Hartnell

Chairman

Date:

Report to: **Strategic Planning Committee**

Date of Meeting: Friday 21st July 2023

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



East Devon Local Plan 2020-2040 Consultation Draft – Consultation feedback

Report summary:

This report seeks to set the scene for the appended full feedback report on the draft local plan consultation. The report highlights the numbers of comments received and the main issues raised. The report does not attempt to respond to the comments received and make recommendations about how the plan should be amended as this will need to be considered in detail at future meetings of the committee. The views of the committee are however sought on how they would wish to progress with considering the comments and responding with options set out within the main body of the report.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That Members note the draft local plan consultation feedback report;
2. Members views are sought on the issues highlighted in paragraphs 5.3, 5.4 and 5.5 of the report so that officers can develop a revised timetable for plan production and understand how Members wish to receive reports on changes to the plan.

Reason for recommendation:

To highlight to members key themes raised in feedback on the draft local plan consultation.

Officer: Ed Freeman – Assistant Director, Planning Strategy and Development Management,
e-mail – efreeman@eastdevon.gov.uk, Tel 01395 517519

Portfolio(s) (check which apply):

- Climate Action and Emergency Response
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Democracy, Transparency and Communications
- Economy and Assets
- Finance
- Strategic Planning
- Sustainable Homes and Communities
- Tourism, Sports, Leisure and Culture

Equalities impact Low Impact

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Climate change Low Impact

Risk: Low Risk;

Links to background information

The consultation draft local plan from November 2022 and other local plan papers can be viewed at:

[Draft Local Plan Consultation - East Devon](#)

[Initial feedback report on consultation on the Draft East Devon Local Plan, SPC, 7 March 2023](#)

Links to other background documents are contained in the body of this report.

Link to Council Plan

Priorities (check which apply)

- Better homes and communities for all
 - A greener East Devon
 - A resilient economy
-

1. Introduction

- 1.1 Strategic Planning Committee will be aware that we consulted on a draft East Devon Local Plan starting on 7 November 2022 and ending on 15 January 2023. This committee report provides summary details on the consultation. The consultation feedback report is appended to this report.
- 1.2 It is stressed that the feedback report does not seek to comment on every matter raised in all responses, to do so would result in a much longer report (even with summaries it's still very long). But the feedback report does go into some detail on matters raised and in so doing it seeks to provide a measure of the nature and scale of responses and some of the technical detail that respondents raised.
- 1.3 The consultation feedback does not provide officer commentary on or suggested responses to comments made nor do we provide any recommendations in respect to how Committee could react or respond or future actions that we (as officers) suggest committee may wish to take. These will however need to be debated by the committee in future meetings.

2. How consultation was undertaken

- 2.1 The consultation was based around a draft version of what (with some omissions) a final local plan could look like. At this stage we are at the Regulation 18 – Preparation

of a local plan – stage of plan making and the regulations we work to [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk) are quite open-ended in respect of the consultation that is undertaken and the shape and form that it may take. The regulations are also open-ended in respect of the number of events that may be held. It was, however, considered desirable to consult on a document at this stage that was close to being a full plan and one that was set out in a format that a final plan, as may be submitted for Examination, could take.

- 2.2 It should be noted that at this stage of work, and bearing in mind that it was a consultation draft, the plan can be amended and adjusted in the light of responses received in any way that committee see fit. Albeit Committee must be aware of legislative, regulatory and procedural requirements that exist, that will need to be complied with in order to receive a report from the planning inspectorate that advises that the plan can be formally adopted. In this context taking into account Government policy will also be critical.
- 2.3 The draft plan was available on-line allowing for the direct submission of comments. The Council used a software platform called Commonplace that was utilised for local plan consultation and the plan was also available in pdf format for people to comment in letters and emails. We held nine public exhibitions at various venues across East Devon to support the consultation. These were well attended with around 200-300 people attending most events. At the exhibitions people were able to submit written comments on slips of paper – these are summarised in the feedback report.
- 2.4 There were responses from around 2,500 respondents through the Commonplace on-line software and around 1,000 separate emails or letters were received and there were also a number of petitions that were received (as opposed to stand alone letters or emails) signatories to petitions are not counted in these numbers (they would therefore be an addition).
- 2.5 There were a number of concerns expressed about the Commonplace software, its accessibility, cookie consent etc. though it is considered that the fact that 2,500 responses were received through commonplace speaks for itself. It is worth noting that it appears that our Local Plan consultation was the biggest and most complex consultation hosted by the platform up till now and there are certainly lessons to be learnt from this experience. The comments received on the software have been passed to its providers who are constantly working to improve the system. It is considered that it was the best platform for the purposes of the consultation being run but with future consultations under regulation 18 likely to be more focused and the regulation 19 being quite different in terms of the requirements of the legislation it will be appropriate to review whether it would be the most appropriate platform for hosting future consultations. It is proposed to do this at the time of those consultations with Members asked to consider a consultation strategy alongside the consultation materials as they were asked to do with the draft plan consultation.
- 2.6 In terms of the issue of cookie consent Members may recall that there was some concern that consent was not requested as part of the consultation pages. It is understood that the regulations are slightly ambiguous as to whether consent should

have been required in the circumstances of this consultation. The issue was however raised with the Information Commissioner (ICO) and the advice was that no data breach had occurred. The data that was collected through cookies was very limited and anonymised and not accessible to us. It is understood that the default setting for EDDC consultations on commonplace will now be that cookie consent is requested to avoid concerns being raised with any future consultations through the platform.

2.7 We have not kept a formal log of time taken to undertake the consultation work but would stress that it is time intensive. Since the beginning of 2023 (i.e. after the main consultation events, including when exhibitions were concluded) it is estimated, however, that officers of the Council have spent around 300 working days logging, recording, summarising and processing representations on the draft plan and allied tasks.

3. Overarching nature of consultation responses

3.1 Most people commenting on the plan were unhappy about one or more aspects of the plan, though there were some (limited) statements of outright or more typically qualified support (at least from some on specific aspects or policies). For comments submitted via Commonplace, policies on the environment, built heritage, and recreation saw most support. There was a general pattern of unhappiness for all sites, whether shown as preferred allocations, second choice, or rejected. Some sites received just 1 or 2 responses, whilst site Brcl_12 in Broadclyst has the most responses at 403.

3.2 Proposed land allocations for development came in for the greatest level of criticism with nearly all sites proposed as allocations coming in for at least some objections. There were very large numbers of objections to some of the proposed allocations, in some cases with organised campaigns established to coordinate responses.

3.3 Larger sites tended to see larger levels of objection with the principle of a proposed new town east of Exeter being a specific case where objection numbers were particularly high. The plan consulted on three possible site options for a new town and there were matters also raised in objections to each separate option. It should be noted, however, that there were some respondents, specifically including from members of the public, that favoured new town development (though it is presumed that few (or less) of those in support live in close proximity to the site options).

3.4 Whilst responses from the public out-numbered responses from those promoting land for development there was feedback from land owners and specifically agents acting for them. These included qualified support from those favouring development at proposed allocation sites and also objection where the plan did not allocate specific land or sites for development. As well as more general comments agents typically made a number of technical observations (often cross-referencing to Government policy) around policy detail and wording.

3.5 We also had feedback from a range of amenity and environmental groups and bodies (and the like) and from a wide range of public sector bodies and organisations as well

as from service and infrastructure provider companies and bodies. These organisations include Devon County Council, the Environment Agency, South West Water, NHS and many town/parish councils. Many of these related to technical issues and matters as well as to infrastructure capacity considerations.

- 3.6 Generally we have not specified in the feedback report who has made particular comments or observations (this is particularly so in respect of comments from the general public). However, we do give an indication in many cases of the nature of respondents and in some cases, especially so for public sector bodies and infrastructure or service providers, we do highlight who specifically has made some comments. This is seen as especially relevant where a body may have a legal duty or responsibility for or over a matter that they are making comment about.
- 3.7 We highlight, as well, that the feedback report covers the broad themes of feedback received, and some aspects of detail, but it should not be regarded as being the final Council review and concluding assessment of comments. We would envisaged that some responses will need to be revisited and assessed in greater detail as plan making progresses. This may be so where particular technical points of detail are raised in comments and these may be explored further and commented on and inform greater detail in future technical assessments and evidence documents.

4. Where to view consultation responses in full

- 4.1 As highlighted in this committee report, and in the full feedback report, we give a summary only, and one that is officer interpretation, of key themes emerging. It is stressed that to get a complete picture of all matters raised all comments should be read in their entirety.

Where people or organisations made contact via the Commonplace consultation portal their comments can be seen on the software platform at:

<https://eastdevonlocalplan.commonplace.is/>

The responses that came in, outside of Commonplace, i.e. that were sent in as emails or as paper copies or letters or petitions in the post and in respect of documents that were uploaded on to Commonplace (as opposed to be posted directly on the portal) can be viewed at:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/comments-made-during-the-draft-local-plan-consultation/>

- 4.2 It is also stressed that this consultation is just one, albeit a very large one, that has and may be undertaken under Regulation 18 of the plan making regulations. For a complete picture all other consultations and responses received should be reviewed.
- 4.3 It is stressed that we, as officers, have read every submission that we have recorded as received and, as officers, have sought to record and capture themes raised in responses in a balanced manner. Though clearly it is not possible to include in the

feedback report all actual words used in all submissions. In bringing any subsequent report or reports to committee there will be a time gap in which if anyone feels that we have unreasonably or inaccurately recorded feedback they can draw it to our attention and we can consider the case for making amendments (though we would stress that we are not suggesting any formal notification or consultation to undertake this work).

5. What happens next

- 5.1 Members of Strategic Planning Committee will need to resolve how they wish to see plan making progress and therefore in what manner they wish to see the consultation and feedback received from the draft plan consultation used to inform future plan making and local plan content.
- 5.2 We do, however, draw to committees attention that alongside the plan that is submitted (to the Planning Inspectorate) for Examination we also need to submit details of consultation undertaken (at this Regulation 18 stage of work), along with key matters raised and the Council response to these matters. Bearing this in mind we would envisage using the feedback report, and specifically the bullet pointed items, as a record of key matters raised. These bullet pointed items or more likely groups of bullet pointed items or a refined summary of main themes, will feature in a future report to committee. Against each bullet point or grouping there will be a need to establish how the plan should be changed or has been changed in response (or reason for not making changes) will be set out.
- 5.3 In terms of progressing work on the plan there are various options about how this could be done:
- One option would be to take the feedback report and respond to each point and alongside that produce a recommended next iteration of the plan for Members to review. This would give Members a comprehensive overview of all proposed changes at once but would take months of work for officers and then leave the committee with the entire plan to be reviewed all at once.
 - An alternative would be to work through the comments and the plan in sections, chapters or topic areas so that the work can be brought to the committee in parts over a number of meetings. This is likely to be more manageable in terms of workload for both officers and members but clearly there could be consequential changes from one section that impacts on another which could make it difficult to keep track of changes and lead to some flipping back and forth between sections. This could however be reconciled at the end of the process with a further iteration of the plan produced for oversight of how each section fits into the plan as a whole.

Members' views on these options are sought.

- 5.4 A further issue to consider is that Members had previously resolved:

“That Officers continue with the background technical work with regard to the Local Plan including discussions with consultees and other stakeholders and infrastructure providers in particular concerning water, sewerage and other environmental matters to

enable those discussions with infrastructure providers and stakeholders to continue but that no further discussions or decisions will be made with regard to the sites or their allocation until the Government has delivered the finalised NPPF.”

- 5.5 There is no sign of the revisions to the NPPF being published despite indications that this would happen in the spring (at the time of drafting this report we note a press reference to revision not happening until September at the earliest). With work on reporting on the consultation responses now complete work now needs to move forward on amending the plan in response to the feedback including the work on site allocations. Members will note that site allocation is a very controversial element of the plan based on the comments received. In developing a timetable and programme for progressing the plan it is important to understand whether the previously agreed pause on discussions on sites and allocations should continue in the absence of the updated NPPF.

Financial implications:

There are no direct financial implication contained in this report at this stage.

Legal implications:

There are no legal implications requiring comment.

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



PDF 1 of 10

Introduction

Pages 1-31

July 2023

Executive summary

Consultation on a draft East Devon Local Plan starting on 7 November 2022 and ended on 15 January 2023. Summary comments on responses received to the plan are highlighted in this feedback report but at this stage we do not provide comment on or suggest responses to issues raised. Consultation was based around a draft version of what (with some omissions) a final local plan could look like. Though it is recognised that more work needs to be undertaken on the plan and any aspect of the plan could change in response to comments received.

The consultation was supported by exhibitions and the plan featured on an online portal, where comments could be made directly, as well as documents being available in pdf format and people could comment by sending in emails and letters. We received comments from around 2,500 people and organisations through online channels and around 1,000 through letters and emails, there were also some petition received.

All of the policies in the plan were available for comment as well as sites that we had assessed as offering potential for built development. Most people commenting on the plan were unhappy about one or more aspects of the plan, though there were some (limited) statements of outright or more typically qualified support. Proposed land allocations for development came in for the greatest level of criticism with nearly all sites proposed as allocations coming in for at least some objections.

Larger sites tended to see greater levels of objection with the principle of a proposed new town east of Exeter being a specific case where objection numbers were particularly high. It should be noted, however, that there were some respondents, including from developers and some members of the public that favoured new town development.

Whilst responses from the public out-numbered responses from those promoting land for development there was feedback from land owners and specifically agents acting for them. These included qualified support from those favouring development at proposed allocation sites and also objection where the plan did not allocate specific land or sites for development.

A great many respondents highlighted that the Government may be making changes to the requirement to accommodate specified housing numbers determined through a standard, England wide, defined methodology. Many saw this as leading to an outcome where the Council should plan for lower levels of overall housing development.

Many of the comments received questioned the ability of existing social, community and physical infrastructure to meet existing population needs and people raised the concern that with additional house building, and an increased population, services would be further and unacceptably stretched. From many members of the public there was the view that levels of development, especially housebuilding, should be established at and by local communities and allied to this some expressed the view that existing (locally established) Neighbourhood Plans were not being followed.

Many responses questioned whether the houses being planned for development would meet a local need and allied to this was concern that new homes built would not be genuinely affordable and would encourage increased in-migration.

We also had feedback from a range of amenity and environmental groups and bodies and from a wide range of public sector bodies and organisations as well as from service and infrastructure provider companies and bodies. Many of these organisations commented on matters that were specific to their operational activities and roles. A theme in some comments received was that there was too much development concentrated in the west of the district and it should be more dispersed across East Devon, though some respondents favoured the concentration of development.

Whilst all policies in the plan came in for at least some comments there were some subject areas covered in the plan, notably around built and natural environment protection themes, that came in for higher levels of praise or support.

There were also comments that challenge the plan making process and democratic legitimacy of the work that had been undertaken and also some negative observations around the consultation exercise and the way the online consultation platform was used/worked.

There was the opportunity for people to comment on matters that the plan was silent about but respondents thought it should address or cover.

Over the coming months the feedback received will be assessed and plan refinement and redrafting will need to take place before moving onto subsequent stages of plan making.

Contents

Executive summary	2
Contents.....	4
Introduction	6
What is a local plan and why we are producing one?	7
The draft plan that was consulted on and the consultation software	8
The consultation strategy	10
The people that responded and a note on statistical validity	12
Where to view consultation responses.....	24
Policy by policy summary of comments received.....	25
General Comments on the plan – not recorded at policy specific	26
Chapter 1 - Introduction, evidence and policies.....	32
Chapter 2 - Vision and objectives	33
Chapter 3 - Spatial strategy	38
Chapter 5 - Future growth and development on the western side of East Devon	89
Chapter 6 - Strategy for development at Principal Centres, Main Centres, Local Centres and Service Villages	119
Chapter 7 - Tackling the climate emergency and responding to climate change	325
Chapter 8 - Meeting housing needs for all	357
Chapter 9 - Supporting jobs and the economy and vibrant town centres.....	392
Chapter 10 - Designing beautiful and healthy spaces and buildings	404
Chapter 11 - Prioritising Sustainable travel and providing the transport and communications facilities we need.....	412
Chapter 12 - Caring for our outstanding landscape	425
Chapter 13 - Protecting and enhancing our outstanding biodiversity and geodiversity.....	439
Chapter 14 - Open space and sports and recreation facilities	456
Chapter 15 - Our outstanding historic environment	463

Chapter 16 - Ensuring we have community buildings and facilities	468
Chapter 17 - Implementation and monitoring of the local plan.....	470
Chapter 18 - Have we missed anything?	472
Issues raised that are not necessarily directly relevant to the Local Plan	474
Responses to the Sustainability Appraisal	476
Conclusions and next steps	482
Appendix 1 - Feedback on comments on the Commonplace platform	483
Appendix 2 - Feedback from in-person submissions at the consultation events	485

Introduction

This report provides feedback on responses that have been received to the East Devon consultation draft local plan (autumn 2022), and the accompanying Sustainability Appraisal report. The draft plan was consulted on under Regulation 18 of the plan making regulations [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk). The consultation starting on 7 November 2022 and ending on 15 January 2023.

In this report we summarise, or in some cases quote directly, what has been said but **do not** seek to respond to points raised. Over the course of 2023 (and potentially beyond) more detailed assessment of matters raised may be undertaken and Strategic Planning Committee of the Council will need to determine appropriate policy responses in respect of any plan redrafting.

This report, by its very nature, can only give a ‘snap-shot’ overview and whilst every effort has gone into seeking to give a reasoned balance view of matters raised it is stressed that to get a complete understanding of all issues all comments should be read in their entirety.

What is a local plan and why we are producing one?

The local plan sets out policy to guide and regulate development. It will be the key East Devon District Council document that is turned to in respect of determining planning applications. In this respect it will be part of the Development Plan for East Devon, which will also include the Cranbrook Plan, any Made Neighbourhood Plans and the Devon County Council adopted minerals plan and waste plan. The new local plan, when adopted, is intended to supersede the existing adopted East Devon Local Plan which was adopted in 2016 and the East Devon Villages Plan which was adopted in 2018.

The Government establish national planning policy, in the form of the [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) (NPPF), with the most recent draft being published in 2021 and it advises at Paragraph 33 that:

“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary.”

The Council has undertaken a review and concluded that a new plan should be produced. It should be noted that the Government, following a consultation in early 2023, had advised that a new NPPF would be published in spring 2023. However, at the time of drafting this report the new NPPF had not been published. The Government are also making changes to planning legislation that could impact on future plan making work with these changes expected to come through in late 2023 and with another redrafted NPPF also potential going to be issued later this year.

The draft plan that was consulted on and the consultation software

The draft plan was prepared to reflect the shape, form and content of what could be a reasonable plan for submission for examination by a planning inspector, although there were some gaps in policy coverage that need to be addressed.

All matters in the plan were consulted on to promote comment and review. Nothing was, or is now, determined or fixed, and the comments we have received from feedback will be used to inform future drafts of the local plan.

The plan was produced as a printed document in pdf format along with pdfs of various maps (the Policies map) showing lines, boundaries and areas that policies apply to. To encourage engagement and feedback we also published the plan (most policies in full and summary commentary around policies) on a consultation software platform called Commonplace. This same software also had a mapping function that showed potential development sites that we sought feedback on as well.

The previous consultation, undertaken in 2021 on 'Issues and Options' was conducted online using ESRI StoryMaps (as a more user-friendly alternative to a standard PDF). This presented the information being consulted on and Granicus Firmstep was used to collect responses submitted online. Members were in favour of a more unified system for the consultation on the Draft Local Plan, which didn't involve switching between platforms to view information and then comment on it separately.

A corporate decision was made to invest in Commonplace, an online citizen engagement platform, for use across the entire Council, rather than a planning-specific consultation tool. Commonplace enabled the consultation to be presented in a more engaging and interactive way, that works equally well on a desktop computer as it does on a tablet or smart phone. Consultation material could be viewed and comments made within the same window (as requested by members).

Commonplace presented the draft plan by breaking down each chapter into a 'tile', within which users could read background information and the specific text of proposed policies. Users could then provide direct feedback by submitting a comment (with no word limit in place).

The same opportunity for feedback was given for proposed residential & mixed use land allocations and options for the proposed new settlement, which were accessible by a list (ordered in the town or village the allocation was located) or by the use of an interactive map.

The interactive map showed each of the proposed sites using a colour coded ‘traffic light’ system to show preferred allocations, second choice sites and also those that have been dismissed as an option at this stage. This enabled users to comment on all potential site options but also give respondents a clear indication of the Council’s preferred sites and strategy at this stage to inform responses.

JPEG maps (rather than an interactive map) were also provided on other areas which were part of the consultation (e.g. employment allocations, areas considered suitable for wind/solar energy, etc). There was also a ‘quick survey’ tile for people who did not have the time / inclination to comment on the entire document.

Issues and problems that were reported on

A number of online respondents struggled using Commonplace, with negative feedback including not being able to use the interactive map, frustration at each individual comment being acknowledged separately, confusion and annoyance over the use of emojis, difficulties in navigating through the tiles and using the platform overall, lack of clarity over whether comments had been successfully submitted/ documents uploaded and that the consultation seemingly excluded people who are not IT literate (even though the idea was that the web site was intuitive and simple to use).

A selection of the negative feedback received is presented in **Appendix 1** to this report.

Cookies and issues raised

An issue was also raised regarding the lack of a cookies/ privacy notice on the Commonplace web site and the fact that there was no upfront cookie consent request, which one respondent suggested was in breach of Privacy and Electronic Communications Regulations (PECR).

The Council and Commonplace were subsequently reported to the Information Commissioner’s Office (ICO) for a cookie consent breach, however, no action was taken.

There is some ambiguity in the regulations relating to cookie consent in the circumstances of the consultation; Commonplace informed the Council that they had contacted the ICO and advised them of the issue but the ICO responded that there was no need to inform them.

The consultation strategy

Consultation is a two-way process in which people are informed about the options available to them and are asked for their opinion on what is being considered. The Council wanted to ensure that communities in East Devon are aware of and able to comment on the topics which matter to them most.

In 2021, the Council ran a consultation on the Issues and Options concerning the next Local Plan. The overwhelming majority of respondents to the questionnaire were either in the 56-70 or 70+ age groups, and members advocated that more effort should be made to specifically seek the views of younger residents in the consultation on a draft version of the plan itself.

Many of the topics covered in the Draft Local Plan affect the district's younger residents, specifically including future housing provision and the lack of affordable homes – cost and availability of housing have been suggested as a major cause of both younger people leaving the area and the increase in the average age of an East Devon resident.

It was decided to set out a strategy including ideas on how we can better engage with the District's under 50s and, in particular, the 18-24 age group who do not traditionally engage in planning consultations.

Throughout the consultation, we utilised the Council's social media accounts to better engage with the younger demographic, including regular posts on Facebook and Twitter and the creation of topic-specific videos for YouTube. Members of the Devon Youth Council and East Devon representatives in the UK Youth Parliament were contacted to help publicise the consultation.

Additionally, online newsletters/updates were published throughout the consultation period, along with regular press releases being issued to the local media, adverts on the EDDC web site and online webinars for parish and town councillors. There were, face-to-face engagement events with the public, held in Whimple, Ottery St Mary, Axminster, Clyst St Mary, Sidmouth, Honiton, Exmouth, Feniton and Seaton; these events are covered in more detail elsewhere in this report. Some parish council and local community groups also organised their own events, such as a paper-based questionnaire organised by the Axminster Neighbourhood Plan Steering Group. A group proposing a new garden village at Greenhayes organised a separate online petition.

After a Local Plan introductory video was published on YouTube in November 2022, other video topics which followed included: Climate Change (published Dec 13th 2022; 172 views as

of Jun 6th 2023); and Housing (published Jan 19th 2023, 262 views as of Jun 6th 2023). Viewing figures were not as high as hoped.

Press releases were issued throughout the consultation period on topics such as: 'Will the new East Devon Local Plan help meet your housing need?', 'Could more be done to make new developments more environmentally friendly in East Devon?' and 'What do you think of proposals for a second new town in East Devon?' Local media outlets to cover the Local Plan included the Midweek Herald newspaper and the Nub News series of websites.

Criticisms of our approach included not directly contacting people who live near a proposed allocated site (in the way the Council would contact people living near an area affected by an actual planning application). However, the Local Plan impacts on everyone in East Devon and engaging with everybody that might have an interest in the plan and proposals within is very difficult. For example, we could have done a postal mailshot to every household in East Devon, but this would have been very expensive, and we query whether that would have been a good use of Council money. In the future, perhaps we should consider erecting a notice next to every site that we suggested as a possible allocation for development in the draft plan?

The people that responded and a note on statistical validity

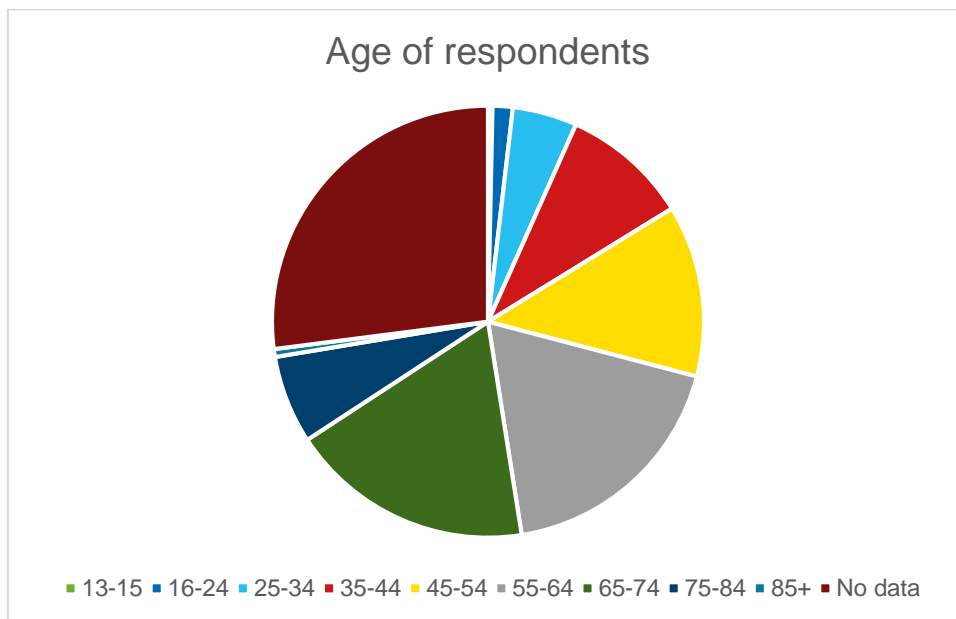
Through the consultation software we asked people to provide background information on where they lived, their age and whether they were responding as a private individual or in some other capacity. These questions were asked to understand more about the characteristics of those responding.

Most responses received, where people provided information (noting there was no obligation to do so) were from people that live in East Devon though there were also responses from other parts of the country as well, though many of these were from agents representing clients or from other bodies or organisations.

Of those respondents who answered the question ‘What is your connection to the area?’, 94.41% said they lived in East Devon with 2.98% stating that they worked in the district; other responses included that the respondent commuted through East Devon, owned a business in East Devon, studied in East Devon, volunteered in East Devon, was a consultee, a developer or a landowner.

Out of the respondents who stated where they live, 1,671 (94.03%) out of 1,777 lived in East Devon and 106 (5.97%) lived outside of East Devon; 602 respondents did not state where they lived.

The majority of respondents who provided detail about their age were middle-aged or older, with 56.75% of respondents aged 45 or above. Respondents aged 44 or under represented just 16.23% of those who took part in the consultation, with 27.03% not providing information about their age.



In-person consultation events

Early in the consultation period a series of in-person consultation events were held at accessible community venues across the District. This gave interested parties an opportunity to speak to Officers face-to-face, provided assistance with technical queries and ensured large scale maps and supporting information were available for viewing and discussion. iPads also enabled the consultation software to be explained and demonstrated, and feedback could be given during the events using the iPads, verbally or in writing using the short response forms provided, a summary of these responses is given in **Appendix 2** to this report.

Venues were mainly selected on the basis of being located in the main towns, close to public transport and town centres, but several events were also held in villages where proposals for substantial growth were under consideration. Where several villages in close proximity could be impacted by new town proposals, the most accessible location was chosen. Events were held during the afternoon and into the evening to maximise potential for attendance.

The events were well attended and generally well received. Attendees fed back that they appreciated the opportunity to view the proposals, although they didn't necessarily agree with them. A summary of each event is set out below.

Venue	The Guildhall, Axminster
Date, time	Thursday 1 st December 2022, 3pm until 7pm
Weather	Very cold, frosty and misty
Approximate number of attendees	150 – 200 The hall was very busy for the first three hours but much quieter for the last hour.

Demographic profile	Mostly older and middle aged people
Most frequent comments/questions	<p>Concern about the impact of housing levels on infrastructure, particularly roads, schools and health facilities.</p> <p>Concern that housing levels in Axminster were much higher than other East Devon towns.</p> <p>Concerns that no site notices had been put up to show allocations and that people had found out about plan and exhibition by accident.</p> <p>The majority of site specific concerns related to Axmi_02 and included lack of clarity about highway access, loss of beautiful green fields that people use for walking and potential impact on heritage assets.</p>
Other settlements	There were quite a few people from Chardstock who expressed concerns about the level of housing proposed in the village. The narrow lanes linking Chardstock to the main road, difficulties caused by school traffic along this route and general lack of infrastructure were the main concerns.
Other comments/questions raised	<p>Axminster has already had a lot of housing and relief road has not happened.</p> <p>Concerned about impact of development on water quality in River Axe.</p> <p>Concerns about traffic congestion in town centre.</p>
Any other comments	<p>Some people were reluctant to comment online and were pleased that there was an opportunity to complete a comments sheet at the exhibition.</p> <p>Axminster Town Council representatives and EDDC Councillors were also in attendance and were very helpful.</p>

Venue	Clyst St Mary Village Hall
Date, time	Friday 2 December 2022, 2pm until 6pm
Weather	Grey and cold but dry.
Approximate number of attendees	<p>Estimated at around 200.</p> <p>The exhibition ran from 2.00pm to 6.00pm with a steady flow of arrivals throughout the afternoon though numbers tailed off towards the end. People attending stayed for varying lengths of time with many around for longer durations.</p>
Demographic profile	Mostly middle and older aged, but later on (around 4.00pm through to 6.00pm) some younger people.
Most frequent comments/questions	<p>Most attendees were interested in and raised question and challenges around the proposals for the new community and the sites shown in the consultation draft plan. There was (not surprisingly) overarching opposition, in principle, to proposals for development of the new community and no clear pattern in comments or questions to suggest that any particular site was more or less favoured than any of the others. That said, Option 1 which as shown as a favoured site in the consultation plan, came in for more comments and challenges than the other site options with some attendees suggesting that it was inappropriate for a favoured option to be shown in the consultation and highlighting that assessment work was not clear cut in significantly favouring Option 1.</p>

Some attendees had seen presentations by land owners/agents that included masterplans of proposals and queried whether these formed part of the development proposals and part of the consultation (the answer to which is no and if proposals for a new community progress there will be Council led master planning work).

In challenges to the principle of the new community a number of people raised questions and concerns around the scale of proposed development and the degree to which it would overtly impact on and superimpose a significant urban form on what is currently a rural environment made up of small groups of dwellings.

A key theme coming forward in comments and questions related to the overall impacts on and ability of existing infrastructure to cope with additional demands and whether and when new infrastructure would be provided. The ability of the highway network to cope with additional vehicle pressure was high on many people's topic matters for discussion with many of the view that roads at the present time are inadequate with long queues for much of the day and pollution being a real concern. Attendees questioned the ability of the roads to cope with the additional vehicles the development would generate and whether, or if, roads could or would be upgraded. The traffic modelling in the CBRE assessment work came in for criticism with some suggesting it was inaccurate and it failed to take into account real life congestions nor to adequately address the real life impacts that future development would cause. There was some scepticism that new residents would do other than drive cars.

A wide range of further infrastructure capacity matters were also raised highlighting concerns over current capacity, the demands and needs new development would generate and if, when or whether new infrastructure would be provided. Provision of health and medical care, schools and sewage were amongst key matters raised. Many of the attendees questioned the overall need for the scale of house building set out in the plan overall with challenges relating to whether it was the (high) levels that generated and were the driver for the proposals for the new community. Some suggested that it came across as an easy answer to plan for a new community to accommodate the identified scale of housing, but there were better or alternative answers and options.

A number of attendees suggested that there were differing strategic choices or options that the plan should be pursuing. Some highlighting that they felt the overall amount of development the plan is accommodating is too high. There were also observations that rather than planning for a new community (close to Exeter) there should be other locations that should be looked at for more development, specifically including observations that development should be dispersed at higher levels more widely across the rest of East Devon.

Other comments/ questions raised	<p>There was some more general interest raised in questions around the plan, though in many cases, such as scale of housing provision, such considerations overlapped with challenges and queries around the new community proposals.</p> <p>Beyond the new community proposals there were some (though limited) questions raised about development elsewhere in the District including in respect of development at villages and sites shown in the draft plan as allocations or land that is not allocated in the plan.</p> <p>Some people raised the conflict with the recently ‘made’ Farringdon Neighbourhood Plan, and questioned the point of doing an NP if it is ignored by EDDC when preparing a Local Plan. It was suggested that EDDC Officers must have known about the potential for a new settlement in the area when the Farringdon NP was being prepared and if so, was this not/why was this not mentioned by EDDC to those preparing the NP?</p>
Any other comments	<p>The overwhelming number of questions raised and comments made directly related to the local plan, its status and timescales and proposals for work going forward. Some people raised concerns that there had been inadequate notice given for the exhibitions and that in the time available to make comment there was a significant amount of material to seek to take into account and that time constraints made in challenging or impossible to fully/properly review background material.</p> <p>There was also concern raised that developers and agents promoting sites and schemes for development were given the opportunity to do so to committee but those that did not consider the sites or potential approaches of the plan to accommodate development were not afforded the same chances.</p> <p>It was strongly suggested that a consultation event should have been held in Farringdon, given its proximity to the preferred option for a new settlement. It was also suggested that the event was held at an inconvenient time for those at work. Whilst many attendees expressed opposition to the new community proposals (in particular) there was a view that the event was to be welcomed and thanked council staff and members for being available to address matters raised and provide further information and comment.</p>

Venue	The Ocean, Exmouth
Date, time	Thursday 8 December 2022, 3.00 pm until 7:00 pm
Weather	Dry and sunny until sunset, but it was a cold day and a very cold early evening.
Approximate number of attendees	<p>Estimated at around 200.</p> <p>There was a steady flow of arrivals throughout the afternoon though numbers tailed off somewhat towards the end. People attending stayed for varying lengths of time with many around for longer durations.</p>
Demographic profile	Mostly middle and older aged, but with some younger adults, and some children with parents/guardians especially in the early evening.
Most frequent comments/ questions	Most attendees were interested in and raised question and challenges around proposals in and around Exmouth, there were comparatively limited questions and issues raised about sites or matters beyond Exmouth.

Most of the sites shown as proposed allocations in the plan came up in questions and criticism, but there were also questions raised about the appropriateness and suitability of Exmouth to accommodate growth (and the scale proposed in the plan) and also about the processes and procedures used to arrive at the proposals. In questions asked there were matters raised around the suitability of sites with landscape impact considerations being a particular matter of concern noting that one larger site allocation falls within the East Devon AONB. Amenity impact concerns also featured in questions relating to proposed allocations as did adverse nature conservation considerations.

In commenting on and relating to proposed allocation sites in the plan a number of questions and comments raised related to the suitability of Exmouth to accommodate growth and indeed whether the town could or should now be regarded as full. It was highlighted in some comments that the outer edges of Exmouth, where allocation sites and site options are generally located, fall some distance (up to 5 km) from the town centre (which is located very much in the south west of the town). It was also suggested that there was limited scope to attract new jobs to the town (particularly non-tourism jobs) and as such there is and would be through further housebuilding a mismatch between residential accommodation and employment opportunities, exacerbating the dormitory role of the town. There were, however, questions raised around employment allocations in the town.

Allied to the in-principle questions around growth at Exmouth there was considerable debate and questioning around infrastructure capacity at and to serve the town. Highway congestion was raised by many attendees with particular reference to roads, and their capacity, leading northwards from the town towards Exeter. Questions and challenges were also raised across a broad spectrum of matters to include health provision, school capacity, sewage capacity and policing. These related to if, when or how additional infrastructure would be provided or supplied.

Some attendees questioned the overall need for the scale of house building set out in the plan and related these to recent Government announcements around greater flexibility for planning authorities to plan for lower levels of housing growth. It was contested that East Devon District Council should be more pro-active in setting out a case for lower levels of house building in the plan.

There was some comment in questions asked about the lack or absence of engagement to date with local communities and bodies in plan making. It was highlighted by some that local bodies have extensive local knowledge and local community inputs should have been sought at the outset in respect of proposing land allocations for development and wider policy matters. It was highlighted by some that they consider that the proposals for Exmouth run counter to the Made neighbourhood plan for the town.

There were also some questions and comments around accommodating development in other locations in the rest of East Devon, with some respondents being of the view that there were more appropriate places than Exmouth to accommodate growth (more development at the new community was suggested as a better alternative to Exmouth growth).

Other comments/questions raised	<p>There was a range of queries raised that fall outside of the scope of the local plan with traffic congestion and speeding vehicles most commonly being referenced, but also concerns relating to new housing being unaffordable, even where defined as “affordable housing”.</p> <p>Beyond Exmouth there were comparatively limited questions raised about proposed development elsewhere in the District, though some proposed allocations sites at some villages were raised in comments as well as questions around the three possible new town sites.</p>
Any other comments	<p>The overwhelming number of questions raised and comments made directly related to the local plan, its status and timescales and proposals for work going forward. Whilst many attendees expressed opposition to site allocations at Exmouth there was a view that the event was to be welcomed and attendees thanked council staff for being available to address matters raised and provide further information and comment.</p>

Venue	Youth Centre, Feniton
Date, time	Tuesday 13 December 2022, 3.00 pm until 7:00 pm
Weather	Overcast and cold.
Approximate number of attendees	Estimated at around 100 to 150. There was a steady flow of arrivals throughout the afternoon though numbers tailed off somewhat towards the end. People attending stayed for varying lengths of time with many around for longer durations.
Demographic profile	Mostly middle and older aged, but with some younger adults, and some children.
Most frequent comments/questions	<p>Most attendees were specifically interested in proposals for Feniton and the conclusions from the site assessment work (as shown on the Feniton inset to the Policies Map). Linked to assessment of sites many attendees referenced and objected to the possible option of higher levels of development at Feniton with infrastructure capacity concerns specifically being noted. Flooding matters and sewage capacity were dominant themes raised by attendees in questions and comments.</p> <p>By way of context setting it should be noted that the inset map for Feniton shows a range of sites around the village that were submitted in ‘calls for sites’ and which have been assessed. One assessed site, land at Burland Mead, was classified as “Preferred”, it was coloured in green and is proposed as an allocation in the Local Plan for development. Some assessed sites were classified as “rejected”, they were coloured in red and are not proposed as allocations. And some were coloured in yellow/amber, they were classified as “second choice” but were/are not proposed as allocations for development in the plan as currently drafted. As drafted the plan, therefore, proposed smaller scale growth at Feniton.</p> <p>Many people raising questions and comments challenged the judgement and underlying assessment that had led to the classification of sites as “second choice” (the yellow/amber sites). The opinion of many was that they should have been</p>

	<p>recorded as “rejected” and that they are not suitable or appropriate for a second choice classification or for development. There were concerns that such matters as adverse landscape impacts and flooding impacts have not been appropriately taken into account in individual site assessments, whilst there was also the view that there was insufficient infrastructure in or at Feniton to support the individual or the collective impacts of development of the “second choice” classified sites.</p> <p>A number of those asking questions referenced the super planning appeal at Feniton from a number of years back and commentary and conclusions set out in the Inspector’s report. These conclusions were cited in comments made to argue a case for the unsuitability of sites at and around the village to accommodate development. It was noted that one site rejected at the appeal has been given a “second choice” classification and another a “rejected” classification. A third site at the appeal was granted consent and has been partly built-out, though this site, its lack of completion and flooding issues associated with it came up in questioning.</p> <p>Many attendees specifically raised concerns and issue around flooding in Feniton and the potential for new development to exacerbate or worsen existing problems. Such concerns were noted in the context of recent and scheduled works to alleviate flooding but some suggested they were to date unproven and incomplete and also would (if or when completed) only offer scope to address problems in some (specifically easterly) parts of the village.</p> <p>The one site that is proposed for allocation in the current draft of the local plan was generally supported (or at least accepted) as a site for development. However, some localised issues of trees at the site and their possible loss from development were raised as were concerns about the amount of housing that site development might accommodate (concerns of over-development were highlighted). There were also matters raised about sewage capacity at and around the site with existing problems of sewage rising into existing homes highlighted and concerns that further development would exacerbate these current problems.</p> <p>Some attendees questioned the overall need for the scale of house building set out in the plan and related these comments to recent announcements around greater flexibility for planning authorities to plan for lower levels of housing growth.</p>
<p>Other comments/questions raised</p>	<p>There was a range of queries raised that partially or more fully fall outside of the scope of the local plan with existing localised traffic congestion being one such concern (one that was suggested would be exacerbated by further development). More significantly, however, were concerns and challenges around the whole subject matter of flooding at the village, including whether flooding at the village was properly understood and alleviation measures have been appropriately identified and planned for. There were also questions around where responsibilities for actions in respect of existing flooding should lie and whether works that should have previously been built may exist, are appropriate and are operational, and in indeed where responsibility for assessing and managing these lie.</p> <p>Beyond Feniton there were some, but comparatively limited questions raised about proposed development elsewhere in the District, though there was some debate around development at Ottery St Mary and some villages close by and also interest in the new town proposals.</p>

Any other comments	<p>The overwhelming number of questions raised and comments made directly related to the local plan, its status and timescales and proposals for work going forward. Whilst many attendees expressed opposition to site assessments and a possible outcome of larger scale growth at the village there was a view that the event was to be welcomed and attendees thanked council staff for being available to address matters raised and provide further information and comment.</p> <p>Some people mentioned that the Commonplace consultation software was difficult to use.</p>
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Venue	The Beehive, Honiton
Date, time	Wednesday 7 December 2022, 3pm until 7pm
Weather	Grey and cold but dry.
Approximate number of attendees	<p>150.</p> <p>The exhibition was advertised as running from 3.00pm to 7.00pm, however there was an influx of people from 2.40 when staff opened the doors in order to help an attendee with mobility requirements and noticed a crowd of people filling the corridor. After an initial very heavy influx of visitors, there was a steady flow of arrivals throughout the session. The room was 'full' of attendees for the first two and a half hours (to the extent that it overflowed into the corridor), and quieter for the last hour. People attending stayed for varying lengths of time with most staying at least 10 minutes and a significant number staying for over half an hour.</p>
Demographic profile	Mostly older people with some middle aged. Only a few younger people (under 30) and 4 children (0-16).
Most frequent comments/questions	<p>The impact of additional housing on infrastructure – schools (primary and secondary) and the GP are already at or over capacity. How will these facilities cope with the extra houses proposed in the Local Plan?</p> <p>The impact of additional surface water run-off from Honi_01 on houses in the Heathpark estate which have suffered flooding in recent years and now cannot/find it hard to obtain insurance cover. This included concerns re the gully which is overflowing and not maintained</p> <p>Lack of details re the access to the sites to the west of the town. Concern that access would be via narrow country lanes, through an existing housing estate or through the industrial estate.</p> <p>Objection to encroachment into the AONB and that circa 80 houses is not 'minor' as per the NPPF guidance</p> <p>Sewage is at capacity and already backs up in some houses</p>
Other settlements	A group of people from Upottery attended to object to the lack of new housing allocations in the village and its categorisation as 'unsustainable'.
Other comments/questions raised	<p>Honiton has grown hugely over the last few decades – why does it need more housing when the infrastructure is so poor?</p> <p>What is happening re sports pitch provision?</p> <p>Why hasn't Gittisham been consulted properly when the housing is in that parish?</p>

	<p>The site to the east of the town will abut older persons' park homes. Families will detract from their amenity</p> <p>The maps do not accurately reflect the extent of flooding</p> <p>Will the numbers be revised in light of the Government statement</p>
Any other comments	None

Venue	The Institute, Ottery St Mary
Date, time	Wednesday 30 November 2022, 3pm until 7pm
Weather	Grey and cold but dry.
Approximate number of attendees	200. The exhibition ran from 3.00pm to 7.00pm with a steady flow of arrivals throughout this time. The room was 'full' of attendees for the first three hours, and quieter for the last hour. People attending stayed for varying lengths of time with many around for longer durations.
Demographic profile	Mostly older people with some middle aged. Only a few younger people (under 30).
Most frequent comments/questions	The impact of additional housing on infrastructure – schools (primary and secondary) and the GP are already at or over capacity. How will these facilities cope with an extra 288 houses proposed in the Local Plan? Similarly, there were concerns that the road network in Ottery is inadequate as it is largely served by small, narrow roads.
Other comments/questions raised	<p>Ottery St Mary has already had its 'fair share' of new housing – why does it need more?</p> <p>The site off Strawberry Lane (LP_Otry_10 and LP_GH/ED/27) feels remote and would have an unacceptable landscape impact.</p> <p>What is happening to Tipton St John primary school given it frequently floods. Would prefer for it to stay within the village.</p> <p>Southern part of LP_West_04 in West Hill is subject to flooding and is home to bats.</p>
Any other comments	None

Venue	Gateway, Seaton
Date, time	Thursday 15 December 2022, 3pm until 7pm
Weather	Grey and cold but dry.
Approximate number of attendees	200. The exhibition ran from 3.00pm to 7.00pm with a steady flow of arrivals throughout this time. The room was 'full' of attendees for the first three hours, and quieter for the last hour. People attending stayed for varying lengths of time with many around for longer durations.
Demographic profile	Mostly older people with some middle aged.

<p>Most frequent comments/ questions</p>	<p>Concern on the impact of additional housing on infrastructure in the town, particularly the GP and primary school. Seaton has already met its Local Plan housing requirement, so why is more needed? Similarly, why are you doing a new Local Plan now, given the current one goes up to 2031? Sites on northern edge of town should be rejected as located in green wedge. Also adverse impact on bats. LP_Seat_05 was dismissed at appeal a few years ago, so should not be allowed to go ahead. Why is there a need for more housing? The Govt has removed housing requirements, so do we still need these houses?</p>
<p>Other comments/ questions raised</p>	<p>New development will have an adverse impact on flooding – the underlying geology is not suitable for sustainable drainage systems. How will access be obtained to LP_Seat_02? Cannot trust developers to deliver good quality development, as they often renege on affordable housing and other contributions. Colyford Road is already busy/dangerous, and LP_Seat_05 would make this much worse. Unhappy that the hospital has closed – what is happening to this? House prices are too high – even “affordable housing” is not affordable to most. What does the Coastal Preservation Area designation mean? How did you come up with the sites initially? When will the sites be built? Questions on the impacts on Colyford from Seaton related development and some questions around allocation sites and rejected options in Colyton.</p>
<p>Any other comments</p>	<p>What is the green pipe currently being buried along the northern edge of LP_Seat_03?</p>

Venue	Sidmouth
<p>Weather</p>	<p>Cold clear</p>
<p>Approximate number of attendees</p>	<p>120 The exhibition ran from 3.00pm to 7.00pm with a steady flow of arrivals throughout the first part of the afternoon. Quieter than other events. Last 2.5 hours had very few visitors. People attending stayed for varying lengths of time with many around for longer durations.</p>
<p>Demographic profile</p>	<p>Middle age and older in the main. A few younger individuals.</p>
<p>Most frequent comments/ questions</p>	<p>Need for infrastructure to be in place first before development is planned: Roads, sewage, surface water, access to services (doctors / dentist etc). Concern over new town and increased congestion / foul water.</p>

Other comments/questions raised	<p>Requests to push back to Government on housing figures.</p> <p>Requests to address second home ownership through policy / taxation.</p> <p>Cycle lanes and sustainable transport should be prioritised.</p> <p>Multiple requests that the park and change scheme be considered at Sidm_01.</p> <p>Criticism that this wasn't included in the plan for public consultation.</p> <p>Concerns over limitations restricting the extension of affordable homes in Policy.</p> <p>Question over the proportion of specialist older person dwellings proposed on allocated sites in Policy 41.</p> <p>Queries regarding the settlement boundary methodology / detail.</p> <p>Several raising concern over future of Budleigh Salterton community hub which occupies a preferred allocation site, and various concerns over sites (allocated and rejected) at Sidbury, including re. traffic issues through this village.</p>
Any other comments	Lack of concern over the preferred sites in general. Low turnout attributed to the small scale of the proposed allocations in the Sidmouth context.

Venue	The Victory Hall, Whimble
Date, time	Tuesday 29 November 2022, 1630 hrs until 2030 hrs
Weather	Grey and cold but dry.
Approximate number of attendees	150 - 200. The room was packed with attendees for the first three hours, and quieter for the last hour. People attending stayed for varying lengths of time with many around for longer durations.
Demographic profile	Mostly older and middle aged people.
Most frequent comments/questions	<p>Concern about the impact of additional housing on infrastructure in the village, particularly the road network.</p> <p>Many queries about the level of housing proposed and whether all the 'second' choice sites were to be allocated.</p> <p>Don't want Whimble to merge with Cranbrook.</p>
Other comments/questions raised	<p>There were several people concerned about the scale of allocation proposed in Broadclyst (Brcl_12).</p> <p>Several people were interested in the new settlement proposals and concerned that an exhibition had not been arranged in Farringdon Village Hall.</p>
Any other comments	<p>Whimble was the first exhibition held. Paper comment slips asking people how many homes should be built in Whimble (from a selected range) were made available and some people added additional comments, but the more general comments slip used in subsequent exhibitions was not available.</p> <p>One person praised the site selection methodology.</p>

Where to view consultation responses

Responses to the consultation can be viewed on the Council web site with contact details redacted, where appropriate, and to accord with our privacy standards. In a very limited number of cases selected text has been redacted where it was considered that it could be read as racist, slanderous or otherwise unacceptable.

Where people or organisations made contact via the Commonplace consultation portal their comments can be seen on the software platform at:

<https://eastdevonlocalplan.commonplace.is/>

The responses that came in, outside of Commonplace, i.e. that were sent in as emails or as paper copies or letters or petitions in the post and in respect of documents that were uploaded on to Commonplace (as opposed to be posted directly on the portal) can be viewed at:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/comments-made-during-the-draft-local-plan-consultation/>

Policy by policy summary of comments received

This section of this report provides a policy-by-policy summary commentary of key matters raised by respondents to the consultation. In some cases, policies in the plan specifically allocate sites for development and some sites will be referenced in this section of the report.

We start by highlighting some more generic issues and matters raised in consultation responses.

In providing a summary of comments made we have not typically sought to attribute comments to specific individuals or organisations. However, we have made certain exceptions where, for example it is a government agency or body or other organisation which undertake or have specific roles defined in legislation or Government policy/guidance that address key planning matters. In selected other cases we also highlight where a body or organisation has made comment, especially on specific technical points, we do so because we felt it would be beneficial for readers of this document to know who has raised a given issue. Most comments made and reported on were submitted by individual members of the public.

It is reiterated that we provide a summary of comments only and for a full picture all comments should be read in their entirety.

General Comments on the plan – not recorded at policy specific

This section of this document highlights a number of general comments about the plan and processes applied that are not necessarily specifically about any chapter of specific plan policy.

Comments about the need for a plan

The Council has determined that there is a need for a new local plan but some respondents questioned this by raising the following points:

- Several people noted that the current local plan has an end date of 2031 and felt that a new plan should not be produced until this end date.
- In noting the end date of the current local plan, it was suggested in some comments that the intent/aspiration behind the Council producing a new plan is to see/support significant extra levels of new development.
- In the context of opposing production of a new local plan (now) some respondent's highlight that many neighbourhood plans are in place (Made) and a new local plan should not be produced as it would supersede neighbourhood plans that were voted for through in a referendum.
- A challenge was raised that we should not plan for 15 years into the future, rather decisions should be taken in the context of needs at any given time.
- Neighbourhood planning process was seen to be too convoluted for smaller parishes that may wish to develop and grow.

Comments about data in the plan

- The local plan draws on data and information to inform and justify policy. However, some data was challenged.
- There was a concern raised that (some) data used in the plan is out of date, particularly the use of 2011 census data.

Comments about democratic process and engagement

Some respondents challenged the democratic legitimacy of the plan, plan making process and plan content. Comments received included:

- Consultation is a pretence to give local people a say, this will not actually happen.

- Council has failed to consult with towns and villages prior to the draft version being issued.
- A specific concern was raised that there was not a local plan meeting held in Farringdon village hall.
- Concern was raised that there was a failure to consult with villages and towns ahead of producing the draft local plan, including on The Role and Function of Settlements report and this was contrary to/undermined neighbourhood plan work.
- EDDC should ask parish/town councils how many new dwellings they feel would benefit their communities.
- Concern was raised that there should be far more on the ground consultation with people local to an area around their needs.
- Concern was raised that the plan is developer/development led and is about ‘developer profiteering’.
- There was a call for the publication of names of the landowners who responded and how much of the land they have "offered" is allocated as well as those that have lobbied for development.
- A respondent advised that mapping was unclear as features such as AONB boundaries and SSSIs were not clearly depicted.
- Concerns that plan making processes have not been transparent with non-public discussions (specifically on new town options).
- The consultation contains leading questions which are not ideal for gathering objective responses.
- Why are acceptable sites coloured green on green – not very accessible.
- Consultation website was difficult to use and navigate and crashed at times.
- Much of consultation time was over Christmas and New Year.
- In future anyone who stands to be directly affected by a matter like a change to a Settlement Boundary should be advised personally and in writing about this before a formal consultation begins.
- Devon and Cornwall Police were disappointed that none of their comments made on the Issues and Options consultation have been incorporated into the Draft Local Plan.
- Drawing settlement boundaries to include development sites is pre-emptive and unfair.
- All householders potentially affected by the new settlement options should have received letters to notify them of the consultation.

Relationship with Neighbourhood Plans

Throughout the consultation responses there were lots of comments that were about and related to neighbourhood plans. Key matters raised included:

- It was positive to see that communities active currently in emerging Neighbourhood Plan preparation or with a 'made' Plan were able to draw on this work to inform preparation of responses to the Local Plan consultation. For example, in Axminster where a questionnaire was organised by the Neighbourhood Plan Steering Group and in Whimble where representations were informed from results of recent Neighbourhood Plan community consultations.
- There were also some positive comments about the draft Local Plan in relation to preparation or implementation of Neighbourhood Plans. These included that Neighbourhood Plans had been positively referred to in the draft Plan and noting that various strategic policies lent in-principle support that should further Neighbourhood Plan aims/policy objectives, such as relating to delivering a mix of housing types including self-build, creation of active travel routes, and potential for supporting valued views identified in Neighbourhood Plans through proposed policy on Areas of Strategic Visual Importance.
- In general, however, many respondents felt that their Plans/work on preparing them had been ignored in the emerging Local Plan, and some questioned the value of having produced a Neighbourhood Plan. This was particularly the case where their community had a Neighbourhood Plan relatively recently 'made' and/or where there are significant conflicts with the emerging LP proposals. It was even considered inappropriate by some respondents for a new Local Plan that would supersede made Neighbourhood Plans to be produced at all, and/or for it rely on the Government's standard method for calculating housing needs, given the number of 'made' neighbourhood plans which have all been subject to democratic vote in community referendums.
- Overall, the extent of conflicts between Neighbourhood Plans and the emerging Local Plan, and the 'policy blind' approach taken, was a recurring cause for concern/criticism regarding the Local Plan process so far. There were numerous calls for Neighbourhood Plans to be taken greater account of. Conflicts identified of particular or common concern included those arising from: options for a proposed new community; newly proposed or changed settlement boundaries; sites proposed for allocation at odds with Neighbourhood Plan policy to prevent settlement coalescence and retain rural character, and; the role and function of settlements in the proposed settlement hierarchy. Neighbourhood Plans highlighted through the representations where conflicts / potential conflicts were felt to be particularly significant included Broadclyst, Budleigh Salterton, Clyst St George, Colyton, Exmouth, Farringdon, Lymptone, Ottery St Mary & West Hill, Otterton, Sid Valley.
- Responses suggested that growth aspirations expressed in Neighbourhood Plans should fundamentally inform how much development should take place at given settlements and as such should inform the Local Plan strategy. Sites being contrary to / not supported by Neighbourhood Plan policies (or current Neighbourhood Plan preparation) was a common reason cited for not supporting their allocation in the Local

Plan. In particular, there were calls for sites outside existing development boundaries not to be allocated if contrary to neighbourhood plan policy. It was also expressed by some that neighbourhood plans would be the best route to determine new development sites, particularly for smaller scale development and for specific types of housing needed (especially affordable housing and smaller homes), and that communities should be able to bring to bear the power of Neighbourhood Plan.

- Where sites are to be allocated in the Local Plan going forward, there was a request to ensure that these are required to be developed in accordance with Neighbourhood Plan policy requirements where these exist. There was also a desire to see policies in made Neighbourhood Plans translated / incorporated into (or referred to in) Local Plan policy, for example, regarding Green Wedges, Local Green Spaces and other green / recreational space designations, local wildlife sites, local heritage assets etc.
- On the work still to be done highlighted in Local Plan Strategic Policy 3 regarding setting housing requirements for all of our Designated Neighbourhood areas, there was some support expressed for this in principle and for the intention to consult on the methodology. A plea was made that the figures set be realistic to help avoid speculative development in unsuitable locations. There was however also some criticism/concern about this forthcoming work area about the draft Local Plan allocations having already pre-judged local requirements. Going forward it was advocated that local town and parish councils should be asked about many dwellings would benefit their communities, and for consideration of the required housing type(s) and target market(s), and for the Local Plan to work alongside Neighbourhood Plans to encourage small pockets of organic growth for appropriate dwellings.
- Overall there was therefore significant concern about the emerging Local Plan and what it means for neighbourhood plans in the district and an expectation for further detailed consideration of the relationship and consultation with those communities.

Duty to cooperate

- Exeter City Council highlight the importance of the Duty to Cooperate and joint working. They highlight the need for a Statement of Common Ground to address the following:
 - The collective strategic response to the climate emergency
 - Development strategy and cross boundary development impact mitigation
 - The partnership approach to mitigating development impact on European sites
 - Landscape setting
 - Employment strategy
 - Transport strategy
 - Education strategy
 - Community facilities (health, education and cultural infrastructure)
 - Flood risk and coastal change management.

- Exeter City Council highlight the Joint Strategy for East Devon, Exeter, Mid Devon and Teignbridge as setting an overarching common approach that will address some Duty to cooperate matters.
- Comments on behalf of landowner interests state that the plan has not considered whether neighbouring authorities can meet their development needs so plan cannot be found to be sound. It is further commented that Exeter City Council's position that it can meet its own development needs is incorrect because this relies on building on high performing brownfield employment land that is undeliverable. It is considered that this will result in East Devon having to accommodate a significant proportion of ECC's development "needs". It is concluded that East Devon is failing in its Duty to Cooperate, to responsibly and sustainably identify and allocate the most appropriate land for development and that further work must be done to ensure that development is delivered in the most sustainable locations around the Exeter area (irrespective of whether it's in EDDC, TDC, MDDC or ECC).
- Comments on behalf of a site promoter in Axminster query the extent of land available to deliver homes in Exeter, the statements made in the urban capacity assessments, and whether this is realistic. They think that EDDC will need to consider an uplift in housing numbers to accommodate some of Exeter's need, or at least to have a contingency in place to react if that becomes clearer over time.
- Exeter Cycling Campaign point out that some of Exeter's Park and Ride proposed sites are in East Devon

Presentation of the local plan

- The Devon Wildlife Trust welcomes photographs in the plan and advises that they should aim to show good integration of semi-natural habitats into developments, with a diversity of habitats included. Habitats such as woodland, wetlands and heathlands are part of the wider East Devon landscape and should be fully integrated within developments. They say that Figure 7, showing new housing at Cranbrook, provides a poor example of green space within new development, with green space limited to tightly mown grass and the occasional non-native shrub.
- The documents are bland, difficult to follow and use a highly bureaucratic formulae making it very difficult for ordinary folk to review - an index to find references to specific villages would be helpful.

Start date, end date and Legal issues related to the plan

- The Avenues Residents Association (Exmouth) consider that, as we are now in 2023, the plan cannot have a start date of 2020, it should reflect, start at, the year of adoption. It considers this to set a dangerous and possibly illegal precedent that appears to imply

that EDDC will use whatever the final form of the LP is to back-date any changes to the new Plan versus the preceding Plan. They believe the current timetable for reviewing the draft plan should be suspended pending clear guidance on changes from the Secretary of State and suggest that, not to do so, would leave the Council vulnerable to legal challenge.

- Some developers anticipate delay in the Local Plan's plan-making process and conclude that the end date of the plan period should be extended by up to two years i.e. to 2042 so that the plan is providing 15 years from adoption.
- In not insisting on solar panels on new houses The Avenues Resident Association assert that EDDC exhibit a supine approach when dealing with developers and rarely show the moral courage to go to court in defence of what is right.

MP's comments

- Simon Jupp, MP for the East Devon constituency, submitted comments in which he notes and highlights concerns raised by a number of his constituents (across parts of the eastern side of East Devon) about:
 - the planned overall scale of development;
 - the principle of development at specific settlements; and
 - the suitability of certain listed sites for development.
- The matters raised by Simon Jupp MP, as reported to him by constituents, are reflected in comments on the plan as recorded in this report (elsewhere/further on). It is highlighted as well that Simon Jupp MP raises concerns around a large proportion of the planned housing growth falling on/towards the western side of East Devon with much less to the east.

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



PDF 2 of 10

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 EDDC 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'

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



PDF 3 of 10

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

Pages 119-212

July 2023

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

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

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

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

General comments on Chapter 6

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

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

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

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

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

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

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

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

Axminster Neighbourhood Plan Survey

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

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

- Housing Allocations – The Steering Group believe allocating a further 1,050 dwellings is disproportionate to the town’s ability to absorb new residents and is out of proportion to what is planned for other East Devon towns. The vast majority of respondents agree with the Steering Group, although one person commented that a Tier 2 settlement should be prepared for growth if supported by infrastructure, services and facilities.
- GH/ED/79 - principle of development accessed from Lyme Road without relief road is acceptable. A majority of respondents supported this view, but some did not, citing the lack of a relief road, flooding and highway safety as concerns.
- GH/ED/80a - The Steering Group commented that providing effective flood mitigation will be difficult and access from Sector Lane would be unacceptable. It felt that the closure of Sector Lane proposed through the relief road would be impractical and the steep slope would make pedestrian and cycle access difficult. All but one respondent agreed with several expressing concerns about flooding and highway access.
- GH/ED/82 - concerns were raised about the additional HGV traffic on Weycroft Bridge and impacts on the adjacent stream together with the need to manage the relationship with the important group of listed buildings to the north. The vast majority of respondents agreed with the comments and even those who said they did not commented on additional traffic congestion, pollution, flooding, archaeological impact and potential impacts on listed buildings.
- GH/ED/83 - land south of Tiger Way should not be allocated for housing but may be suitable for food retail to ease town centre congestion and serve local residents better. Land north of Tiger Way is less suitable for development because of its distance from the town centre. Respondents generally supported these comments, but some did not support any kind of development.
- Axmi_01a – was considered to be suitable for employment. This was largely supported, although a respondent queried what sort of employment would be provided.
- Axmi_02&08 – Sites are considered to lie beyond a clear natural boundary and could lead to more housing beyond if developed. Safe pedestrian access to Musbury Road cannot be provided and accessing the town via Wyke Lane involves steep slopes and a long walk so future residents would be car reliant. The sites form attractive countryside visible from the AONB, good agricultural land and well used for recreation. Most respondents agreed.
- Axmi_07 – allocation of site welcomed are would be preferred for higher density housing rather than employment. Consideration should be given to improved pedestrian/cycle links across the site and a road connection from the by-pass slip road to the train station. Only one respondent expressed a contrary view.
- Axmi_09 – site is indistinguishable from the AONB landscape and would be a car based satellite suburb. Considered to be the least defensible site for development. No respondents supported development of the site.

- Axmi_10 – site is being marketed for housing and may be suitable for 3 – 4 storey buildings. Some respondents supported housing development, but a significant minority wanted it kept for community use.
- Axmi_11a – Large site with best access to the town and opportunities to provide flood mitigation to ease pressure on the Purzebrook. Support for high density affordable housing. A significant number of respondents were opposed to development for reasons including impact on setting of school, increased traffic and flooding. There was also support for development, with a majority supporting the steering group comments.
- Websters Garage – The Steering Group thought that this site should be allocated for development to encourage its use. Most respondents agreed and were keen to see something happen soon, although several expressed concerns about lack of car parking.
- Millway Rise Football Field – Site is not allocated in the plan, but a separate EDDC document proposed a modest number of affordable homes at low density. The Steering Group feels that if affordable housing is to be built it should be at least 50 homes, but a new food store is preferred, possibly with affordable housing as well. The majority of respondents agreed, but some were concerned about loss of green space.

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

LP_Axmi_01a – Land off Musbury Road, Axminster (southern area) - Proposed Employment Allocation

- Representation on behalf of land owner includes a concept plan showing around 6,000 square metres of employment floorspace with more achievable if two or more stories allowed. Benefits of the scheme are listed as flood storage in the central part of the site with public access, biodiversity net gain and retention of heritage assets.
- The Environment Agency state that area at risk of flooding to the northern boundary should be set aside for green infrastructure with at least an 8-metre buffer from the watercourse free from development.
- Land of Musbury Road (site Axmi_01) has been split into a southern area (a) and a northern area (b).
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with

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

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

LP_Axmi_01b - Land off Musbury Road, Axminster (northern area) - Rejected Site

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

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

LP_Axmi_02 - Land North of Shoals, Musbury Road, Axminster - Preferred Allocation

- Axminster Town Council is concerned that the site lies beyond a long-established and clear natural boundary and development would act as a bridgehead for further housing. They are concerned that there is no safe access to the town along Musbury Road and access via Wyke Lane involves steep slopes and a long distance so that future residents are likely to walk. The site is attractive countryside, visible from the AONB, is good agricultural land and used for recreational walking. Environmental mitigation would reduce the number of homes that could be delivered.
- The Environment Agency state that areas at risk of flooding to the southern boundary should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- Representations on behalf of prospective house builder state that this site should be considered as one with Axmi_08 and Axmi_09. Technical reports on geotechnical, contamination, infrastructure, landscape, ecology and historic environment show sites are deliverable.
- Good job opportunities for locals.
- Probably the best site for homes in the area.
- Priority should be given to brownfield sites.
- Overdevelopment
- A number of respondents raised concern about the archaeological importance of the site including its close proximity to a Romano British village, Fosse Way and Saxon and Roman finds.
- A number of respondents lamented the loss of green space used for recreation and important for mental health.
- Some respondents were concerned about the loss of agricultural land.
- Lack of infrastructure and services.
- Additional traffic will cause pollution and congestion.
- Would cause traffic problems because Woodbury Lane is not wide enough for two-way traffic.
- Pedestrian access to the town is limited.
- Flooding from tributary to River Axe.
- Should develop sites closer to town centre.

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

LP_Axmi_07 - Axminster Carpets Factory Site, Woodmead Road, Axminster - Preferred Allocation

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

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

LP_Axmi_08 - Land off Wyke Lane, Axminster - Preferred Allocation

- Axminster Town Council is concerned that the site lies beyond a long-established and clear natural boundary and development would act as a bridgehead for further housing. They are concerned that there is no safe access to the town along Musbury Road and access via Wyke Lane involves steep slopes and a long distance so that future residents are likely to walk. The site is attractive countryside, visible from the AONB, is good agricultural land and used for recreational walking. Environmental mitigation would reduce the number of homes that could be delivered.
- The Environment Agency state that areas at risk of flooding to the southern boundary should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Representations on behalf of prospective house builder state that this site should be considered as one with Axmi_02 and Axmi_09. Technical reports on geotechnical, contamination, infrastructure, landscape, ecology and historic environment show sites are deliverable.
- Not close to transport link and would cause greater pollution, climate change and road congestion.
- Site remote and would need car to access essential services.
- Open countryside beyond long established and natural boundary.
- Visible from AONB.
- Loss of recreational walking area important for mental health.
- Huge impact on local amenities.
- Additional traffic on Woodbury Lane, which has dangerous access to Lyme Road.
- Greenfield site would harm wildlife and increase runoff to other land including A35 junction.
- Woodbury Lane and Wyke Road are narrow and constrained by parked cars.
- Greenfield site should be used for food production.
- Flood risk to properties on lower land.
- Lack of infrastructure.

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

LP_Axmi_09 - Great Jackleigh Farm, Axminster - Potential 'Second Best' Allocation

- Axminster Town Council feel that the considerations that apply to Axmi_02 and Axmi_08 apply to this site. In addition, the distance from the town would result in a car dependent satellite suburb where residents would shop in Seaton so that countryside would be traded for housing that could go elsewhere. The situation could be improved if these three sites had their own facilities such as school, shop and GP surgery.
- The Environment Agency state that areas at risk of flooding associated with the watercourse that bisects the site should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- Representations on behalf of prospective house builder state that this site should be considered as one with Axmi_02 and Axmi_08. Technical reports on geotechnical, contamination, infrastructure, landscape, ecology and historic environment show sites are deliverable. Site should be included as a preferred allocation,
- Would destroy rural charm of Devon lanes and ditches.
- Increase in traffic.
- Loss of walking areas.
- Open countryside beyond long established and natural boundary.
- Visible from AONB.
- A few respondents felt it would lead to the loss of recreational walking area important for mental health.
- Lack of services and facilities.
- Loss of greenery and wildlife.
- Infrastructure cannot cope.
- Loss of greenfield site.
- Loss of trees and hedgerows.
- A few respondents mentioned increased flooding.
- Landscape same quality as AONB.

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

LP_Axmi_10 - Scott Rowe Building, Axminster Hospital, Chard Street, Axminster - Preferred Allocation

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

LP_Axmi_11 – Whole site – All comments from site promotor

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

LP_Axmi_11a - Land on the south-east side of Axminster - *Potential 'Second Best' Allocation*

- Devon County Council, as landowner, supports allocation as site is close to town centre, has good access to local facilities and transport options.
- Axminster Town Council consider this to be the best large site for access to the town centre. It would offer opportunities to build in flood mitigation measures to relieve flooding on the Purzebrook and the Town Council support high density affordable housing on the site.
- The Environment Agency state that areas at risk of flooding associated with the watercourse on site should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development. Given the history of flooding to property downstream, development should seek to provide a reduction in risk.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- Site promoters state that site is suitable and deliverable for at least 250 homes with sizeable open space.
- Site has potential and is close to amenities of town, although wet at the lower edge.
- Flooding of Phillips Court, Lea Combe and Purzebrook.
- Several respondents mentioned that the fields are used by dog walkers.
- Air noise and light pollution. Increased traffic congestion.
- Give priority to wildlife.
- A couple of respondents mentioned inadequate access.
- A couple of respondents were concerned about the loss of natural context for school.
- Oak tree must be preserved.
- Preserve all boundary trees.
- Increased runoff.
- Should combine with Axmi_12 but go no further south than fire station.
- Partly on flood plain.
- Beautiful area.
- Will cause disturbance to the school.
- Steep gradient.
- Will add to river pollution.
- Road congestion and poor access.

LP_Axmi_11b - Land on the south-east side of Axminster - *Rejected Site*

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

LP_Axmi_12 - Land at Lea Combe, Field End, Axminster - *Preferred Allocation*

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

LP_GH/ED/79 - Land east of Axminster - *Preferred Allocation*

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

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

LP_GH/ED/80a - Prestaller Farm, Beavor Lane, Axminster - Preferred Allocation

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

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

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

LP_GH/ED/80b - Prestaller Farm, Beavor Lane, Axminster - Rejected Site

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

LP_GH/ED/81 - Land east of Axminster - Rejected Site

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

LP_GH/ED/82 - Land at Weycroft Manor Farm - Proposed Employment Allocation

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

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

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

LP_GH/ED/83 - Land at Chard Road, Axminster - Preferred Allocation

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

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

Omission sites at Axminster

- Axminster Town Council ask that sites Axmi_15, Axmi_16, Axmi_17, Axmi_18, Axmi_19, Axmi_20, Axmi_22 are considered together with the Webster's Garage site.
- Land West Of Prestaller Farm Beavor Lane - a planning application for 29 dwellings on this land is currently under consideration 21/3025/MFUL. The agent states that the Highway Authority have no objection to the application and that drainage and landscape improvements are under consideration to improve the scheme. It is asked that the settlement boundary be extended to include this land.

Policy 20 - Exmouth and its future development - General issues

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

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

- Many comments expressed concern that development to the north of Exmouth would erode the gap between Exmouth and Lympstone (and Woodbury) and impinge on the settlement and character of Lympstone;
- There were many concerns expressed in respect of the highway capacity at and around Exmouth and the ability to cope with additional vehicular traffic;
- The A367 was specifically highlighted, in many representations, as a road that is already congested and that cannot cope with additional pressure from development;
- There were concern that the levels of development around Exmouth will leave to vast amounts of tree felling and loss;
- It was considered that many proposed development allocations sites would be contrary to the Exmouth and also the Lympstone Neighbourhood Plans and too much development, in general, is planned leading to inconsistent with neighbourhood plan/s.
- Views were expressed that completion of Dinan Way should happen before further development occur.
- There were concerns that bus services were inadequate with specific calls for a 15 minute bus service on the number 57 to Exeter, plus reinstatement of the number 58 service to Sowton.
- In some site specific comments there were concerns raise about adequacy of bicycle links and there was a call for cycle facilities on Exeter Road, Dinan Way, Salterton Road, and Rolle Street to enable journeys around the town and to the Exe Estuary Trail;
- Many representations advised of limited employment in Exmouth, as a reasons to oppose residential development, with it being pointed out that most people travel to Exeter to work, new houses were seen as exacerbating this situation.
- Views were expressed, in respect of many sites, that they were on the periphery of the town and some distance from the town centre. For example in representation it was advised that Lymp_08, 09, 10a, 14 and Exm_04 are all more than 1.5 miles from the town centre with no public transport.
- There was concern expressed that development will inevitably be poor quality and that it will not support community needs.
- The suitability of Exmouth Community College to expand to accommodate additional pupils is challenged with recent school development proposals seen as being of poor quality.
- Parking, congestion and vehicle fume concerns are sited as problems at and with the school.
- There was a call for better train services and railway upgrades and a new Park and Ride station to the north of Exmouth.
- Many site-specific comments (objections) to development, raised concerns about the ability of the existing social and community infrastructure of Exmouth to meet existing needs. Significant concerns were raised around the ability to accommodate needs

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

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

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

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

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

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

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

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

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

- LP_Exmo_04a - Land at Marley Drive - *Potential 'Second Best' Allocation*
- LP_Lymp_09 - Land at Hulham Road - *Preferred Allocation*
- LP_Lymp_10a - Land off Hulham Road - *Preferred Allocation*
- LP_Lymp_14 - Coles Field, Hulham Road - *Preferred Allocation*

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

- Devon County Council (DCC) state an underground watercourse flows through Lymp_14 with sections possibly culverted – this should be investigated and opportunities to enhance or daylight any sections should be sought.
- DCC state the drainage at Lymp_09 and 10a may need to be carefully considered if infiltration is not viable – there do not appear to be any watercourses or sewers in the vicinity.
- Lympstone -
- Part of this site is in Lympstone Parish and designated 'red' on the maps as rejected for development. However, on the notes part of the site may be considered a second-best choice noting site constraints.

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

- A site promoter objected to an approach that seeks to link the delivery of these sites because they are in differing ownerships and some are affected by delivery constraints, whilst others are not. They considered Lymp_14 to be an unconstrained site that can be released early once services have been provided through the existing Goodmore's Farm development. There is no objection to masterplanning work being undertaken collaboratively, so long as that does not inhibit the opportunity to deliver Lymp_14 in expedient fashion.

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

- Development would lead to adverse impacts on trees with Tree Preservation Orders and ancient woodland – it was advised that there must be a 500 meter buffer between any development and ancient woodland.
- The woodland area included within the LP_Exmo_04a proposed allocation is under review and it is expected that it will be designated as ancient woodland later this year. This woodland must be retained as it is incredibly important from an ecological perspective supporting numerous fauna and flora. The woodland must be protected. If Exmo 04a is not withdrawn from the plan it will require a 50-metre buffer/exclusion zone around the woodland to aid its preservation.
- The land in the eastern section of proposed allocation Exmo_04a is to be proposed as additional county wildlife site as it immediately abuts the existing designated land in this area, which in turn abuts the ancient woodland.
- In the parcel EXM 12 there are TWO county wildlife sites and many extremely old evergreen oaks with TPO's
- Ecological constraints would mean that pedestrian and cycle paths will not be built;
- Horrified and scared at the proposal to build yet more houses in the vicinity of Exe View and Hulham Road.
- Development would result in the loss of wonderful countryside, a respondent advises which I walk and relax in is to be vandalised
- Concern over at least 200 more motor vehicles in Wotton Lane, known locally as the "rat run".
- Lack of infrastructure – especially health service provision;
- Development would lead to overwhelming by the extension of Exmouth;
- Lack of clarity over who the houses are for;
- Absence of businesses (nearby) to supply jobs for residents;

- Development would adversely impact on appeal of the area to tourists.
- Development of the site would not be sustainable;
- There is inadequate school provision;
- Roads are at capacity;
- Highway safety and noise nuisance issues would arise;
- Insufficient infrastructure capacity with expectation from development of particular pressure on the road links to Exeter.
- Brownfield and town centre sites should be redeveloped to accommodate the extra housing;
- Unacceptable impacts on wildlife within and at the site;
- Flooding will be exacerbated by additional tarmac;
- In respect of site Lym_10a one respondent advises it is - On the wrong side of the road. Floods a lot and blocks the stream down Wotton lane leading to flooding at the Sadllers Arms.
- The sites are three miles from the town centre, which on top of the Goodmores estate will create more traffic on the local roads around that area which are already very busy;
- Site/s are at the outer (or beyond) peripheries of acceptable walking distances;
- Homes built will not be affordable. Highlighted that only 16 out of 317 homes on the Goodmore estate will be affordable.
- Concern that there are not enough services in Exmouth to support another 1,000 local residents
- Concern that Exmouth only has two large supermarkets in the town, the rest are small convenience stores with higher prices.
- The view was expressed that this development, in conjunction with others, will have a huge negative impact on the health and wellbeing of Lypstone Parish residents.
- Concern expressed that bus and rail services at or close to the site are very poor.
- Access to employment opportunities was cited as being poor.
- View is expressed that there are no safe pedestrian and cycle routes so residents will be car dependent;
- The view was expressed that car use will be the norm for persons to travel to work on already overcrowded roads;
- The development will have significant negative effects on the environment.
- Farming land will be lost – one respondent advised it is Grade 1.
- The green wedge between Lypstone and Exmouth will be seriously eroded;
- The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents.
- Valuable wildlife corridors will be lost;
- Important areas of landscape and visual amenity will be lost forever;

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

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

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

- A proposal submitted is to build an over 70's complex with 60 homes on a much-reduced Lymp 14 site. With traffic management measures as part of the scheme, including cycling and pedestrian improvements and also to provide a county park on land not being developed. This is considered to be a means to provide some housing without the scale of adverse impacts and also a means to secure community benefits.
- The promoter of site Exmo_04a considers that this site should be a preferred allocation. It is free from constraints, sustainably located and readily deliverable. Technical details are submitted with the representation.

LP_Exmo_01 - Estuary side - *Rejected Site*

- No comments

LP_Exmo_02 - Queen's Drive, Exmouth - *Rejected Site*

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

LP_Exmo_03 - Land at bottom of Bapton Lane - *Rejected Site*

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

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

It was also highlighted that:

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

LP_Exmo_04b- Land at Marley Drive - Rejected Site

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

- Application of the 400 metre exclusion zone rule was opposed on the basis of adjacent properties already being in the exclusion zone and the site being separated from the Peblbed Heaths by a busy road.
- It was noted that around 1 hectare of the site is outside of the exclusion zone and it is suggested it is suitable for development (alongside Exmo_04a).
- The site considered unsuitable for development in representation on account of:
 - distance from services,
 - inadequate infrastructure;
 - Being a wet area of land holding surface water
 - Wildlife value
 - Impacts on roads
 - Leading to more commuting to Exeter – by future residents.

LP_Exmo_06 - Douglas Gardens - Preferred Allocation

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

Matters of objection to site development included:

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

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

LP_Exmo_07 - Bystock Court - Rejected Site

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

LP_Exmo_08 & 16 - Littleham Fields and land to the rear of Elm Lane - Preferred Allocation

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

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

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

LP_Exmo_10 – east of Liverton Business Park - *Rejected Site*

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

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

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

LP_Exmo_17 - Land to the south of Littleham - *Potential 'Second Best' Allocation*

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

Comments from key agencies and the site promoter included:

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

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

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

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

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

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

Additional qualified views expressed included:

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

LP_Exmo_20a - Land at St John's - Rejected Site

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

There was objection raised that:

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

LP_Exmo_20b - Land at St John's - Potential 'Second Best' Allocation

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

There was objection raised that:

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

In qualified support of the site:

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

LP_Exmo_21 - Land north-east of Old Bystock Drive - Rejected Site

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

LP_Exmo_23 - Land to the south of Courtlands Lane - Potential ‘Second Best’ Allocation

There was objection raised that:

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

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

In qualified support of the site:

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

LP_Exmo_47 - Land west of Hulham Road (south-east of point in view) - Rejected Site

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

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

LP_Lymp_07 - Land at Courtland Cross - Potential 'Second Best' Allocation

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

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

There were objections raised that:

- Lymp_07 should not be assessed under Exmouth as it is clearly within Lympstone and should be assessed as such. If assessed this way it would not be required, even as a 2nd choice site and therefore not allocated.
- Development is a very serious threat to the identity of Lympstone with potential to “destroy the character and community of the village”.
- The site has been the subject of 3 refuse planning applications including one at appeal (also a single house was refused at appeal)
- This development will have a huge negative impact on the health and wellbeing of Lympstone Parish residents.
- The site does not have easy access to bus and rail services (existing train services are running at capacity);
- The site is remote from employment opportunities
- Car use will be the norm for persons to travel to work on already overcrowded roads.
- There is a lack of infrastructure capacity to cope with development;
- The development will have significant negative effects on the environment.
- Farming land will be lost;
- The Coastal Preservation Area will be built upon and permanently lost – this directly contradicts Council policy.
- The green wedge between Lympstone and Exmouth will be seriously eroded;

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

- The National Trust highlight importance assets that they own at Exmouth, both countryside and built heritage. They stress the heritage importance of A la Ronde and landscape relevance of Lower Halsdon Farm. The National Trust reiterate past objections that relate to the potential for development of Site Lymp_07, specifically noting landscape sensitivity concerns.

In qualified support of the site:

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

LP_Lymp_08 - Land off Summer Lane - *Potential 'Second Best' Allocation*

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

There were objections raised that:

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

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

LP_Lymp_10b - Land off Hulham Road - Rejected Site

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

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

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

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

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

LP_Lymp_12 - Land north of Summer Lane - Rejected Site

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

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

LP_Lymp_13 - Kings Garden & Leisure, Higher Hulham Road - Rejected Site

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

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

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

Omission sites at Exmouth

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

Policy 21 - Honiton and its future development - General issues

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

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

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

LP_GH/ED/39a - Land south of Northcote Hill - Preferred Allocation

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

- The proposed development of new housing would devalue the existing park homes in the area. Existing residents are concerned that they will not be able to sell their homes if the development goes ahead.
- The development would require the construction of a new 2-lane road, cycle track, and pedestrian path, which would disrupt the residents of Otter Valley park.

- Multi-generational housing estate is not suitable for the needs of the area. The land should be used to expand the retirement village instead, as this would be more in line with the needs of the current residents and would have a smaller impact on the environment.
- The local facility such as GP surgery are already over capacity and there is no provision to resolve this.
- Development at the northeast edge of Honiton, which is closer to town centre and facilities compare with those sites in southwest Honiton.
- The development would be located close to a railway line, which would pose a noise and safety hazard to residents.
- The proposed site would be a better option for housing than the designated AONB sites. It is a lovely place to live, within walking distance to the town, and the best place to put houses in Honiton.

LP_GH/ED/39b - Land south of Northcote Hill - Rejected Site

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

LP_Gitti_03 - Land south of the A30, west of Honiton - Proposed Employment Allocation

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

LP_Gitti_04 - Land and south of the A30, west of Honiton - Proposed Employment Allocation

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

LP_Gitti_05 - Land west of Hayne Lane, Honiton - Potential 'Second Best' Allocation

- DCC note there are several ordinary watercourses within this site which have required significant works downstream to manage associated erosion.
- Woodland Trust advise that trees on the Ancient Woodland/Ancient Trees inventory (ref Veteran Pedunculate Oak (ATI no: 114363)) are within the site. Please ensure that necessary protections are in place for these trees and ancient woodland sites, including suitable Root Protection Zones and buffer zones of at least 50metres between any development and the ancient woodland. Please ensure that no development will take place which will adversely impact irreplaceable habitats according to the NPPF.
- Honiton Town Council stated the allocated site is too big and encroaches into the AONB. They would support a smaller site, restricted to the east and out of the AONB.
- Gittisham Parish Council objects to the proposed allocation LP_Gitti_05, which would see 31 new homes built on land near Gittisham village. The council has a number of concerns about the development, including its impact on the setting of the village and

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

- Developer (Combe Estate) support the site allocation and introduce 3 development proposals for the site
- The developments would add an additional 200 homes to the area, which would put a further strain on the roads and other amenities.
- The development would have a detrimental visual impact to the AONB and on the setting of the AONB.
- The development would destroy wildlife habitats and damage the natural beauty of the area.
- The development would have a detrimental impact on the setting of Gittisham Village and its conservation area.
- The development would be located in an industrial area, which is not appropriate for residential development.
- Distance from town centre, schools, health centre/hospital, train station and commercial centre will result in car travel resulting in an unsustainable development.
- It is not appropriate to increase further residentially generated traffic and pedestrian movements through an industrial estate.
- Highways, sewers, and sewage treatment infrastructure already at capacity
- The proposed development would further increase flooding in the area. The author believes that the development would make the problem worse because the river catchment in the area is already very reactive to flooding.
- The actual area proposed for development must be clarified before any proposals are made.
- The current emergency access to the Hayne Farm estate is very poor, and it would only get worse if the proposed development went ahead.
- Meadow Acre Road, which is currently the main access route to the area, is already too narrow and crowded with vehicles. And the access routes from Hayne Lane and the Industrial Estate are not ideal.
- Those recently built housing has had a detrimental environmental impact and impact upon the beneficial qualities such as “Dark Skies”.
- No “exceptional circumstances” that would justify allowing this development. More suitable sites available for development in Honiton such as brownfield sites.
- The allocation of any part of Gitti_05 site would be contrary to Objectives 7-9 and 11 of the local plan.
- New developments are far from High Street, so active travel links are needed to prevent people driving to Tesco and harming High Street businesses.
- Social housing is needed in Gittisham.

LP_Gitti_06 - Hayne Farm, Hayne Lane, Honiton - Preferred Allocation

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

LP_Honi_01- Land at Heathfield, east of Hayne Lane, Honiton - Potential 'Second Best' Allocation

- Honiton Town Council objects to the proposed development of this site because it is within the AONB and would adversely affect the landscape and ecology. Two previous planning applications for the site have been refused, and the reasons for refusal are still valid.
- Most of the representations concerned the site is in an Area of Outstanding Natural Beauty and would have a negative impact on wildlife
- A high number of representations object Honi_01 allocation, including a petition signed by residents in the existing neighbourhoods. Most of the residents concerned the existing roads are not suitable for increased traffic, and Honeysuckle Drive would become a main access road causing increased traffic, loss of privacy to residents and increased noise levels. Also, it is not feasible for this small road to handle an additional 300+ cars; Old Elm Road is a small road that is already in poor condition. If it is used as an access route for the proposed development, it would create chaos for thousands of residents and the road would become unusable; Hayne Lane is a narrow, unpaved road that is in need of repair. It is already heavily used, and the proposed development would only make it worse.
- Gittisham Parish Council is also concerned about the access to LP_HONI_01. This proposed allocation is outside the parish but would be accessed through Gittisham Vale.

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

- Gleeson Land supports the allocation of the Honi_01 site as a housing allocation meeting local housing need in Honiton. They believe that a landscape-led development can be brought forward on the site, which would be well integrated into the landscape and would create a softer, more sympathetic edge to Honiton in this location, enhancing the Area of Outstanding Natural Beauty (AONB). They suggest that the Honi_01 site is deliverable within the first five years of the plan period.
- Gleeson Land believes that there are wider opportunities to bring forward additional housing growth in the Honiton area. They have provided a landscape capacity plan for the fields to the west of the Honi_01 Site, which they also control, and suggested that a comprehensive development on these sites would not harm the landscape and would enhance the AONB.
- No direct access to any roads, so new access roads would need to be built across fields in the AONB.
- The existing sewerage and drainage systems are already overloaded, it would increase flooding and sewage discharge issues in the area.
- The subject site was refused, the decision should remain as the reasons for refusal still apply today.
- There are general concern from the representations regarding the local facility such as GP surgery and local schools are already over capacity and there is no provision to resolve this. Honiton has already lost public toilets due to a shortage of funding
- The development would not be in keeping with the surrounding area, which is mostly bungalows.
- Water pressure is an issue in Heather Close and this site is higher and closer to the water reservoir, which will cause pressure issues unless additional pumping facilities are provided.
- Honi_01 is located next to a flood-prone brook. The development would increase the risk of flooding to existing properties by increasing surface water runoff and blocking the brook's natural drainage path.
- Honiton town centre does not have enough car parking space
- The proposed site is home to a variety of protected species of wildlife, including barbastelle bat and 7 RSPB priority species. The development of the site would have a significant impact on the ecology of the area, including the loss of foraging and breeding habitat for bats, the loss of nesting and feeding habitat for birds, and the disturbance of newts during their breeding season.

LP_Honi_02 - Land at Blackdown House, Honiton - *Rejected Site*

- No comments

LP_Honi_04 - Land lying to the north-east of Heathfield Manor Farm, Honiton - *Rejected Site*

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

LP_Honi_05 - Land to the north and south of King Street (including former Foundry Yard), Honiton - *Potential 'Second Best' Allocation*

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

LP_Honi_06 - Former Millwater School, Bottom Road, Littleton, Honiton - *Preferred Allocation*

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

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

LP_Honi_07 - Land adjacent to St Michael's Church, Honiton - *Potential 'Second Best' Allocation*

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

LP_Honi_08 - Land at the south side of The Glen, Honiton - *Rejected Site*

- No comments

LP_Honi_09 - Former Honiton Showground, Langford Road, Honiton - *Rejected Site*

- Agent on behalf the site owner argues that the SA has dismissed Honi_09 too simplistically. They believes that Honi_09 is a suitable site for development, and that it would not have a significant negative impact on the AONB landscape due to its low-lying location and surrounding infrastructure.

LP_Honi_10 - Land at Ottery Moor Lane - Preferred Allocation

- National Highways recommend the policy text includes consideration of noise and visual intrusion impacts from the A30, to ensure the well-being of future residents.
- Honiton Town Council believes that the development of Honi_10 would result in the loss of a green space that acts as a buffer between the new estate and the A30. The council also believes that the location is unsuitable for housing due to the proximity to the A30.

LP_Honi_12 - Land on the south-east side of Cuckoo Down - Lane and land at Lower Marl pits Farm, Honiton - Rejected Site

- Agree Honi_12 as rejected site, as this open green space is a valuable recreational resource and a scenic spot that should be preserved.

LP_Honi_13 - Middle Hill, Church Hill, Honiton - Potential 'Second Best' Allocation

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

LP_Honi_14 - Hurlakes, Northcote Hill, Honiton - *Potential 'Second Best' Allocation*

- The narrow rail bridge on Northcote Hill needs to be managed to allow for a pedestrian and cycle way to join with Monkton Road - and as the slip road from the A30 joins there, a segregated bi-directional cycle way on the south side would be beneficial also to GH/ED/39a
- Honiton Town Council suggested Honi_14 should be a preferred option.

Omission sites at Honiton

- None recorded.

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

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

Other comments include:

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

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

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

LP_GH/ED/26- Land west of Cadhay Lane - Rejected Site

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

- This site does have some issues regarding visual impact but this could be overcome by good design and tree planting.
- The site promoter objects to the failure to allocate this site for housing and considers this to be unsound given the prevailing evidence regarding this site and the fact that adjoining land with similar characteristics is allocated for development. All of the negative effects of allocation could be mitigated.
- The site promoter considers that a portion of the site could be allocated and now proposes that the eastern section only be allocated for housing.
- Separation between West Hill and Ottery would still be maintained and the two sites wouldn't have views of each other because of the established woodland.
- No flooding problems.
- Disagree with any further development in Ottery St Mary
- This land is in the middle of the Settlement Containment zone defined in the adopted Neighbourhood Plan, and development would lead to the coalescence of Ottery and West Hill.
- Object to development of good quality agricultural land
- GH/ED/26 and LP_Otry_01 should be split and considered on a field by field basis rather than discounted due to their size. This would overcome concerns about the size of site, projection into the countryside and settlement coalescence
- This site performs better than LP_Otry_01 in terms of topography, visibility, landscape impact, and access to services. The eastern part of GH/ED/26 should therefore be allocated for housing and could deliver up to 200 homes.

LP_GH/ED/27- Land south of Strawberry Lane - Preferred Allocation

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

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

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

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

LP_GH/ED/29a- Gerway Farm (East) - Potential 'Second Best' Allocation

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

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

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

LP_GH/ED/29b- Gerway Farm (West) - Rejected Site

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

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

LP_GH/ED/30- Sidmouth Road, Junction with Gerway Lane - Rejected Site

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

LP_GH/ED/31 - Slade Farm - Rejected Site

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

LP_GH/ED/32 - Church Path Field, East of Chineway Gardens - Rejected Site

- No comments

LP_GH/ED/33- Land adjacent Greatwell Farm - Rejected Site

- No comments

LP_GH/ED/34- Land at Littlewell - Rejected Site

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

LP_GH/ED/35 - Land at Ridgeway - Rejected Site

- Poor access

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

LP_Otry_01a - Barrack Farm - *Rejected Site*

- Devon County Council support rejection of this site as within Mineral Safeguarding Area.
- The site has good road links into and out of Ottery St. Mary, and should be considered as part of the solution to East Devon housing needs providing a decent corridor of development together with Ottery 09 and Otry 01b.
- Visual impact could be addressed through tree planting
- It is ordinary farmland with little or no ecology.
- The likelihood of coalescence between West Hill and Ottery is low considering the topography of the land and the established woodland.
- It is close to the secondary school and 1555m from the Medical centre.
- It has good road links and Ottery Town council has for years wanted a roundabout to temper the traffic speed this was proposed together with a school in a previous planning application on Ottery 09 which was supported by officers and wrongly refused.
- If we have to develop in East Devon the majority of our towns are in the valleys surrounded by rising ground often which is designated ANOB which often means any development extension of a established town is going to be seen , "it is inevitable " Design and landscaping must be used to mitigate such issues but to use this reasoning to force development away and onto less suitable areas must be questioned.
- This is in the Settlement Containment Zone identified for protection in the adopted Neighbourhood Plan. Development would constitute ribbon development and would lead to coalescence of Ottery and West Hill.
- The site is remote from the town centre facilities, which are already under significant pressure.
- GH/ED/26 and LP_Otry_01 should be split and considered on a field by field basis rather than discounted due to their size

LP_Otry_01b - Barrack Farm (east) - Preferred Allocation

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

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

- Site is remote from the town centre and facilities, which are unable to cope with additional development
- Local amenities and infrastructure for the town cannot cope with pressure from more houses in the town.
- Inadequate road access compounded by extensive parking on the lane which dangerously obstructs exit from the housing estate already present. Overflow parking from the nursing homes adds to the problem.
- There are no school spaces for the residents of new homes.
- This will urbanise the countryside setting of the town
- No need/demand for industrial. Detailed assessment is needed
- Recent agriculturally tied dwelling was approved based on farming this land- will this be revoked?
- Light pollution will damage the environment
- GH/ED/26 and LP_Otry_01 should be split and considered on a field by field basis rather than discounted due to their size
- The delivery of 1.25 hectares of employment land on this site (as with every other proposed mixed use development site) is unlikely to be delivered.
- Residential development is not appropriate given the existing use of this site.

LP_Otry_09 - Land at Thorne Farm - Preferred Allocation

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

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

- Policy Otry_09 does NOT safeguard the land reserved for expansion of The Kings School. The Policy proposes 90 dwellings, nothing else, which is contrary to Neighbourhood Plan Policy NP24. The Ottery St Mary Draft LP map does not show any land reserved for education purposes.
- The planning application made by Devon CC in 2020 for 150 dwellings and a primary school was refused. Funding a new primary school by Devon CC selling their land with planning permission for housing is of no relevance to allocating land for housing in a Local Plan.
- Because of its location up a steep hill and proximity to speeding traffic, the site is not suitable for a new primary school. Also, recently Devon CC have secured government funding to replace the Tipton St John primary school in Tipton St John.
- No consideration has been given to the resulting generation of additional traffic using Barrack Road and Cadhay Lane; the latter, which has no footways, is not suitable for additional vehicular traffic and is already a danger for pedestrians and cyclists.
- There should be no access to the proposed site to/from Cadhay Lane.
- The Plan is proposing at least 240 new homes to the west of Ottery without any consideration for providing adequate services and infrastructure. This is grossly negligent/the plan is unsound.
- The topography of the land to the north is unsuitable for development due to it being a steep sloping area. Concerned the runoff of rain will flood houses lower down.
- The land in question supports a variety of wildlife including protected species e.g. badgers, dormice
- Development of improved educational provision should not be dependent upon selling land off for housing development in order to fund capital investments in an enlarged school.
- A small amount of housing might be acceptable as long as a new school is delivered
- Local amenities and infrastructure are over capacity
- Quarry – with the quarry now agreed, there are severe concerns about how the quarry operations will cause water pollution. This proposed site is directly below the quarry site, so there could be a major safety concern.
- Next to a site of special scientific interest, namely the Cadhay bog. Even if houses were not built directly next to it, there will be human disturbance, litter etc which could affect this sensitive site, which has taken hundreds of years to form.
- This site is visually prominent
- One respondent submitted a very detailed response querying the need to retain the site for a new primary school and raising a number of technical concerns (particularly re flooding, highways and feasibility) which are beyond the scope of the local plan
- Increased noise and light pollution- detrimental to human rights Act and right to quiet enjoyment
- Will dominate properties in Cadhay Close

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

LP_Otry_10 - Land north and south of Salston Barton - Preferred Allocation (northern section only)

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

- Development will have a large ecological impact on the natural environment. Plans contain errors, omissions, and inconsistencies.
- Existing empty homes within Devon should be reused
- Flood Risk- existing issue, extra run-off will make this worse. Requires a physical survey not just a desk top assessment
- Roads are single vehicle width and flood impassably.
- This is rural land that provides a beautiful natural habitat and green space amongst what is rapidly becoming a built up urban area.
- Will significantly impact views from across the valley.
- The objectivity of the Sustainability Appraisal is therefore compromised if its author has promoted an unpublished objective (to join OSM with the hamlet of Salston) rather than appraised the constraints.
- Construction noise for many more years above the 7 years construction for Kings Reach
- Mental health impacts including noise and fear of flooding
- Water quality impacts on the R. Otter
- Possible land stability for properties at Salston Barton
- Significant visual impact from East Hill AONB, whilst most of Salston is hidden in lower ground
- GH/ED/26 and LP_Otry_01 should be split and considered on a field by field basis rather than discounted due to their size
- Concern expressed re probity and inconsistency as other sites with the same or lesser constraints have been discounted
- Concern that bringing forward small parcels/sites avoids the need for EIA but the effects should be considered cumulatively
- Lovely safe green space with a sociable footpath for meeting neighbours and for dog walking, it has lovely wildflowers, old native mixed hedges and ancient and veteran oak trees. If its soil health (porosity and no compaction) is good, it is an essential water capture site to prevent run off into existing homes.
- Sewerage at Salston Barton – Houses 11 to 14 have soakaway system that requires the paddock adjacent to the drive (part of LP Otry 10).
- Houses 1 to 10 have a bacteria digester system. This is at maximum capacity and can be overwhelmed if there is too much runoff getting onto the system.

LP_Otry_15 - Land at Bylands, Slade Road - Preferred allocation

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

Omission sites at Ottery St Mary

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

Policy 23 - Seaton and its future development - General issues

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

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

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

LP_Seat_01 - Clay Common, Seaton - Rejected Site

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

LP_Seat_02 - Land at Barnards Hill Lane, Seaton - Preferred Allocation

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

LP_Seat_03 - Land to the south of Harepath Hill, Colyford - *Potential 'Second Best' Allocation*

- Seaton Town Council want to see Seat_03 and Seat_05 developed together – Seat_03 should be a preferred allocation which provides badly needed sports pitches.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Developer (Baker Estates) support this allocation for around 70 dwellings and recreational use.

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

LP_Seat_04 - Land off Harepath Road at end of Fosseyway Park, Seaton - *Planning Permission Granted*

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

LP_Seat_05 - Land off Harepath Road, Seaton - *Preferred Allocation*

- Seaton Town Council consider this site and Seat_03 together and do not object to allocating both sites, providing they are developed together and provide more than just housing.
- Seaton Town Council state a footpath should be required from Colyford Road to Gravel Lane where a crossing should be installed.
- Historic England state it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it is likely to be able to accord with national policy, guidance and legislation.
- Developer (Baker Estates) support this allocation but should be amended to about 130 dwellings reflecting the submitted planning application.
- Planning Inspector dismissed this site in 2015 on grounds of high landscape value and ecological impact on bat pinch points.
- There must be footpath access from the development to the Wetlands, then south on the proposed cycle route into Seaton before construction starts.
- Object as within Green Wedge, contrary to current Local Plan.
- Object due to adverse impact on the village character of Colyford, upheld by a Planning Inspector on appeal.
- Mercia mudstone impedes drainage and infiltration from SUDS.

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

LP_Seat_06 - Former depot, Colyford Road, Seaton - *Planning Permission Granted*

- Seaton Town Council state that as no work has begun on the business units approved in July 2014, perhaps housing should be located here given its accessible location, and the business units moved to Seat_03.
- Concern that sewers and surface water drains could not cope with this development.

LP_Seat_07 - Land at Colyford Road, Seaton - *Rejected Site*

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

LP_Seat_08 - Land between Churston Rise and Couchill Copse, Seaton - *Rejected Site*

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

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

LP_Seat_09 - Land at Clay Common (Little Paddock), Seaton - Preferred Allocation

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

LP_Seat_10 - Land south of Beer Road, Seaton - Rejected Site

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

LP_Seat_11 - Land at Barnards Hill Lane, Seaton - *Rejected Site*

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

LP_Seat_14 - Seaton Town Hall Long Stay Car Park - *Rejected Site*

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

Omission sites at Seaton

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

Policy 24 - Sidmouth and its future development - General issues

- Recognition that the NPPF is (was) prescriptive on how local housing needs are to be established and that local plans must allocate sufficient land to meet those needs. However, it is important to note that the Standard Method for assessing local housing need is based on ONS projections of households and includes trend migration. So “local need” is in fact not local need as most residents would accept the term (ie the excess of newly forming households in the neighbourhood plus local suppressed demand); in fact East Devon's natural population growth is negative. The projections were based on a period when East Devon was subject to large in-migration from Exeter to Cranbrook, and there is a danger that this trend becomes self-perpetuating by being built into successive plan targets.
- The Environment Agency note that a coastal change management area including a significant number of residential properties is proposed to be designated and recommend the policy (in conjunction with Policy 37) considers allocating land precisely for the purpose of relocating the properties east of Sidmouth within the CCMA.
- Devon County Council (DCC) state the secondary school would require expansion to support the proposals.
- DCC support small levels of development – rejected sites are outside standard cycling distances to town centre so would require a good bus service, which would still be preferable to a new community.
- DCC state there are a number of surface water flowpaths, ordinary watercourses and flood zone areas impacting upon sites to the north of Sidmouth/Sidford - opportunities to enhance existing watercourses and daylight any culverted sections should be sought.
- Sidmouth TC - The additional burden on local services and the erosion of the AONB on which our tourism industry depends are the principal reasons why Sidmouth Town Council do not support the allocation of housing on Sidm_01, Sidm_06, Sidm_17 and Sidm_34. Sidm_06 and Sidm_34 also contravene the Sid Valley Neighbourhood Plan by promoting the coalescence of Sidford and Sidbury and the latter site also has highway difficulties.
- General comments resisting the development of green field and suggesting more emphasis is placed on brown field sites to help protect the planet and meet climate commitments.
- Comments suggesting that Sidmouth should have more residential allocations due to the presence of vibrant town centre / to balance with allocations at Exmouth and tier 2 settlements.
- SCOC - A far greater emphasis needs to be placed upon the provision of basic infrastructure: roads, health provision, schools, sporting and recreational facilities, utilities, public transport and community services. These are the essential requirements of modern life, not luxuries, yet they are barely mentioned. It is unacceptable to even

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

- Sid Vale Association -

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

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

- Sid Valley Biodiversity Group -

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

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

- Greenway Lane residents -

- We strongly believe that the small area of woodland to the extreme north of site Sidm_01, which borders Woolbrook Road and Greenway Lane, should be excluded from this allocation for development on the grounds of its positive contribution to the landscape character of the surrounding area, including the East Devon A.O.N.B, and because of its ecological value as a habitat for local wildlife.

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

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

- As we are stuck with the partially developed site at Sidford, why can't the council compulsorily purchase it at a fair price and change its use to affordable housing and houses suitable for elderly people? Which is what you say we need.
- Suggestions that low levels of proposed development in Sidmouth is politically motivated and/or due to the number of councillors and authority officers that live in Sidmouth.
- Suggestion that Sidmouth should have more services and jobs to support the scale of the town.
- Sidmouth should be recognised as having extremely limited development potential because of its location in the AONB.
- Housing mix should address the local population imbalance, with Sidmouth suggested as currently attracting high numbers of wealthy retirees with a population in balance and a high proportion of second homes.
- Request to revisit allocations and policy approach in light of government housing targets no longer being mandatory, but rather left to local decision makers.
- There is little reference or cross-linkage to other policies, including the climate emergency and biodiversity.
- The policy addresses possible need for additional development for 168 new homes and 3.11 Ha (7.68 acres) of employment. The evidence base for housing is provided but with no correspondingly detailed analysis of future employment trends and location of work.
- The VGS urge the District Council to clarify exactly as to how the new housing allocations will contribute to providing housing for the low paid who actually work in the Sid Valley. The VGS suggests that the plan fails to identify the high proportion of in commuting to serve the economic activity of the town.
- Need to protect the coastline from development.
- Turley for Bloor Homes – Supportive of Sidmouth as a tier 2 settlement. Suggest that a lack of suitable development opportunities calls for more land for development to be released (within the AONB). Challenge the logic for excluding sites LP_Sidm_02 and LP_Sidm_35 from the proposed allocations within the LP. Turley provide a Vision Document and call for a rethink on these sites.
- Policies on coastal erosion imply that little control would be placed on new developments. The policy needs to be developed so this is not seen as a route to easy planning consent in rural settlements within Sidmouth - much of which is in the AONB.
- Concern raised over pressure on housing market from second homes and holiday lets.
- Need evidence to show there is a demand for 2.4 hectares of employment land in Sidmouth and Sidbury, otherwise it could be used for residential by default – the Sid Vale Association do not consider there is demand for more employment land.
- Support Sidmouth settlement boundary proposed
- The East Devon AONB team state that 2 of the three sites for development are within the AONB but fall within the proposed new settlement boundary. Any of these

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

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

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

LP_Sidm_01 - Land south-west of Woolbrook Road, Sidmouth - Preferred Allocation

- DCC note there have been longstanding issues with ordinary watercourse and surface water flooding in the Woolbrook catchment, primarily of the highway – the site is an opportunity to lower flood risk to the catchment.
- The distance to any facilities and infrastructure of the proposed Sidm_01 allocation throws into doubt the viability of the 15/20-Minute Neighbourhood.
- Sidmouth Town Council does not support the allocation of employment land within the AONB at Sidm_01.
- Sidmouth Town Council would like to see land at Sidm_01 allocated in the Local Plan for a Park and Change facility.
- Sidmouth Cycling Campaign state the potential site for allocation south west of Woolbrook Road (Sidm_01) lies adjacent to the former railway line that has been identified as a future cycle route from Sidmouth to Feniton (included in Policy 66). We recommend that the boundary of this site be extended to include the former railway line. This will enable a condition to be put on any future planning permission for the former railway line to be adopted as Public Open Space and create a footway/cycleway to the south to link up with the existing public footpath to Ice House Lane. This would support Strategic Policy 65 and Policy 66.
- Woolbrook Road site (Sidm_01) housing numbers suggested as too high.
- Sid Vale Association -
 - There is no justification for 0.51 Hectares of Employment Land – as access is poor, there is no demand for more Employment Land and its incompatible to have Employment Land (i.e. B2 industrial uses) next to a new residential area).

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

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

- In our view, the Site would not provide a logical location for employment as there are sustainable and logical existing alternatives within the settlement. Furthermore, paragraph 6.53 of the Local Plan acknowledges the proposed strategy, in the context of the made Sid Valley Neighbourhood Plan, the clear emphasis on retaining existing employment sites and supporting the town centre. Arguably, this is contrary to Sidm_01, as worded. A blanket employment policy should not be utilised, and further consideration should be made on a localised basis, to meet settlement needs.

LP_Sidm_02 - Land at Sidford High Street - *Rejected Site*

- Development with AONB should not be considered.

LP_Sidm_03 - The Knowle, Sidmouth - *Planning Permission Granted*

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

LP_Sidm_04 - Land to the east of The Lookout, Coreway, Sidford - *Rejected Site*

- Development with AONB should not be considered.

LP_Sidm_05 - Land east of Burscombe Lane, Sidmouth - *Rejected Site*

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

LP_Sidm_06a - Land west of Two Bridges Road, Sidford - Preferred Allocation

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to the setting of Sidbury Castle and LB's
- SVA -
 - We strongly object to the development of this site as it constitutes infilling of the 'Green Wedge' between and separating Sidford and Sidbury. We do not support this policy as it is outside the 'settlement boundary' of Sidmouth/ Sidford and the Council's own policy discourages such development (ie Draft Local Plan Policy No 7 dictates that there should be no development outside the 'Settlement Boundary').
 - The Local Plan itself notes that this site could cause 'settlement coalescence' & encroach into the Green Wedge between Sidford and Sidbury again contrary to the Council's own policies (refer Draft Local Plan Policy 78 – see below and Policy 3 of the adopted 'Neighbourhood Plan for the Sid Valley 2018 - 2032 seeking to avoid 'Settlement Coalescence').
 - Additionally, this proposal is contrary to this Draft Local Plan's Policy 75 as the site is within the AONB and it will not enhance the AONB. Rather this proposal will be detrimental to the AONB.
- Agent for Land Value Alliance - We support the identification of the Land West of Two Bridges Road (SIDM_06A) as a preferred site for approximately 30 homes.
- The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is protected within the Sid Valley Neighbourhood Plan. The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas. This site cannot be considered in isolation to the existing permitted development at site Sidm_09 and the cumulative negative impact that this additional site would have upon the local community, the road network and the local vista.
- This site clearly contravenes the policy in the Neighbourhood Plan for a green wedge between Sidford and Sidbury. It is in the AONB and any development of the site is inappropriate.
- Further development in this area following that recently granted permission at national level must take into account the impact on a road that is only a status because it connects the towns of Sidmouth and Honiton. It does not have the capacity nor structure

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

LP_Sidm_06b - Land west of Two Bridges Road, Sidford - *Rejected Site*

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to the setting of Sidbury Castle and LB's
- Agent for Land Value Alliance – We consider that there is potential for a higher number of homes to be accommodated at Sidford [taking LP_Sidm_06a into account] and therefore that the Draft Plan should explore the potential for SIDM_06A to accommodate a quantum of development higher than 30 dwellings 'and that SIDM_06B could logically accommodate some of this increase.
- The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is protected within the Sid Valley Neighbourhood Plan. The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas.
- This location would not be appropriate for permitted development that a site of this size could deliver. This site cannot be considered in isolation to the existing permitted development at site Sidm_09 and the cumulative negative impact that this additional site would have upon the local community, the road network and the local vista.

LP_Sidm_08 (a/k/a Sidm_27) - Land east of Two Bridges Road, Sidford - *Planning Permission Granted*

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

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

- On behalf of OG Holdings Retirement Benefit Scheme -
 - In assessing the Sidford Site as part of the HELAA assessment, the LPA's Policy Team are asked to take account of the extant permission and the technical data available to them, including the Environmental Impact Assessment, which is already available to the LPA as part of the extant consent. This information confirms that the development area of the site can be delivered to achieve Flood Zone 1 and would in this respect be 'achievable' for housing.
 - If it is that the LPA cannot accept a degree of housing on the Sidford site (Sidm_27), then the proposed investment in the Alexandria Industrial Estate would be unachievable. In order to deliver employment investment at Sidford, without a capital receipt from Alexandria Industrial Estate (which was previously envisaged), the Sidford site may need to be intensified for employment.
 - The Policy Team are requested to review this representation and application 22/2063/MOUT, which details why the rewording of the policy associated with the two allocations is desirable if employment need is to be facilitated by viable levels of investment. Equally a shift in the nature of the allocations can relieve/improve the capacity to find suitable, available and achievable land for approximately 50 houses.
- The land is within the AONB and should be safeguarded from development.

LP_Sidm_09 - Land east of Two Bridges Road incorporating Sidm_08, Sidford - Rejected Site

- The Town Council does not support the allocation of employment land within the AONB at Sidm_09.
- Not supported - The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is protected within the Sid Valley Neighbourhood Plan. The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas.
- Development here would increase traffic through the narrow A375 into the cross roads at Sidford. This already has problems with long tailbacks.
- Run-off would increase the River Sid water levels and increase flooding for Sidford and Sidmouth properties.
- Further development in this area following that recently granted permission at national level must take into account the impact on a road that is only a status because it connects the towns of Sidmouth and Honiton. It does not have the capacity nor structure

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

LP_Sidm_12 – The Hams, Fortescue Road, Sidford - *Rejected Site*

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

LP_Sidm_13 - Land adjoining Fortescue Road, Sidmouth - *Rejected Site*

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

LP_Sidm_14 - Land adjacent to Stevens Close, Sidford - *Rejected Site*

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

LP_Sidm_16 - Sidmouth Garden Centre, Stowford - *Rejected Site*

- Support for rejection.

LP_Sidm_17 - Peak Coach House (Numbers 1-3 Belfry Cottages), Cotmaton Road, Sidmouth - Preferred Allocation

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

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

LP_Sidm_18 - Land north of Sidmouth Garden Centre, Stowford - *Rejected Site*

- No comments

LP_Sidm_19 - Land at Dark Lane, Sidmouth - *Rejected Site*

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

LP_Sidm_20 - Station Yard, Station Road, Sidmouth - *Rejected Site*

- No comments

LP_Sidm_22 - Alexandria Industrial Estate, Alexandria Road, Sidmouth - *Rejected Site*

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

LP_Sidm_24 - Land east of Two Bridges Road and north of Sidm_08, Sidford (the central portion of Sidm_09) - Proposed Employment Allocation

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

This proposal is strongly objected to as -

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

LP_Sidm_28 - Church Street Car Park, Sidford - Rejected Site

- No comments

LP_Sidm_30 - Land at Redwood Road, Sidmouth - Rejected Site

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

LP_Sidm_31 - Land north of Cornfields, Sidford - Rejected Site

- The conclusions to disregard this site on landscape grounds are somewhat surprising, given the proximity of the adjacent housing development which lies to the east and south of the site. The East Devon AONB boundary has been tightly drawn around Sidford, and as such most new housing development to support the housing requirements for Sidford and the wider hinterland of Sidmouth is going to extend into the AONB. There is not an in-principle objection or bar on development in AONBs and this reflected in the application approval for the sited referenced LP_Sidm_08, which lies to the west of the site (LP_Sidm_31) being supported under this representation. In allowing the appeal for the site referenced LP_Sidm_08, the Inspector only had to substantively deal with highway matters. The impact on the AONB, was confined to other matters and the development which was extensive was not considered to have an adverse impact on the AONB. The site was allocated and therefore the development was acceptable in terms of the impact on the AONB.
- When considering the extent of the impact of the LP_Sidm_31, as previously stated the site is well related to the existing settlement with housing to the south and east. The development of this site would clearly be seen in the context this development. Thus, the impact on the on the AONB is considered to be limited. Additionally, the northern boundary of the site has mature tree coverage which will screen the development and integrate the site into the landscape with little or no impact on the AONB. Furthermore, it will have been noted that the site slopes down from the north to the south, thus reducing any potential impact on the character of the AONB. Therefore, it is considered that the reasons for not allocating the site are essentially unfounded and the Council are requested to reconsider their position and to allocate the site.

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

LP_Sidm_35 - Land north of Sidford High Street - *Rejected Site*

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

Omission sites at Sidmouth

- None identified.

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



PDF 4 of 10

Chapter 6 (Part B) – Strategy for development at Local Centres

Pages 213-247

July 2023

Policy 25 - Development at Local Centres

Policy 25 of the local plan provides for and allocates land for development at local centres.

General issues (not relating to individual settlements)

- Too much development is identified for all five Local Centres, albeit Lympstone may be suitable to accommodate more given its train station.
- Agree with modest development to increase population and support local centres but think more development should be identified to support local amenities.
- The smaller Local Centres of Broadclyst, Lympstone, Woodbury have too much growth, a disproportionate amount, in addition to a new settlement in the area.
- The larger centres of Budleigh, Colyton and Woodbury should have more houses, jobs and services allocated to them.
- The East Devon AONB team state that Budleigh Salterton is fully within and Woodbury is very close to the East Devon AONB and proposals at these locations should be accompanied by an LVIA or landscape appraisal to consider the effects of the proposals on the AONB.
- National Highways anticipate the strategic road network can accommodate the level of growth proposed at other Main Centres, Local Centres and Service Villages, but expect a high-level transport assessment for the entire Local Plan to provide evidence.
- Devon County Council comment that secondary and SEND contributions arising from development proposed near to the new community (e.g. Woodbury) will need to be invested in the new community.
- Sid Vale Association - The policy has to be justified by showing that there will be a demand for 2.4 Hectares of Employment Land in Sidmouth, Sidford and Sidbury as otherwise there is the risk the land could be used for residential purposes by default. Our local market experience and knowledge is that there is no demand for more Employment Land in the Sid Valley.
- The Avenues Residents Association advise - Supporting existing villages may lead to the destruction of such communities because of the need for an iterative process to allow them to flourish and grow. Lack of development may hinder their future. Such an approach leads to greater development in towns and thus a movement of village populations to towns where facilities are available. It is important to enhance village services to allow them to survive. Development of towns may cost villages in the future.

Broadclyst - General issues

- Devon County Council (DCC) are concerned about the ability to support the proposed level of development due to impact upon primary and secondary school provision in Broadclyst.
- Fail to see the similarities between Broadclyst (one shop) and other settlements in this policy.
- Broadclyst Parish Council -
 - One of the biggest concerns of residents is that increasing the size of the village by 15% will put intolerable pressure on already struggling local services. It is felt that development on this scale, far from enhancing the vitality of the local community, is likely to be detrimental. Without remedial action, a swell in population will be especially difficult for the local primary and secondary schools (all full), and the GP surgery (at capacity).
 - We would like EDDC to establish a protected Green Belt around any potential new development to prevent more urban creep. It is worrying for residents to see so much urban expansion around our village, and it is felt that if this is not done, it misses an opportunity to allow Broadclyst to retain its special and unique character, without which it is destined to become a suburb of either Cranbrook or Greater Exeter in the decades to come.
 - If the Planning Authority is mindful to include sites 12 and 29 in its Local Plan, proposals should be drawn up for effective mitigation of the impact of additional traffic movements on Crannaford Lane. Multiple additional roads identified with specific adverse impact from potential development.
- The proposed amount of development will swamp the existing settlement due to load on local services and transport links.
- The village is served by narrow, often winding lanes with poor visibility. There are occasional passing places. Pavements in the centre of the village and surrounding lanes are patchy and inadequate and there is no designated provision for cyclists.
- Concern expressed over pedestrian and cyclist safety.
- Concern expressed over school traffic with congestion and further safety concerns.
- Concern over facilities and infrastructure being at capacity including surface water and sewage management, doctors, schools, road network, education provision, transport.
- The suggested area for development is frequently waterlogged in wet weather and a footpath crossing the fields is often unusable. The lanes alongside this land flood regularly during the winter to the point of being impassable by foot or by car. The floods are not transient and can be slow to drain over days or weeks. Run off water from a large housing development would exacerbate this problem.
- The housing developments in Cranbrook and Westclyst should be sufficient to prevent further building in areas with unsuitable roads and pavements.
- The proposed development of concentrated modern housing would engulf the historical setting of the village, whose character would be damaged and lost for ever.

- The rural setting of Broadclyst offers the local community and visitors the pleasure and health benefits of walking and cycling in the beautiful countryside. These activities were essential for physical and mental well-being of residents during the recent pandemic. The development proposed would impact on the health and wellbeing of local residents and visitors.
- The BUA boundary for Broadclyst in the Broadclyst Neighbourhood Development Plan and the adopted EDLP does not include the preferred sites LP_Brcl_09, LP_Brcl_29 and LP_Brcl_12, but the proposed EDLP seems to have redrawn the boundary (now referred to as a Settlement Boundary) to include these sites. There is no justification to this redrawing and I feel it is misleading and intended to deceive so as to provide justification for development on these 3 preferred sites in accordance with paragraph 3.75 of the proposed EDLP. The original BUA boundary for Broadclyst should be retained when considering development.
- The figure of 175 houses for Broadclyst is totally contrary to the Broadclyst Neighbourhood Development Plan which suggested only 44 houses. There is no justification provided in the proposed EDLP as to why this figure of 44 is no longer relevant.
- The area supports a wide range of birds, insects and wildlife which would inevitably be diminished by the transformation of the village to an urban environment. The preservation and protection of wildlife habitats is essential in the long term for the survival of the planet as acknowledged by Michael Gove in the new measures for the Levelling up and Regeneration Bill (Dec 2022)
- The proposed area of development would involve the loss of rich agricultural land.
- A housing development would lead to the permanent loss of valuable green spaces.

LP_Brcl_09 - Land at Heathfield (south-east of Woodbury View), Broadclyst - Preferred Allocation

- DCC note this has been previously considered by them as the LLFA and is proposed to be allocated in the Neighbourhood Plan.
- Broadclyst Parish Council – Brcl09 received majority support for development from the community in every round of consultation and is in the final draft as a site for 15 homes. It is considered proportional and natural extension to the village, and although any development brings pressure on infrastructure, it was felt that the allocation of an additional maximum of 15 homes was not significant.
- A number of representations objected to the development, with concern over safety, overcrowding, infrastructure issues, flooding, congestion, dangerous roads, increased school run traffic, loss of green space, residents from other towns and villages already using Broadclyst facilities (schools and doctors' surgeries).

- A number of representations expressed concern over the loss of agricultural land, suggested as at odds with government guidance.
- This is a beautiful and desirable area. Development of this area would only provide homes for wealthier people, would add increased load to the already overstretched infrastructure, ruin the countryside, attract residents from outside the local area and would not provide affordable housing. It should NEVER be considered for development!
- There would be a big ecological and environmental impact on the area and would result in a loss of a lot of green space and habitats which are currently home to lots of different wildlife, including bats, birds, butterflies and insects. The proposed site itself is an area of farmland with mature trees and hedgerows, supporting rich wildlife. The loss of habitat would be devastating.
- The BUA boundary for Broadclyst in the Broadclyst Neighbourhood Development Plan and the adopted EDLP does not include the preferred sites LP_Brcl_09, LP_Brcl_29 and LP_Brcl_12, but the proposed EDLP seems to have redrawn the boundary (now referred to as a Settlement Boundary) to include these sites. There is no justification to this redrawing and I feel it is misleading and intended to deceive so as to provide justification for development on these 3 preferred sites in accordance with paragraph 3.75 of the proposed EDLP. The original BUA boundary for Broadclyst should be retained when considering development.
- A number of representations in support of the allocation.
- Of the three developments proposed for the area, this one seems the least offensive. That being said, it would be okay if this was the only site proposed, that which it isn't. If developments like these are taking place, the impact on local facilities (employment, GPs, schools, buses, social areas) needs to be seriously considered, it seems to have been just brushed aside.
- I feel that this site is of a size and in a situation which is acceptable to the character of the village. The access is reasonable and the number of dwellings should not place an inordinate strain on local resources.

LP_Brcl_12 – Land west of Whimble Road, Broadclyst - Preferred Allocation

- The Environment Agency advise that the area of floodzone 2 to the northwest of the site should be secured as green infrastructure and be kept free of built development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.

- DCC seek clarification on the function and approach to the existing 'pond' which is unclear if this forms part of the allocation.
- Object to Brcl_12 as flooding in the area will only be made worse if this site is developed.
- Roads are not suitable for extra traffic from Brcl_12.
- Brcl_12 will ruin the countryside on this rural side of the village.
- Owner of the New Inn pub objects as housing development, rather than countryside, will discourage visitors from visiting the pub and adversely affect the business.
- Loss of grade one agricultural land a concern.
- Loss of biodiversity a concern, including loss of pond on this site.
- Broadclyst Parish Council -
 - In the Clyst Vale Regional Park consultation document there was specific mention of the Winter Gardens site (LP_Brcl_12) as being an important habitat for invertebrates. We therefore would like to see a full environmental and biodiversity impact assessment, commissioned prior to development being agreed, and a proper plan for mitigation if development is allowed to go ahead.
 - Site Brcl 12 was presented for consideration during the Call for Sites as both a housing site and an economic site.
 - Housing: following an external consultant's desk-based analysis on the proposed sites, Broadclyst NP steering group was advised that site 12 was too big to bring forward through a NP and should therefore be removed from the Broadclyst NP.
 - Economic: consultation responses for economic re-development of the buildings were as follows:
 - a. Quantitative: with 61% of votes in favour, this site has the support of the community.
 - b. Qualitative data:
 - i. Good support for employment use and to support small businesses;
 - ii. The loss of agricultural land is not a material consideration;
 - iii. The environmental impact will be assessed by AECOM;
 - iv. Support for regeneration of brown-field site;
 - v. Concerns about access and additional traffic;
 - vi. Consider a condition for no B8 use
 - vii. Village is sustainable location;
 - viii. Development to be subject to noise impact assessment and mitigations if necessary
- Agent for Land Value Alliances (Developer) -
 - We consider that this site is a suitable location for development in light of the everyday facilities available in Broadclyst itself, as well as the sustainable transport links available to access both Exeter and Cranbrook via cycling and public transport.
 - Given the scale of the site (circa 12 hectares), and in order to achieve sufficient density on the land for housing (30dph), we suggest that draft policy 25 should be amended to

increase the number of homes from 136 dwellings to 160 dwellings, which is considered to be a more appropriate level of development. LVA are also flexible in terms of the mix of housing to be provided on site, including (for example) bungalows, if the authority so desires it – as well as self-build and smaller units.

- A high number of representations object to the allocation citing:
 - Adverse impact on the local road and transport network with safety concerns for pedestrians, cyclists, and motorists alike.
 - Adverse impact on local facilities infrastructure including doctors and schools.
 - Environmental impact of building on GREEN FIELD sites, with impacts on biodiversity and loss of green space.
 - Increase in light pollution from construction phase and post build out
 - Loss of Grade 1 agricultural land.
 - Adverse impact on flooding and local sewage network.
 - Impact on local heritage.
 - Impact on the character and rural appearance of Broadclyst.

LP_Brcl_18 - Land at Church Lane, Broadclyst - *Rejected Site*

- No comments.

LP_Brcl_22 – Land at Jarvishayes Farm, Broadclyst - *Rejected Site*

- Surprised to see this site rejected after locals had put it forward through the Neighbourhood Plan. It is of a much smaller scale than the sites proposed on the other side of the village, with good access off the B3181, and is unlikely to require such major infrastructure and flood relief changes. Decision to reject is however supported.
- Two further representations questioning the decision to reject, suggesting that the site has much better access to the village services, footpaths, public transport etc. than the other recommended large sites within the village and would be a scale much more in keeping with the village.

LP_Brcl_29 - Land to the east of Town End, Broadclyst - *Preferred Allocation*

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with

national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to the letting of Lake House

- Object as located on a very narrow road without footpaths.
- These fields are often covered in surface water which will only be displaced if houses are placed here.
- The National Trust this policy identifies land to the east of Town End as a preferred allocation for 24 new homes and 0.1 hectares of employment land (allocation reference Brcl_29). They advise - this site is owned by the National Trust as investment land that was donated specifically to fund conservation work on the Killerton Estate. It has always been The National Trust's intention to sell this investment land when an appropriate opportunity arose. For this and adjoining land Brcl_12 the trust advise they would support specific policy requirements, applicable to both sites, to secure high quality development which; respects the local identity of Broadclyst; protects the setting of listed buildings; ensures that sustainable pedestrian and cycle links are provided and wider sustainable links to green infrastructure. They support masterplan production and advise site mapping needs updating.
- Broadclyst Parish Council -
 - Site Brcl_29 was found by the desk-based assessment to be acceptable for delivery through a NP and progressed through to the first round of public consultation. However, access to the site was a major concern and the site only received support from a total of 31% of consultation respondents, so was withdrawn by the Steering Group and did not progress any further in the draft Neighbourhood Plan.
 - There are concerns that development on this scale could be detrimental to the intrinsic character of the village, particularly the historic Eastern side of Broadclyst, abutting the proposed sites. This part of the village has many listed and thatched buildings. In particular, with reference to site LP_Brcl_29, any development here would have a direct impact on Lake House which is Grade 2 Listed. The land proposed is also on an elevation that could dominate the surrounding environment. If development is allowed to go ahead, we suggest it must be in keeping with the historic setting and adhere strictly to the design codes set out in The Broadclyst Parish Neighbourhood Plan.
 - Loss of grade one agricultural land a concern.
 - Concern that the local highway infrastructure could not cope with the development.
 - Lack of safe pedestrian routes a concern with potential to encourage car usage.
 - A high number of representations object to the allocation citing:
 - Adverse impact on the local road and transport network with safety concerns for pedestrians, cyclists, and motorists alike.
 - Adverse impact on local facilities infrastructure including doctors and schools.
 - Environmental impact of building on GREEN FIELD sites, with impacts on biodiversity and loss of green space.
 - Increase in light pollution from construction phase and post build out

- Loss of Grade 1 agricultural land.
- Adverse impact on flooding and local sewage network.
- Impact on local heritage.
- Impact on the character and rural appearance of Broadclyst.

Omission sites a Broadclyst

- None identified.

Budleigh Salterton - General issues

- Budleigh Salterton Parish Council express concern about the proposal for 152 homes because it would put unacceptable strain on the medical resources in the town, which also serve the surrounding villages.
- A respondent comments - This consultation shows planned development on what was described as green wedges in the Budleigh Salterton Neighbourhood plan, a plan that was voted on in a referendum by the people of Budleigh Salterton. It looks like East Devon is not referring to this plan? What am I missing here?
- The proposed growth of Budleigh Salterton means it risks losing its distinctiveness and just becoming a suburb of Exmouth.
- Proposed development at Budleigh is totally out of proportion.
- Wain Homes consider that Budleigh suffers from acute housing need, poor housing affordability and an ageing population. It also points out that the town is washed over by the AONB, such that any new development will be in the AONB.

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

LP_Budl_01 – Land adjacent to Clyst Hayes Farmhouse

- Budleigh Salterton Parish Council oppose any development on this site because it is in the AONB, grade 1 agricultural land, would add to traffic congestion on B3178 and the primary school is over subscribed.
- Budleigh Salterton Parish Council state that one of the reasons the town was included in the AONB was because of the attractive vistas and views afforded of the local countryside in this area.
- Devon County Council query whether green infrastructure should be provided, and development may require a sewer requisition to the watercourse if infiltration is unfeasible.
- A large site outside the town boundary.
- A few respondents consider the site an attractive and important green wedge for the town.
- Gives this part of Budleigh a semi-rural character.
- Some respondents expressed concern about the impact of additional cars on Knowle Road where traffic is already a problem.
- Would undermine attractive character of area.

- Development would add to flooding issues.
- Dark Lane is a medieval track.
- AONB location.
- Some respondents were concerned about the loss of good quality agricultural land.
- Plenty of brownfield sites and empty buildings in north.
- Very sensitive location – don't destroy every piece of green space until Budleigh's unique character is gone forever.
- 300 homes would be unacceptable on traffic grounds but would support 50 homes with road improvements where narrow.
- The landowner supports the allocation of this site for housing. It is deliverable as a housing site and is well related to the existing built up area. It is well provided with facilities and there is a strong need for a mix of new housing including affordable housing.

LP_Budl_02 - Land at Barn Lane, Knowle - Potential 'Second Best' Allocation

- Budleigh Salterton Parish Council oppose any development on this site, which is grade 1 agricultural land, in a drinking water protection zone and could be at risk of flooding.
- Budleigh Salterton Parish Council state that one of the reasons the town was included in the AONB was because of the attractive vistas and views afforded of the local countryside in this area.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Wain Homes, which controls the site, comment that;
 - The site abuts the BUAB on two sides and is sustainable in other respects.
 - The characteristics of Budleigh and its surroundings and the scale and nature of the site and the proposed development indicate clearly that the scheme would not be "major" development in the AONB.
 - Landscape and other effects can be adequately mitigated.
 - The site could deliver about 50 market and affordable homes, public open space (including play space), safe access and off-road pedestrian and cycle connections to the town centre. This would represent a 2% increase in population for the town.
 - The site is relatively self-contained and the effects on long and short views and on the wider AONB can be mitigated through layout, design, materials and landscaping.

- All other effects can be mitigated, with the exception of the loss of agricultural land where any harm arising would be considered in the context of the remaining provision of best and most versatile land and would weigh in the planning balance against a range of public benefits arising from the scheme.
- Some respondents object as in the AONB.
- Object as too far from the town centre.
- Contrary to local plan policy because would not conserve or enhance the character and natural beauty of the AONB.
- Loss of good agricultural land.
- Allocation of this scale is not required.
- Site is in a drinking water protection zone.
- Inadequate pavement provision for site to the west.
- The landowner supports the allocation of this site for housing. It is deliverable as a housing site and is well related to the existing built up area. It is well provided with facilities and there is a strong need for a mix of new housing including affordable housing.

LP_Budl_03 - Land at Barn Lane, Knowle - Potential 'Second Best' Allocation

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to key views from principle elevation of Grade 2* Tidwell House
- Some respondents object as in the AONB.
- Object as too far from the town centre for older people.
- Loss of agricultural land.
- Contrary to local plan policy because would not conserve or enhance the character and natural beauty of the AONB.
- Roads inadequate.
- Allocation of this scale not required.
- The landowner supports the allocation of this site for housing. It is deliverable as a housing site and is well related to the existing built up area. It is well provided with facilities and there is a strong need for a mix of new housing including affordable housing.

LP_Budl_04 – The Old Orchard, Halse Hill - *Rejected Site*

- Budleigh Salterton Parish Council oppose any development on this site.
- Budleigh Salterton Parish Council agree that the site is unachievable and forms part of a green wedge designated in the neighbourhood plan. Green Wedges such as this site were instrumental in AONB's decision to include the whole of Budleigh Salterton in AONB.
- Will reappear as a 'windfall'
- Next to conservation area with protected trees on boundary.
- Opposite important woodland.
- Should be included in the conservation area so that it is protected.
- Site unsuitable and could flood.

LP_Budl_05 - Little Knowle - *Rejected Site*

- Budleigh Salterton Parish Council oppose any development on this site, which is adjacent to a green wedge, is at risk of flooding and the existing field forms an attractive feature in the street scene.
- Site unsuitable due to flooding.
- Dark Lane unsuitable for additional traffic and of historical and geological interest.
- Road network unsuitable for additional traffic.
- Would damage character of AONB.
- Poor access and visibility.
- Attractive field.
- SWW has a holding tank on part of the site.
- Erosion of rural environment.
- Should be left as attractive feature in street scene.

LP_Budl_06 - Budleigh Salterton Community Hospital - *Preferred Allocation*

- Budleigh Salterton Parish Council oppose any development on this site, which had been earmarked for closure, but is now a community health hub.
- Many respondents object to any loss of a much used and highly valued health and community facility.

LP_Budl_07 - The Old Smithy, Dalditch Lane - *New Site - not assessed*

- Budleigh Salterton Parish Council agree that this site is not suitable for development.
- The Environment Agency advise that the site is within floodzone 3 and would need to be subject to SFRA2, and the sequential and exception tests before being allocated.
- Would destroy quiet rural aspect on outskirts of town and encourage urban expansion.
- Agree should not be allocated but should be considered for self-build.

LP_Budl_08 - Lower Station Road Car Park - New Site - not assessed

- Budleigh Salterton Parish Council oppose any development on this site pending the result of the HELAA as it is a well used car park that reduces congestion.
- Loss of parking.
- Should remain to serve the public hall.
- Unusual shape not suited to housing.
- Increase in traffic from residents would endanger the users of the hall.

LP_Budl_09 - Brook Road car park - New Site - not assessed

- Budleigh Salterton Parish Council agrees that this site is unsuitable for development because of its size and the risk of flooding.
- The Environment Agency advise that the site is within floodzone 3 and would need to be subject to SFRA2, and the sequential and exception tests before being allocated.
- Invaluable parking close to High Street for the infirm.
- Should be kept for original use.

Omission sites at Budleigh Salterton

- None identified.

Colyton - General issues

- Scale of development at Colyton and Colyford will adversely impact on River Axe SAC/water quality due to poor quality sewage system.
- Colyton's infrastructure cannot cope with more housing – the primary school is full, lack of car parking.
- There is no need for more housing as the EDDC Housing Needs Survey (2022) states there is a need for 12 affordable homes which will be met by 14 affordable homes at for CeramTec site.
- There are already two new developments on Coly Road (Saxon Meadow, land at Yaffles), plus the imminent 72 homes and 6 business units at former CeramTec site, so Colyton does not need any more housing.
- Lack of jobs in Colyton means residents of new housing will have to commute elsewhere.
- Coly_02 were rejected at appeal, too far to walk into town centre, loss of privacy due to level differences and spoiling views of AONB.
- Roads not suitable for extra traffic.
- A smaller amount of development is proposed at Colyton compared to other local centres, no explanation as to why.
- Proposed sites at Colyton are of Great Landscape Value and highly visible from across the Axe Valley and would erode the rural setting of Colyton.

LP_Coly_01 - Land to the west of Fair View Lane - Rejected Allocation

- One respondent criticised the use of the term “too remote” as a reason for rejecting the site.

LP_Coly_02a & LP_Coly_02b - Land at Hillhead - 2a Preferred Allocation / 2b Potential ‘Second Best’ Allocation

- Reasons for objecting to this site included the loss of scenic views, the negative impact on the East Devon AONB, the capacity of the sewage system / water run-off (increasing the risk of flooding), the damage to local wildlife habitats (including the adverse ecological effect on the Beer Quarry Caves SAC) and ancient hedgerows, the loss of farmland, pressures on the local school, access (both vehicular and pedestrian), lack of public transport and new employment opportunities, that the site is on land outside of the development area and the increase in traffic and light & air pollution.

- Other comments made reference to the prominent position of the site (above 200ft) and the potential for views into the site from the AONB being spoilt. Respondents said development would be harmful to the landscape and also damaging to the setting of Colyton itself.
- One respondent said that housing quotas in the Colyton Neighbourhood Plan should be used as the benchmark rather than the new Local Plan, whilst another said Government targets were now “advisory” rather than “mandatory” and should be treated as such. Others said development of this site would be contrary to policies in the Colyton NP, which should be respected.
- Another comment said houses should be built where there are employment opportunities, in places such as Exeter, Honiton or Axminster, rather than Colyton.
- There was a feeling that development would erode the existing “marked and abrupt transition” from town to countryside and that new homes would be too far away from facilities.
- Reference was made to a scheme for large-scale housing on this site that had previously been rejected (15/1758/MOUT) due to the site’s location in the countryside and its acknowledged value to the landscape setting of the town. One respondent referred to the site being in the Local Plan 1995-2011 as an Area of Great Landscape Value, so questioned why it could now be seen as suitable for development.
- Another criticism was that the allocation would not meet the sustainability objectives of the NPPF, which are “interdependent and require land to be co-ordinated with the provision of associated infrastructure and contribute to protecting & enhancing the natural environment”.
- Many suggested that Clay Lane is unsuitable to accommodate the additional traffic that this development would generate. It was noted that Hillhead is steep and not conducive to walking into town, and that there was blind corner access from Hillhead to Old Sidmouth Road, with considerable on-road parking at the junction with Burnards Field Road (with a lack of parking for existing bungalows there).
- Reference was also made to existing properties losing privacy, as new dwellings would overlook directly into bedrooms, light would be lost in gardens and that there would be increase in noise & traffic danger on Hillhead.
- It was suggested that there is still sufficient opportunity within the boundaries of Colyton to meet need in the foreseeable future.
- On a positive note, some respondents were keen to point out that the new owners of the site has committed to taking care in regard to any drainage, traffic and access issues, and that a well-built and environmentally friendly proposal, in conjunction with reasonable purchase costs, would be of benefit for local people (particularly first time buyers or those in need of affordable housing).

LP_Coly_03 - Land adjacent to Fair View Lane - *Rejected Site*

- One respondent suggested this site would be a better option to develop than Hillhead (Coly_02) whilst another respondent suggested Coly_06 would be a better option.
- Other concerns included the capacity of the primary school (with Coly_06 the suggestion for the location of a new school) and the adequacy of the sewage system.
- Developer (Baker Estates) not clear why this site has not been allocated as would be delivered to a high standard.

LP_Coly_06 - Land to the east of Colyton - *Rejected Site*

- Prefer this site for new housing rather than Coly_02.
- There was criticism that this site was rejected on the grounds of being in a flood zone when permissions had been granted in close proximity which are also in the flood zone.

LP_Coly_07 - Land to the east of Fair View Lane - *Rejected Site*

- One respondent agreed with the decision to reject the site, making reference to the amount of wildlife in the area.

LP_Coly_09 - Land adjoining Clay Lane - *Rejected Site*

- Respondents agreed that this site should be rejected for development because of the beautiful surroundings, visibility of the site, loss of farmland, the wildlife present on site and its use as a favoured area for walking.

LP_Coly_10 - Land on the east side of Apple Orchard - *Rejected Site*

- No comments

Omission sites at Colyton

- None identified.

Lympstone - General issues

A very high number of residents provided detailed objections to the multiple sites proposed within Lympstone parish. These sites included those listed below and a number of sites included in the assessments for sites to the north of Exmouth. Comments are included below.

- Devon County Council are concerned about primary school capacity at Lympstone.
- Lympstone Parish Council held an open session in November 2022 to inform residents and invite their responses to the Draft Local Plan. During the public session, the residents, when asked for their main considerations for giving a view on a proposed site, overwhelmingly listed:
 - A376 already at capacity;
 - Maintaining Green Wedges and Coastal Preservation areas;
 - Access to proposed sites;
 - Required Infrastructure;
 - Flooding (please see supporting evidence from Lympstone Flood Resilience Group's own report in the Annex at the end of this report.);
 - Maintaining Exmouth / Lympstone gap – no coalescence.
- From the Lympstone PC consultation event:

Reaction to proposed sites for Lympstone (values rounded to whole numbers – in descending order of opposition)

Site name and number of houses proposed by EDDC	YES %	NO %	No Preference Expressed or judged Possibly %
Lympstone 07 100 houses	7	86	7
Lympstone 08 14 houses	19	81	2
GH/ED/72 131 houses	19	79	2
Lympstone 10A 75 houses	14	79	7
Lympstone 09 54 houses	17	76	7
Lympstone 14 59 houses	31	60	10
GH/ED/73 46 houses	40	57	2
Lympstone 01 14 houses	43	48	10
GH/ED/75 6 houses	52	36	12

- A site promoter supports allocations in tier 3 settlements, particularly where there are good sustainable transport links such as at Lympstone. They consider that the villages have been under provided for in past Local Plans and therefore appropriately sized allocations such as GH/ED/73 are needed to deliver local housing needs and to support the vibrancy of villages and their services.
- Concerns that proposed development at Lympstone would place excessive strains on services and facilities.
- The gap between Lympstone and Exmouth should not be eroded and accommodate development.
- New housing in and around Lympstone is disproportionate to the existing village.
- Development will overwhelm the resources (school, GP) and infrastructure (surface drainage, sewerage, roads).
- RD&E is already at capacity, and there will never be sufficient infrastructure of any type in Lympstone village to support that amount of increased housing, traffic and families such as their need for schools, doctors surgeries, parking etc. It also obliterates the green wedge which negatively impacts on wildlife, health and wellbeing.
- Proposals ignore the Lympstone Neighbourhood Plan.
- Proposals will add to traffic on the A376 which is already seriously congested / at capacity, particularly with other proposals to develop Exton and Exmouth.
- There is minimal employment in Lympstone so new housing will mean out-commuting.
- Most of Exmouth's development is being pushed into Lympstone parish.
- The real number of homes being allocated to Lympstone is 499, as a further 202 houses are in Lympstone parish but allocated to Exmouth.
- Planned development goes against neighbourhood plan and is on green wedge, agricultural land and more that 2 miles from village centre.
- Affordable homes need to be addressed. Homes already built in Lympstone are way out of affordable homes for the upcoming young in our village school.eg homes by the church all out of the price bracket for young with growing families.
- National Highways anticipate growth here to be significantly Exeter facing, creating commuter and leisure trips through M5 Junction 30, and future discussions with National Highways is required on transport assessment and potential mitigation.
- The health, well-being and quality of life of Lympstone residents, and of those in the west of East Devon, has been disregarded. The result is a report that erodes trust and leaves residents feeling ignored, disheartened and helpless
- Communities recognise the need for development but members and officers of EDDC should be seeking organic, sustainable and equitable growth across all of East Devon. Respect the views of communities and work with them to achieve a way forward that is agreed rather than imposed.

- Communities like Lypstone deserve the opportunity to thrive and survive rather than be buried in inappropriate housing simply to shelter other areas of East Devon from any development.
- The plan states 'proximity to employment' as a reason for development. Lypstone is a village and provides minimal employment. These houses, outside Lypstone and Exmouth BUABs, will be habited by absent property investors, second-homers, holiday lets and commuters to Exeter and further afield. They will not be part of Lypstone or Exmouth.
- For your information, a FoI request showed that as at 20 May 2022 there were 2,637 second homes in East Devon and of these 603 (23%) were in the Exmouth and Lypstone parishes. In addition, at the same date there were 1,909 Empty properties in East Devon and 491 (26%) of these were in the Exmouth and Lypstone parishes. It is likely that one quarter of any development will provide second homes rather than needed primary homes for residents.
- As a Lypstone resident I am concerned and alarmed that Lypstone has been designated as a 'Service Centre' and that this is then used as the basis to allow a much greater level of development, including provision of industrial and commercial buildings as part of new development. Putting Lypstone on a par with, for example, Budleigh Salterton, is clearly wrong; Lypstone, with one shop and one part-time art gallery and no through roads lacks any reality as a 'service centre'.
- On the proviso that you are able to make the substantial investments in infrastructure required before significant development we think the best place to build new houses in or around Lypstone is on your 'Second Choice' site adjacent to Courtlands Lane. Overall, we feel this site would have a less deleterious impact on Lypstone than your 'Preferred' option either side of Meeting Lane.
- Around 200 of Exmouth's housing allocation are sited in Lypstone, not Exmouth.
- Lypstone is choked with traffic and has no available space for development.
- Object to proposed development at Exton and Lypstone as it would impinge on the green wedge and adversely affect their character.
- Agent for the landowner - The overall rationalisation of the Built-up Area Boundary, both to reflect previous built development and to identify suitable locations for additional future development, is considered reasonable and justified.

LP_GH/ED/71 - Gulliford Farm, Exmouth Road, Lypstone - Rejected Site

- It would ruin the character of the village, taking away rural green areas. Poor access and unsustainable location, not near rail. No jobs or shops anywhere near it. Dramatically increases traffic and cars on busy A376 and roads into Lypstone.

- Far too big to be tacked on to Lympstone Village. The infrastructure for the village (school, roads, community centres) is at capacity. A development of this magnitude cannot be tagged on with considerable negative impact on this infrastructure. Lympstone also prides itself on its sense of identity - the is maintained by its green field separation from neighbouring towns, villages, and other developments. This proposal joins up Lympstone to Nutwell Lodge, eroding that a distinct village community.
- Prime agricultural land needed for agriculture .Only access is onto A376 which is easily gridlocked. Frequently floods on to adjoining roads. Infrastructure not I place to support more people eg health and education.
- Good access on bus routes. Hidden from main road view.

LP_GH/ED/72 - Land at Meeting Lane, Lympstone - Preferred Allocation

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to setting of Nutwell Court and registered park.
- DCC state a culverted unmapped ordinary watercourse appears to cross centrally through the site and should seek opportunities to daylight and enhance this watercourse.
- A significant number of objections were received.
- This development will have a huge and negative impact on the health and wellbeing of Lympstone Parish residents.
- Lympstone PC -
 - This site is in Woodbury Parish but, if it is adopted, will impact Lympstone far more. Woodbury PC passed a motion to pass CIL money to Lympstone if this development is built but this intention could be rescinded and there is no regulation in place to ensure payment would happen.
 - As this development would sit in Woodbury Parish, precepts would pass to Woodbury and this is unacceptable as all the strain falls upon Lympstone. Lympstone's services and infrastructure would be unfairly strained if the site proceeded.
 - Even when asked if development took place on this site and it guaranteed provision of sports facilities and the dangerous junction accessing the A376 addressed, 60% still opposed development here and in GD/ED/73.
 - Heading south on the A376 this site is clearly visible. 131 houses will completely scar the rural landscape, impact the approach to Lympstone and change the character of the north

side of the village (as referred to in historic documents covering Nutwell Court and Gulliford Farm).

- The allocation is contrary to the neighbourhood plan approved in a local referendum. As a parish, we were assured that if we took the time to create a neighbourhood plan, this would protect the nature of the village from unwanted development. However, the built-up boundary for Lypstone has been quietly altered by EDDC with no local consultation
- The agent on behalf of the site owners has submitted a number of technical documents (relating to flooding, ecology, drainage and highways/access) to support their submission that this site is suitable for development. They object to the requirement for a mixed use scheme to incorporate 0.52ha of employment.
- I am a private resident of Glebelands road Lypstone. The impact of building directly behind us will not only be felt by a decrease in my property value, my and my family's wellbeing of having to endure living behind a major building site for a protracted period.
- The GH/ED/72 – 73 and 75 sites, which I am sure many residents are unaware of, are within the Woodbury Parish Council so therefore, Woodbury Parish Council would be collecting income and making decisions which impact on Lypstone rather than their own village. These sites will not be counted towards Lypstone quota and more housing will be required to fulfil Lypstone's quota of housing, this is very detrimental to Lypstone.
- Suggestions in the report of easy access to bus and rail and employment opportunities are unrealistic and presented in a misleading manner. Car use will be the norm for persons to travel to work on already overcrowded roads.
- The current infrastructure struggles to cope and schools, GPs, roads, public transport, flooding, drainage, sewage will be impacted upon. Few, if any, other areas of East Devon are being impacted upon in such a significant and disproportionate manner. Additionally, the A376 and RD&E hospital are both at capacity.
- Residents at this site suggested as remote from village core and therefore reliant on cars for travel.
- Housing density of site as proposed suggested a too high.
- The development will have significant negative effects on the environment.
- Farming land will be lost and the Coastal Preservation Area will be built upon and permanently lost – this directly contradicts your policy.
- Loss of ancient meadow land with flood implications.
- The green wedge between Lypstone and Exmouth will be seriously eroded; this directly contradicts your policy. It will accelerate the coalescence of settlements, destroying the sense of place and identity for residents.
- The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents.
- Valuable wildlife corridors will be lost / loss of biodiversity.
- Important areas of landscape and visual amenity will be lost forever.

- A small number of comments expressed support for the site.
- Out of other sites this site does adjoin houses already and would look like a natural extension.
- A new access would be good along Nutwell road but Meeting lane i believe is on a bus route as there are 4 bus stops next to the site.
- Every village needs some growth to maintain its shops, schools even the pubs.
- The houses wouldn't be visible from the main road and if done nicely would be a lovely place to live.
- There are footpaths and cycle paths that could join this development enabling you to be safe when walking or cycling.
- Suitable site to build on- adjoins existing housing, you could walk to the bus stops and train station as well as local shops.
- A development that reflects local character would be welcomed.
- Site has sufficient space for local green spaces.

LP_GH/ED/73 - Land north-west of Strawberry Hill, Lypstone - Preferred Allocation

- DCC state a culverted unmapped ordinary watercourse appears to cross centrally through the site and should seek opportunities to daylight and enhance this watercourse.
- A site promoter considers the site to represent a sensible 'rounding off' of the settlement and notes that it is well contained by roads and the settlement boundary. However, they do not consider it to be suitable any employment use (they state that it would be incongruous in this village setting) and question why this is proposed when residents of the proposed housing would have easy access to employment via train in Exmouth and Exeter or via an easy cycle ride to the Woodbury Business Park.
- Lypstone PC - A proportion of residents accepted that some development was inevitable and reluctantly thought it a possible site. (Other concerns as expressed above/below notwithstanding).
- A significant number of objections were received.
- This development, in conjunction with the others, will have a huge and negative impact on the health and wellbeing of Lypstone Parish residents.
- Suggestions in the report of easy access to bus and rail and employment opportunities are unrealistic and presented in a misleading manner. Car use will be the norm for persons to travel to work on already overcrowded roads.
- The current infrastructure struggles to cope and schools, GPs, roads, public transport, flooding, drainage, sewage will be impacted upon. Few, if any, other areas of East

Devon are being impacted upon in such a significant and disproportionate manner. Additionally, the A376 and RD&E hospital are both at capacity.

- The development will have significant negative effects on the environment.
- Farming land will be lost and the coastal preservation area will be built upon and permanently lost – this directly contradicts your policy.
- The green wedge between Lypstone and Exmouth will be seriously eroded; this directly contradicts your policy. It will accelerate the coalescence of settlements, destroying the sense of place and identity for residents.
- The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents.
- Valuable wildlife corridors will be lost.
- Important areas of landscape and visual amenity will be lost forever.
- A small number of supporting comments were received.
- The site appears suitable for development provided an excessive number of properties and access roadways/pathways are not built. The worry being flooding of site and adjacent roads, particularly as there appears to be a natural spring on site.
- The Northern end of the site at Meeting Lane should be the boundary of the built-up area.
- This site is suitable and could be developed sympathetically. Housing should be of a good design i.e cottage style and affordable.
- DEVON BANK along Strawberry Hill must be kept, it is good visual entrance to the village, as well as for wildlife; this is also a natural speed calming measure. Entrance to the development for vehicles should be off Meeting Lane only with a pedestrian access onto Strawberry Hill.
- Site is already next to new houses.
- Natural extension of existing houses. Has a natural spring so water run off etc would have to be carefully mitigated. Not as good as the other site with regards to access and linking up of footpaths and open space.

LP_GH/ED/74 - Land at Strawberry Hill, Lypstone - Rejected Site

- Completely outside the Neighbourhood plan and huge extension to the village boundary. Also unsuitable for housing given its exposed nature and the impact on flooding. Would put significant pressure on already strained local services. Good to see it has been rejected.
- Happy that this site has been rejected for development. It must be protected for the sake of wildlife, the environment, and local residents.
- This should be a green wedge to protect Lypstone Village's identity and is a beautiful gateway to the village. Building on this land would have a detrimental impact to the area.

It is virgin green belt, a wildlife corridor between the River Exe and Pebble bed Heath and has a high landscape sensitivity to new development including the close proximity of St Peter's school and other Grade 11 listed buildings. This land should remain as good agricultural land which is in the Coastal Preservation Area and must remain protected. If this land goes to development along with others along the A376 it will be a continual mass development between Clyst St George and Exmouth which must NOT happen, as village communities will be lost.

- Steep site

LP_GH/ED/75 - Land off Grange Close, Lypstone - Preferred Allocation

- Lypstone PC -
 - This site was the only one from the Public Consultation that received a majority of 52% in favour of development.
 - A proportion of residents accepted that some development was inevitable and reluctantly thought it a possible site. (Other concerns as expressed above/below notwithstanding).
 - The site is for a small number of dwellings which our Neighbourhood Plan and residents prefer.
- Site promoter supports allocation as a sensible 'rounding off' of the settlement.
- This development will have a huge negative impact on the health and wellbeing of Lypstone Parish residents.
- Access to the proposed site is via Grange Close, a small cul-de-sac, with a narrow curved private road at the end. This is entirely unsuitable as an access for construction vehicles.
- The increase in traffic, through the narrow cul-de-sac, would cause significant disruption and risk to safety for the occupants of the existing 12 properties.
- The current infrastructure struggles to cope and schools, GPs, roads, public transport, flooding, drainage, sewage will be negatively impacted upon. Few, if any, other areas of East Devon are being impacted upon in such a significant and disproportionate manner. Additionally, the A376 and RD&E hospital are both at capacity.
- Land will be lost and the Coastal Preservation Area will be built upon and permanently lost – this directly contradicts your policy.
- The development will have significant negative effects on the environment.
- The open character of a green lung will be lost, negatively impacting on the health and wellbeing of residents.
- Valuable wildlife corridors will be lost.
- Unsuitable access for construction phase.
- Suggestions that the site is too small for 6 houses.
- Important areas of landscape and visual amenity will be lost forever.

- A small number of supportive comments.
- It is a natural rounding off of the village boundary and can be developed without significant impact on the surrounding area.
- This proposal is for only 6 houses, which would be OK were this the only current proposal. However, the overall aggregate of proposed new housing in the village is beyond our current capacity.
- Not highly visible, contingent with existing housing. Would need to make sure that density was appropriate and included provision for necessary impact assessment on traffic, infrastructure etc.
- Logical extension of existing houses. Only concern would be more cars entering Longmeadow road and trying to exit at the Sadllers Arms.

LP_Lymp_01 - Little Paddocks, 22 Underhill Crescent, Lympstone - Preferred Allocation

- This will be hugely destructive, in an elevated location that will disproportionately impact on the amenity of the village.
- The only access is on to the Underhill Crescent/Underhill junction which is congested and dangerous with poor visibility due to on-street car parking.
- Lympstone PC -
 - A proportion of residents accepted that some development was inevitable and reluctantly thought it a possible site. (Other concerns as expressed above/below notwithstanding).
 - The site is for a small number of dwellings which our Neighbourhood Plan and residents prefer.
- Likely to generate more on-street car parking in an area where this is already an issue.
- This development will have a huge negative impact on the health and wellbeing of Lympstone Parish residents.
- The current infrastructure struggles to cope and schools, GPs, roads, public transport, flooding and drainage will be negatively impacted upon. Few, if any, other areas of East Devon are being impacted upon in such a significant and disproportionate manner. Additionally, the A376 and RD&E hospital are both at capacity.
- The development will have significant negative effects on the environment.
- Farming land will be lost and the Coastal Preservation Area will be built upon and permanently lost – this directly contradicts your proposed policy.
- The green wedge between Lympstone and Exmouth will be seriously eroded, which directly contradicts your policy. It will accelerate the coalescence of settlements, destroying the sense of place and identity for residents.
- The open character of a green lung will be lost, negatively impacting on the health and wellbeing of residents.

- Valuable wildlife corridors will be lost.
- Important areas of landscape and visual amenity will be lost forever.
- Agent for the landowner - The identified preferred allocation of the Site Lymp_01 (identified in green in the above local plan map extract) is supported.

LP_Lymp_02 - Land lying north of Clay Lane, Lympstone - *Rejected Site*

- I agree this site should be rejected as described.
- In addition the amount of extra traffic through the centre of Lympstone village would have very dangerous safety implications.
- The site is unsustainable, outside the BUAB, it's affects would be drastic on the Wotton Brook flood plain problem.
- Poor access.
- Site floods.

LP_Lymp_03 - Lympstone Nurseries - *Planning Permission Granted*

- It would ruin this area of the village, also it's on a floodplain.

LP_Lymp_04 - Land to the south of Meadowgate Cottage, Church Road, Lympstone - *Rejected Site*

- Green wedge, poor access, on a floodplain
- Additional pressure on very narrow part of road. Inappropriate density of housing.
- Extremely poor access as drive along a footpath. Not suitable for development.
- Very bad access onto a village road, flooding.

LP_Lymp_05 - Land to the south-west of Dawlish Park Terrace, Lympstone - *Rejected Site*

- I strongly agree with rejection of this site.
- Development of this site would create additional unnecessary traffic in already busy country lanes with the increased risk of accidents, particularly to walkers and cyclists.
- Sustainability doubtful.
- This site could suit some development of smaller cottage style properties, it is not remote and some people prefer living on the outskirts of a village. This site if developed

would not impact the landscape, it has good access to the village by road or footpath. This land would not be agricultural land loss.

LP_Lymp_06 - Hollywell Nurseries, Courtlands Lane, Lympstone - *Planning Permission Granted*

- I strongly agree with rejection of this site.
- I believe the information on which this selection was dismissed as a site for allocation is incorrect. A planning application search on the council's website returned no approved applications for this site. However, I agree with the result that this site has been dismissed for allocation for development!
- This is ridiculous- the road access is very poor with only 2 passing places and a right angle bend; no easy access to bus or train so everyone will drive; no space in the school or GP surgery so will all have to travel to Exmouth.
- The site is not appropriate for development:
 - way outside built-up area boundary
 - unsustainable location
 - in open countryside
 - in green wedge
 - not a brown field site
 - it is agricultural land and should be cleared of derelict green houses, which have not been used for growing tomatoes since 1995.
 - very narrow lane for access
 - poor visibility for access

LP_Lymp_11 - Land off Harefield Road, Lympstone - *Rejected Site*

- No comments

LP_Lymp_16 - Land off Underhill Close, Lympstone - *Planning Permission Granted*

- Agents for landowners - While Site Lymp_16 is consented for one large dwelling with annex accommodation, it is considered the site could easily deliver up to 5 – 6 additional units – this figure being considered reasonable in light of the number of units identified as deliverable on the four preferred allocation sites – and therefore the realignment of the Built-up Area Boundary to include Site Lyp-16 is supported. This would allow

additional development to come forward on this site which has been confirmed via appeal as being a suitable location for new development. The progression of the outline and reserved matters applications on the site demonstrates that the site is fully deliverable.

LP_Wood_39 - Rose Cottage, Exmouth Road - *Rejected Site*

- No comments

LP_Wood_43 - Land near Exmouth Road, Nutwell Road, Lypstone - *Rejected Site*

- No comments

LP_Wood_44 - Land at Nutwell Road, Lypstone - *Rejected Site*

- No comments

Omission sites at Lypstone

- None identified.

Woodbury General issues

- The village of Woodbury does not have enough local amenities with only one shop selling limited provisions and infrastructure won't be able to cope.
- More houses taking over green spaces will damage wildlife and push local people out of the village.
- Objection to development at Woodbury given proximity (within 10km) of the designated Exe Estuary.
- Woodbury is already under pressure from traffic travelling through its village to Exeter.
- Woodbury Parish Council (WPC) identify infrastructure issues as a major concern, suggesting traffic calming, 20mph speed limits, and suitable pedestrian routes across the parish.
- National Highways anticipate growth here to be significantly Exeter facing, creating commuter and leisure trips through M5 Junction 30, and future discussions with National Highways is required on transport assessment and potential mitigation.
- The owner of Woodbury Business Park states it is operating successfully and remains consistently full, highlighting a severe undersupply and significant demand for employment land in the area.
- Limited bus service from Woodbury means that new residents will have to drive to work.

LP_Wood_04 - Land off Globe Hill, Woodbury - *Rejected Site*

- Woodbury Parish Council does not support this site and agrees with EDDCs report.
- Object as waste of prime agricultural land.
- Access onto Globe Hill will be dangerous.
- Developing this site will degrade the historic and rural feel of Woodbury.
- This site should join up with 07 and 08 to improve traffic flow onto the main road with potential for a roundabout at the top.

LP_Wood_05 – Land at Venmore Farm, Woodbury - *Rejected Site*

- Woodbury Parish Council does not support this site and agrees with EDDCs report.

LP_Wood_07 - Land off Globe Hill, Woodbury - *Rejected Site*

- Woodbury Parish Council does not support this site and agrees with EDDCs report.

- This site should join up with 04 and 08 to improve traffic flow onto the main road with potential for a roundabout at the top.

LP_Wood_08 - Land to the rear of Orchard House, Globe Hill, Woodbury - Rejected Site

- Woodbury Parish Council supports this site for allocation as it is within walking distance of the village and school, and development would have to provide traffic enhancement.
- WPC state need to justify building on best and most versatile agricultural land.
- The site promoter supports allocation of this site and states that the assessment process was inconsistent and this site performs as well as preferred sites, for example by referring to agricultural land classification on this site but not others which are equivalent grades.
- Access on to Globe Hill will be dangerous.
- Object due to impact on historic village centre.
- This site should join up with 07 and 08 to improve traffic flow onto the main road with potential for a roundabout at the top.

LP_Wood_09 - Land off Globe Hill, Woodbury - Rejected Site

- Woodbury Parish Council supports this site for allocation as it provides an opportunity to enhance the village centre and development would have to provide traffic enhancement.
- WPC state developers would have to overcome heritage and TPO concerns.
- This land currently has very limited amenity value as enclosed by surrounding walls, so support development to help open up this central part of the village.
- Support developing this site as close to existing facilities and could encourage further facilities and benefit the village centre.
- Given there are already houses in between the site and Grade I listed church, this does not seem a relevant factor in considering this site.
- The recent consultation on this site showed a low density, well-designed development retaining important the landscape and heritage aspects of the site.

LP_Wood_10 - Land at Gilbrook, Woodbury - Preferred Allocation

- The Environment Agency advises that there are floodplains and a designated main river along the site edge that should be set aside as green infrastructure, with a buffer of at least 8m from the watercourse, free from built development.

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation.
- Woodbury Parish Council and residents do not support this preferred allocation as it has poor access and connectivity to the village, particularly the distance to the school.
- Woodbury Parish Council due to flooding concerns.
- Woodbury Parish Council due to loss of good agricultural land.
- DCC understand there is a mapped flood risk asset within the allocation that needs to be considered.
- The agent on behalf of the site owners supports the allocation for housing but objects to the requirement for a mixed use scheme to incorporate 0.24ha of employment.
- Support this allocation as logical approach to development.
- Delivery requires pedestrian access across adjoining development and through floodplain, can't provide safe pavement
- Impact on setting of adjacent listed building
- Has not taken account of landscape and elevated views.
- Concern about the impact of additional traffic.

LP_Wood_11 - Land at the rear of Escot Cottages, Broadway, Woodbury - Rejected Site

- Woodbury Parish Council does not support this site as it has poor access, flooding concerns and encroaching into green wedge.

LP_Wood_12 - Land to the east of Higher Venmore Farm, Woodbury - Rejected Site

- Woodbury Parish Council and residents do not support this site and agrees with EDDCs report.
- Bell Cornwell on behalf of landowner urges this site is reconsidered as mixed-use allocation, focussing development in the northern part adjacent to other allocations.
- This site could provide alternative access to Woodbury and green areas.

LP_Wood_13 - Critchards, Woodbury - Rejected Site

- Woodbury Parish Council does not support this site and agrees with EDDCs report.

LP_Wood_14 - Land west of Pound Lane, Woodbury - Rejected Site

- Woodbury Parish Council and residents do not support this site and agrees with EDDCs report.

LP_Wood_15 - Land east of Pounds Lane, Woodbury - Rejected Site

- Woodbury Parish Council and residents do not support this site and agrees with EDDCs report.

LP_Wood_16 - Land of Broadway (Phase 2), Woodbury - Preferred Allocation

- The Environment Agency advises that there are floodplains and a designated main river along the site edge that should be set aside as green infrastructure, with a buffer of at least 8m from the watercourse, free from built development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it is likely to be able to accord with national policy, guidance and legislation. Particularly with regard to the conservation area and listed building setting
- Woodbury Parish Council supports this preferred allocation as it is within walking distance of the village and school, would require pedestrian access to village and traffic calming measures.
- WPC state the perimeter hedge must be maintained and enhanced, and a footpath constructed along the stream corridor.
- DCC state there are known surface water flow routes that abut all of the site boundaries so need to ensure these are managed and not worsened elsewhere within a robust drainage strategy.
- The landowner supports the allocation of this site for housing. It is deliverable as a housing site and is well related to the existing built up area. It is well provided with facilities and there is a strong need for a mix of new housing including affordable housing. The technical work supporting the current planning application demonstrates that the development is deliverable.
- Support this allocation as logical approach to development.
- Would significantly change the landscape and rural character of the village, high impact on AONB due to size and proximity of site.
- Negative impact on CA and listed buildings
- Long distance intervisibility, site can be seen from other side of Exe estuary

- Rural public right of way will be urbanised
- Loss of Grade 2 agricultural land which is currently in use to grow crops.
- Concerned about traffic issues and no safe pedestrian crossing point.
- The road from Broadway to the school is unsafe for pedestrians as it is very narrow with limited footpaths.
- This area could be combined with Wood_10 and Wood_12 to achieve multiple benefits.

LP_Wood_19 – Land on the east side of Parsonage Way, Woodbury - Rejected Site

- Woodbury Parish Council does not support this site as it has poor access.
- Woodbury Parish Council objects due to potential loss of trees.
- Agree with not allocating site for the reasons given.

LP_Wood_20 - Land at Town Lane, Woodbury - Preferred Allocation

- Woodbury Parish Council does not support this preferred allocation as Town Lane has traffic issues, there is a pinch point at the school, and no safe pedestrian access to the village or school.
- DCC state there is an ordinary watercourse that impacts upon this site and opportunities to enhance this should be sought.
- The landowner supports the allocation of this site for housing. It is deliverable as a housing site and is well related to the existing built up area. It is well provided with facilities and there is a strong need for a mix of new housing including affordable housing.
- Town Lane is very narrow to provide access and has no pavement, a traffic survey shows it is busy and cars exceed speed limit.
- AONB and intervisibility should be addressed in the assessment.
- Construction noise, dust will be unacceptable for nearby existing residents.
- Concerned that surface water run-off from development will lead to flooding in Town Lane and elsewhere in the settlement.
- There are a number of large trees that provide habitat for a rookery which will be negatively impacted by development.
- Local people rent this field to graze horses, sheep etc so oppose developing this site.

LP_Wood_21 - Land at Knoll Cottage, Woodbury - Planning Permission Granted

- No issues raised.

LP_Wood_23 - Ford Farm, Woodbury - Potential 'Second Best' Allocation

- Woodbury Parish Council does not support this second-choice allocation as Town Lane has traffic issues, there is a pinch point at the school, and no safe pedestrian access to the village or school.
- DCC state there is an ordinary watercourse that impacts upon this site and opportunities to enhance this should be sought.
- Rural facing site, close to AONB
- Poor relationship to village, facilities are a 10 minute walk and no pavement can be provided.
- Object due to impact on wildlife, including rodents, snakes, birds, pond.
- There is no mains sewage on the current Ford Farm site, so additional development likely to cause sewage and drainage issues.
- Object due to poor access onto the main road.
- 18 houses on this site is too high density and out of keeping with surrounding area.
- See the objections in the planning application 21/0299/OUT refusal in 2021 – nothing has changed since then.
- Development will cause surface water run-off, leading to flooding along Broadway (B3179).

LP_Wood_24 - Land north-east of Webbers' Meadow, Castle Lane, Woodbury - Rejected Site

- Woodbury Parish Council does not support this site as it has poor access to facilities and is remote from the village. Castle Lane would require widening and hedgerows would be lost.
- Site promoter objects to non-allocation of the site, which is considered to represent a sensible approach to infilling. The site assessment exercise conducted by EDDC was flawed in relation to highway considerations and landscape impacts could be mitigated by limiting development to up to 70% of the site adjacent to Webbers Meadow.

LP_Wood_33 - The Top Yard, land at Venmore Farm, Woodbury - Rejected Site

- Woodbury Parish Council does not support this site for allocation and agrees with EDDCs report.
- Bell Cornwell on behalf of landowner recommend this site is allocated, with several benefits such as previously developed land, close to facilities, small site.
- Developing this site will improve the visual impact as you enter the village and provide important homes.
- This site could be developed alongside Wood_12, turning the difficult bend into a roundabout which would improve safety and pedestrian access.

LP_Wood_37 - Cricket field of Town Lane, Woodbury - Rejected Site

- Woodbury Parish Council and residents do not support this site as it is an important and well-used amenity area including the community orchard, cricket field, and dog walk.
- Object to this site because of adverse landscape impact.
- Do not support this site because of poor pedestrian access along Town Lane.

LP_Wood_42 - Webbers Farm, Castle Lane, Woodbury - Rejected Site

- Woodbury Parish Council and residents do not support this site as it is an important amenity and would result in a loss of important holiday provision which would be detrimental to local tourism and businesses.
- WPC object as this site is remote with no pedestrian access to the village.
- Omission sites
- Bell Cornwell submits an employment site on behalf of the landowner to be allocated to the west of Woodbury Business Park, to extend this successful, established employment site.
- Landowner suggests field to the west of Wood_10 as available for development, as it has low ecological value and could improve walking/cycling safety by avoiding the right-angled Down Corner.

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



PDF 5 of 10

Chapter 6 (Part C) – Strategy
for development at Service
Villages / Other Sites

Pages 248-324

July 2023

Policy 26 - Development at service villages

General issues (not relating to specific settlements)

- Devon County Council note that some Service Villages do not have their own primary school or potential safe walking routes (such as Dunkeswell and Exton) and are therefore potentially an unsustainable location, need to provide additional home to school transport.
- Development at Service Villages should be modest to meet local needs only.
- Do not add second choice sites as these are unsuitable and not well related to the availability of jobs, services and infrastructure.
- Concerns that Smaller villages risk being abandoned if you don't provide some infill development which will attract more services in rural areas.
- Additional development in villages around Ottery will put even more pressure on infrastructure (schools, roads, doctors) in the town which cannot cope.
- Proposals seem proportionate to the villages.
- The East Devon AONB team state that settlements where allocations are proposed within the East Devon AONB should be subject to further assessment (either as LVIA or landscape appraisal) to assess the effect the proposals would have on the AONB. This relates to sites identified at Broadhembury, Chardstock, Dunkeswell (NB within the Blackdown Hills AONB), Kilmington, Musbury, Newton Poppleford, Otterton, Sidbury and Tipton St John. Policy 26 should be expanded to require that in those settlements additional assessments should be undertaken (using LVIA or landscape appraisals) to consider the effects of the proposals on the AONB.
- National Highways anticipate the strategic road network can accommodate the level of growth proposed at other Main Centres, Local Centres and Service Villages, but expect a high-level transport assessment for the entire Local Plan to provide evidence.

Beer - General issues

- The Environment Agency welcome the designation of a coastal change management area.
- Several comments that Beer, along with other villages with similar level of population, facilities & services should/could support more development and not just to meet very local need, to support them to grow and thrive and serve surrounding areas and that Beer is more suitable for development due to level of amenities than some other villages in Tier 4.
- One respondent expressed surprise that no development is proposed at Beer in the draft plan and considers there are suitable sites but will need high quality design. Another welcomed no development being proposed at Beer.
- One comment suggesting Beer could be one location for increasing availability of Park & Ride facilities to further sustainable transport objectives.

LP_Beer_01 - Land at South Down Farm, Common, Hill, Beer - *Rejected Site*

- No comments made specific to this rejected site.

Omission sites at Beer

- Landowner representation putting forward land at Quarry Lane, close to the Beer Community Land Trust development at Little Hemphay, for inclusion in the Local Plan for employment, residential or recreational development, with suggested potential for this to include additional car parking to serve the CLT site.

Branscombe - General issues

- The Environment Agency welcome the designation of a coastal change management area.
- Very limited comments specific to Branscombe - one respondent expressed surprise that no development is proposed at Branscombe in the draft plan and considers there are suitable sites but will need high quality design. Another supported no development at Branscombe.

LP_Bran_01 - Land to the west of Cott Mead, Branscombe - *Rejected Site*

- No comments made specific to this rejected site.

LP_Bran_02 – Land at Cotte Barton Farm, Branscombe - *Rejected Site*

- One comment in support of development for affordable housing needed because the village is 'dying out' and young people are being forced out due to second homes and the costs of housing. No other comments and sentiments expressed specific to this rejected site.

LP_Bran_03 - Land at Deems, Branscombe - *Rejected Site*

- No sentiment expressed or comments made specific to this rejected site.

Omission sites at Branscombe

- None identified.

Broadhembury - General issues

- Generally respondents strongly objected to any new development at Broadhembury unless it was purely to provide affordable housing to meet local needs (and this was strongly supported). Many respondents felt that a settlement boundary was not justified and that this would preclude affordable housing which the community was already trying to provide.
- The Parish Council did not support the designation of site LP_Brhe_09 nor the new development boundary which includes it. Among other reasons, this would be inconsistent with policy and the NPPF (if it is interpreted in a way which recognises the dispersed nature of ED communities), doesn't comply with the LP objectives.
- The PC support the concept of 'service villages' but consider that some development should be allowed in the hamlets elsewhere in the parish in order to support the services, including affordable housing. They consider the hamlets to be a reasonable walking/cycling distance, accessible by electric vehicles and that the school serves this 'sustainable' hinterland.
- Overall, respondents were concerned that additional development would detract from the special historic character of the village, would impact upon heritage and natural assets and would exceed the capacity of local roads and infrastructure (especially the sewage pumpin station which is over capacity).

LP_Brhe_04 - Causeway End, Broadhembury - *Rejected Site*

- No comments were made

LP_Brhe_05 - The Old Orchard, Broadhembury - *Rejected Site*

- No comments were made but several 'sentiment' emojis indicated that respondents would be unhappy with development on the site.

LP_Brhe_07 - Land south of The Vicarage, Broadhembury - *Rejected Site*

- No comments were made but several 'sentiment' emojis indicated that respondents would be unhappy with development on the site.

LP_Brhe_09 - Land opposite Broadhembury Memorial Hall - *Potential 'Second Best' Allocation*

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly regarding Grade I LB.
- Devon County Council state that site design should consider any opportunities to enhance the existing watercourse running along the north east boundary, and the ordinary watercourse that crosses the site access.
- Site is not widely supported by the community
- Would support if development was only for affordable housing
- This is the least worst option, close to facilities and village hall, well screened, utilities are nearby
- May set a precedent
- Will block/detract from views of St Andrew's Church
- Unlikely that affordable housing will be provided by landowner
- Need to ensure that housing is affordable to local people
- Won't create an attractive gateway to the village, the approach lane is special in it's own right
- Object to settlement boundary as this will act against community desire to provide affordable housing
- Object to the introduction of a settlement boundary- not justified and doesn't take account of the whole village being a heritage asset
- Road access is dangerous
- Lighting will detract from dark skies
- May need third party landowner involvement to achieve access
- Detrimental to the setting of the village
- Residential garden paraphernalia and domestic outbuildings will detract from rural character
- Field is high biodiversity/ecology value
- Field already results in water run off and flooding
- Houses in Honiton and Cullompton are sufficient to meet need
- Broadhembury lacks infrastructure needed for new houses (and doesn't want it eg street lighting, pavements, signs)
- Oil central heating (no mains gas) will not be environmentally friendly
- Lack of capacity at local school
- Lack of sewage capacity- regularly overflows
- Any new development will detract from historic character of village
- The emerging Government guidance removes the requirement for a minimum amount of housing to be provided in the village

- The potential site boundary is arbitrary and doesn't follow natural features

Omission sites at Broadhembury

- LP_Brhe_02 at Dulford was submitted for 61 houses and was excluded from further consideration as Dulford is not a tier 1-4 settlement and so it did not meet the methodology for consideration for allocation. The owner advises that the site could alternatively be suitable for Gypsy/Traveller pitches should there be a need.

Chardstock - General issues

- The Environment Agency note that the village is in the catchment of the River Axe and that development will need to be nutrient neutral.
- The facilities available in Chardstock have been incorrectly assessed - there is no bus service or pub. The local post office sells that bare essentials only.
- The housing allocation for Chardstock would involve building on a green field site which is not climate change friendly or acknowledge the climate emergency.
- The existing village infrastructure struggles to support the present population and vehicle movements – adding another 30 houses will just add to the problem and increase pollution as there is no available public transport.
- Contrary to Neighbourhood Plan (NP) which only identified two affordable homes. Changes must reflect the NP.
- New housing is not likely to be affordable in the honest meaning of the word.
- Concerning proposed development Chardstock we live off the road into Chardstock at Honeyhill Farm our entrance comes onto the road into the village, between the times of 8.30am to 9.30 am and from 2.45 to 3.30 pm we find it impossible to get out of our lane and out to the main A358 due to the single lane road way, having put up with it for 39 years, we resolved not to go out at these times. On the occasion when we have had Ambulances and other emergency services trying to get to us, and our fellow neighbours, all have experienced life-threatening delays because of the difficulty getting through the lane. We are not opposed to the development subject to widening the narrowest parts of the lane.
- There is an undeniable need for housing especially for East Devon residents when looking for their own homes where they work.
- Would it be possible for as well as making properties affordable there could also be a Covenant to protect them from purchase from outside the area?
- Residents concerned over impact on road safety suggest that the secure infrastructure necessary for any future development must be reviewed and undertaken before any development is planned.
- It is appalling to consider ruining the peace and tranquillity of this beautiful rural village.
- The lives of the mainly older population would be devastated by such disruption to their daily lives by extensive long term building works, not to mention the increase in traffic which would be unsustainable.
- Consideration should also be given to local wildlife which would be destroyed by the removal of fields and hedgerow which form their habitat.

LP_Char_01 - Green Lane Farm, Chardstock - Rejected Site

- No comments

LP_Char_03 - Chubbs Yard, Chardstock - *Rejected Site*

- No comments

LP_Char_04a - Land off Green Land, Chardstock - *Preferred Allocation*

- Developer (Strongvox Ltd) supports the allocation of Char_04 as sustainable and suitable for development – commissioned landscape and design work show that 40 dwellings can be delivered.
- Developer (Strongvox Ltd) objects to employment land on this site as this will mean larger buildings that cannot respond as well to the landscape context and will reduce housing delivery.
- This site is within comfortable 20-minute walking distance of a primary school, community hall, convenience store, place of worship, pub, playing fields and bus stop.
- Access to the village is difficult, by narrow lanes with few passing places. This is particularly so at the start and end of the school day, when parents drive children to/from the school. There is no public transport to/through the village. Nearest is at A358 along a narrow lane with no footpath. Also, there is a lack of amenities within the village, eg pub is permanently closed and the situation of the local shop is precarious.
- I do not feel Chardstock can sustain any further housing developments due to all access roads to the village are single track, already very busy and dangerous to walk along.
- The river Kit is already failing due partly to sewage leaks.
- The bus service for the village runs along the A358 which is a mile from the centre of the village and not safe to walk along.
- Our pub is closed with little hope of it opening soon.
- There is talk about our church become a festival church. Even a housing development could not increase the numbers enough to change attendance figures enough to save this from happening.
- Our village shop is struggling to survive after a community buy out.
- Multiple comments expressed inadequacy of road network to cope with construction phase and development.

LP_Char_04b - Land off Green Land, Chardstock - *Rejected Site*

- Developer (Strongvox Ltd) supports the allocation of Char_04 as sustainable and suitable for development – commissioned landscape and design work show that 40 dwellings can be delivered.
- Developer (Strongvox Ltd) objects to employment land on this site as this will mean larger buildings that cannot respond as well to the landscape context and will reduce housing delivery.
- This site is within comfortable 20-minute walking distance of a primary school, community hall, convenience store, place of worship, pub, playing fields and bus stop.

Omission sites at Chardstock

- None identified

Clyst St Mary - General issues

- Need clarity on how the proposed allocations can support delivery of the Clyst Valley Trail.
- Clyst St Mary has seen much development recently without a corresponding increase in facilities.
- National Highways anticipate growth here to be significantly Exeter facing, creating commuter and leisure trips through M5 Junction 30, and future discussions with National Highways is required on transport assessment and potential mitigation.

LP_Clima_01 - Land off Clyst Valley Road, Clyst St Mary - *Planning Permission Granted*

- No comments

LP_Clima_02 - Land at Winslade Park, Clyst St Mary - *Planning Permission Granted*

- This absorbs greenfield and plantation land. We should first develop brownfield land before moving on to essential land required to bring about sustainable food and promoting biodiversity in the region.

LP_Clima_03 - Homefield, Oil Mill Lane, Clyst St Mary - *Rejected Site*

- No comments

LP_GH/ED/53 - Land to the north of the A3052 between The Cat & Fiddle and Devon County Showground, Sidmouth Road, Clyst St Mary - *Rejected Site*

- No comments

LP_GH/ED/55 - Land to the north of the A3052 between The Cat & Fiddle and Devon County Showground, Sidmouth Road, Clyst St Mary - *Rejected Site*

- No comments

LP_GH/ED/56 - Land at Coxes Farm, Sidmouth Road, Clyst St Mary - *Rejected Site*

- No comments

LP_Sowt_01 - Land at Bishops Court Lane, Clyst St Mary - *Rejected Site*

- No comments

LP_Sowt_02 Land south of Bishops Court Lane, Clyst St Mary -*Rejected Site*

- No comments

LP_Sowt_03 - Land north of Sidmouth Road, Clyst St Mary - *Preferred Allocation*

- Agents for Core Strategic Land Limited (CSL) -
 - Fully support the Map extract for Clyst St Mary and in particular the inclusion of the site at Sidmouth Road in Clyst St Mary (Site Sowt_03) as a preferred allocation. This site and the general location is seen as suitable for new housing development.
 - The impact of developing this site would be minimal as it is already bounded on two sides by existing development, housing to the immediate west and The Show Ground to the immediate east. The existing boundary to the immediate east of the site, namely the Show Ground, prevents unfettered urban sprawl, therefore this is not an issue with development of this site.
 - This site is very suitable for housing, being a logical extension of the village, surrounded on two sides by existing development to the immediate south and west and up to a clearly defined and defensible boundary in the form of The Show Ground to the east. Therefore,

this sensible extension to Clyst St Mary at Site Sowl_O3 does not represent ribbon development but sensible rounding off.

LP_Sowl_04 - Land at junction of Sidmouth Road and Oil Mill Lane, Clyst St Mary - *Rejected Site*

- No comments

LP_Sowl_05 - Land at junction of Sidmouth Road and Oil Mill Lane, Clyst St Mary - *Rejected Site*

- No comments

LP_Sowl_06 - Langdon's Business Park and occupied units - *Rejected Site*

- No comments

LP_Sowl_07 - Denbowe, Clyst St Mary - *Rejected Site*

- No comments

LP_Sowl_09 - Bishops Court Lane, Clyst St Mary - *Preferred Allocation*

- 3West Developments Ltd supports the identification of Clyst St Mary as a Tier 4 settlement and the allocation of 35 dwellings. However, the company objects to the requirement for 0.14ha of employment land, which is unjustified and poorly evidenced. The site is in one ownership and can be delivered quickly.

LP_Sowl_11a - Land at Bishops Court Lane, Clyst St Mary - *Potential 'Second Best' Allocation*

- Savills Planning on behalf of the landowner of SOWL_11a site, suggested that SOWL_11a is a "Second Choice" site but can be combined with SOWL 03 to deliver a range of potential benefits, such as accommodate the Clyst Valley Trail through both sites and the opportunity to consider a road link from the Sidmouth Road through both

sites. Combining the two sites can bring forward and deliver a number of infrastructure and other public benefits which are of wider significance and can only be achieved by combining these two sites.

LP_Sowt_11b - Land at Bishops Court Lane, Clyst St Mary - *Rejected Site*

- No comments

Omission sites at Clyst St Mary

- 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).

Dunkeswell - General issues

- Dunkeswell Parish Council - It is the opinion of the Council that Dunkeswell does not need any more larger development sites as is proposed in the Draft Local Plan. Dunkeswell has had what it considers, reasonable growth since the last Local Plan review, this includes the Pump Fields properties and also the 9 properties at Land North of Louis Way (below MUGA/Allotments). Rather they would wish to see "organic" growth of individual properties, as and where required, in keeping with this rural area.
- The Sewerage System - The system is old with small pipework and is easily overwhelmed in places currently, adding more homes would only add to this issue.
- Dunkeswell does have Charity run Pre-School, but does not have Primary or Secondary School and if it did, the likelihood could be that other smaller schools in the local area (ie Broadhembury/Upottery) may close, in addition there would transport to and from school to consider and would this fit well with green targets?
- Bus Services - Services have been cut in recent years and as far as we are aware there are no plans to improve service levels in Dunkeswell. Currently there is a Mon – Sat service and no service on Sunday. There is no direct or timetabled bus service to serve those working at the industrial estate.
- Employment - Residents of Dunkeswell do not necessarily work on the industrial estate, and it is the opinion of the Council that the majority of residents actually work elsewhere, travelling by car to other towns, with people, not resident in Dunkeswell travelling here (mainly by car) to work.
- Other Services - Other local services could be unable to offer or cope with a large increase in resident numbers.
- The Council has noted that in some local areas, housing has been identified by Parish Councils and Residents as being required/appropriate (ie Upottery) and yet this has been declined. Is it not better to have housing where it required and wanted? Lessening the burden in other areas where it is not wanted or required?
- Could the mobile homes already in place at Dunkeswell at Hornbeam Park be considered instead of building a new development? Could the Holiday Lodges be granted residential status to allow people to downsize thus providing homes in established areas to become available for those wanting to upsize their home.

LP_Dunk_01 - Land at Hutshayes Farm, Dunkeswell - Rejected Site

- The site was considered to be acceptable and appropriate in the first round working draft local plan in which it was allocated for approximately 53 homes. The Council are requested to reconsider their conclusion to not allocate the site and reallocate the site for housing development of approximately 53 homes.

- The land is on a slope and has a high elevation above Abbey Road, this is not ideal for getting in and out of the site. One side has quite a sheer drop and there have been small landslides previously. The infrastructure of Dunkeswell will not cope with more houses as it does not cope with the ones we currently have.

LP_Dunk_02 - Land east of Manleys Farm, Dunkeswell - Rejected Site

- The Parish Council refute suggestions that the site proposed by EDDC for 43 new homes and 0.17 hectare of employment on land at Brookfield's, Dunkeswell (old Football Field), is a sustainable location with good transport links on the following grounds:
 - Roads and Transport - To access Dunkeswell from the Honiton or Hemyock/Wellington direction is by using lanes, that currently are not adequate. Maintenance on these roads is sporadic at best and regularly potholes and road surfaces are eroded into the road surfaces causing dangerous driving conditions, narrow lanes and large freight cause issues and also flooding creates issues in heavy rainfall with run off water on the hills collecting at the bottom of the hills.
 - Pavements - Pavements are patchy or non-existent in places, along the main road through Dunkeswell, towards the airfield continuing like this until well into the Old Village. This lack of pavements combined with the high traffic flows (including heavy goods vehicles) at certain times of the day do not make walking/cycling a safe experience. In response to village requests the Parish Council has been working with the Police to establish a Speed Watch group. Police guidance for Health and Safety, since lockdown, has been amended recently resulting in every proposed SpeedWatch site being rejected, as the Police say they fail to offer protected safe areas for volunteers or Police Officers.
 - Interactive roadside speed signs have been investigated and Highways have rejected these saying there is no place suitable as the main through road does not allow enough forward vision for the signs to be sited safely.
- Trees - many trees in Dunkeswell are TPO'd, at Jenwood Road (backing onto the proposed preferred site), trees are TPO'd and already cause owners and DPC enormous problems, with residents not being allowed to remove and replace them and the constant concerns of trees falling in high winds and shading properties.
- The land is on a slope and has a high elevation about the main road, this is not ideal for houses. The infrastructure of Dunkeswell will not cope with more houses as it does not cope with the ones we currently have.

LP_Dunk_04 - Land north of Louis Way, Dunkeswell - Rejected Site

- No comments

LP_Dunk_05 – Broomfields, Dunkeswell - Preferred Allocation

- The above issues (Dunk_02) would be doubled by building on the Broomfield site on the Highfield Estate side and exacerbate an already existing issue.
- Access to the proposed development - The Council agree unanimously that the access to Broomfield's is very narrow and probably doesn't currently meet the standards.

Omission sites at Dunkeswell

- None identified

East Budleigh - General issues

- None identified

LP_Ebud_01 - Land off Frogmore Road, East Budleigh - *Rejected Site*

- Agree with EDDC site assessment – outside boundary so unacceptable.
- Unacceptable access.

LP_Ebud_02 - Ashfield, Vicarage Road - *New Site - not assessed*

- Respondents were concerned that development would harm the listed building and its setting.
- Outside boundary and marked as green space in neighbourhood plan and should remain as such.
- Access problems and no safe footway to village.

LP_Ebud_03 - Land on the south side of Russell Drive - *New Site - not assessed*

- Would prefer this site to Ebud_02.
- A couple of respondents felt that the site should be excluded from settlement boundary due to highway safety issues.
- Grade 1 agricultural land.
- Planning permission has been refused in the past.
- Could only be developed if home on Russell Drive demolished.

Omission sites at East Budleigh

- None identified

Exton - General issues

- Proposed sites will impinge on the Green Wedge and adversely affect the rural landscape.
- Proposals are contrary to the Neighbourhood Plan.
- Sites will add to traffic on the already congested A376, particularly alongside other sites at Exmouth and Lympstone, with no suggested mitigation.
- National Highways anticipate growth here to be significantly Exeter facing, creating commuter and leisure trips through M5 Junction 30, and future discussions with National Highways is required on transport assessment and potential mitigation.
- Exton is not sustainable as it has few services, facilities and jobs compared to Ebford/Clyst St George.

LP_Wood_01 - Field 4583, Exmouth Road, Exton - Preferred Allocation

- Woodbury Parish Council support this preferred allocation.

LP_Wood_27 - Marandor, Exmouth Road, Exton - Rejected Site

- No comments

LP_Wood_28 - Land to the north and east of Exton Farm, Exton - Preferred Allocation

- The Environment Agency advises that the southern boundary fringes the Woodbury Brook main river and state that this area should be set aside for green infrastructure with a buffer of at least 8m from the watercourse, free from built development. There has been previous flooding on record. Development may, therefore, provide an opportunity for floodplain improvements to reduce flood risk to the community downstream.
- Devon County Council note there is a long history of flooding on the adjacent Exmouth Road and downstream Station Road, as well as along Mill Lane and the southern boundary of the site – therefore a robust drainage strategy that seeks improvements should be considered.
- Woodbury Parish Council support this site only if the critical flooding issues on Mill Lane are addressed prior to development occurring.

- The landowner supports the allocation of this site for housing. It will help support the vitality of the settlement and provide a source of rural housing for local residents, including affordable, and diversify supply.
- Flooding will make this site inaccessible.
- Developing this site will lead to sewage outfall.

LP_Wood_41 - Land adjacent to the A376, Feniton - *Rejected Site*

- Woodbury Parish Council do not support this site - it is an important Green Wedge and is in the Coastal Protection Area.
- Agree that this site is too prominent, it is Green Wedge and development would adversely affect the character of the village.
- Agricultural land comments are correct but the same can be said about many sites in the area.
- Good transport links.
- Object to developing this site as it is a wildlife corridor.
- Local infrastructure cannot cope.

Omission sites at Exton

- None identified

Feniton - General issues

- The following question was asked in the consultation - What level of additional housing development do you feel is appropriate for Feniton for the period from 2022 to 2040? The responses recorded were:

	Responses	% of respondents
Zero	9	25%
Between 1 and 50 new homes	17	47%
Between 51 and 100 new homes	3	8%
Between 101 and 250 new homes	3	8%
Between 251 and 500 new homes	2	6%
501 or more new homes	2	6%
Total	36	100%

- Devon County Council (DCC) note all allocations are within the Feniton Critical Drainage Area, which means this catchment needs to be protected from development pressures.
- DCC state the SUDS hierarchy should be applied, all off-site surface water discharges from development should mimic “greenfield” performance – see CIRIA SUDS manual and LLFA guidance.
- A petition was received, objecting to the inclusion of all/any of the amber second choice sites due to a lack of facilities and infrastructure, additional car journeys on inadequate country lanes, exacerbation of existing flooding, issues of inconvenience and safety with the level crossing and loss of open countryside, agricultural land and wildlife habitat. Brownfield sites should be developed. Agree that the red ‘rejected’ sites should not be developed. Support 42 houses on the preferred site at the former Burlands Mead nursesey.
- There was more general public concern around flooding issues and the ability of the village to accommodate extra development without worsening flooding matters (recent and planned flood alleviation measures were cited as inadequate).
- Concern was raised that the train service is poor and many residents are car dependent with few actually using the train. Though it was suggested that roads to the village are poor.
- Concern was raised that there are limited employment opportunities at the village.
- Reasons for favouring development at Feniton included – the presence of a primary school, village hall, shop, recreation facilities, and proximity to Exeter.
- The capacity of facilities to accommodate growth was challenged and it was highlighted that the facilities that do exist are limited in number.

- A respondent advised that the allocation of a single site in Feniton risks housing delivery as it may have a lower yield or not come forward at all.
- Payhembury PC – Concerns over the scale of proposed development at Feniton including; impact on already stretched local infrastructure including facilities (school places, doctors, etc); impact of increased traffic on local, often narrow, roads; pedestrian and cyclist safety.
- Concern was raised that large scale development would completely change the character of the village.
- A number of respondents referred to the past ‘super Inquiry’ from 2014 where and Inspector rejected to larger scale development proposals, but accepted a smaller one.
- It was highlighted that the plan strategy places Feniton in Tier 4 where only modest development is proposed.
- Numerous respondents commented that the roads are unsuitable for additional traffic, especially the single track lanes around the village
- A lack of infrastructure was a common concern, with difficulty accessing dr’s, dentists, healthcare and with sewage capacity
- Railway crossing is the only crossing on a crossroads in England, and barriers are controlled in Basingstoke. Traffic congestion onto Ottery Road is already severe at times and additional traffic will worsen the danger
- Flood alleviation scheme was calculated based on existing houses, it won’t have capacity for the allocations (especially as some allocations develop land needed for alleviation)
- Insufficient sewage capacity for any extra houses

Many of the above matters were raised in respect of potential individual site option choices (below) and are not repeated again in the individual site assessments, unless a specific site relevant factor is highlighted.

There were, however, also (limited) representations in favour of development at Feniton:

- Agents for Bloor Homes advised: Feniton represents an unconstrained area. Indeed, it is strategically well placed with few environmental constraints, located outside the Area of Outstanding Natural Beauty [AONB] and Coastal Preservation Area with relatively strong sustainability credentials including the railway station and a reasonable provision of facilities and services including primary school, shops, pub:
- A respondent commented that Feniton is sustainable, with a range of facilities and good public transport, more housing sites should be identified

LP_Feni_01 - Land at Feniton forming park of Sherwood Farm - *Potential 'Second Best' Allocation*

Objection to site Feni_01 as a development choice were raised on the grounds of:

- being agricultural land;
- relevance to flood prevention;
- Site and adjacent lane are prone to flooding;
- wildlife interest;
- Being outside of the existing Built-up Area Boundary for the village;
- Would merge Feniton into the hamlet of Colesworthy

Issues in favour of the site included:

- The right side of the level crossing to get to the A30 highway.

LP_Feni_03 - Land at Long Park Farm, Feniton - *Rejected Site*

Objection to site Feni_03 as a development choice were raised on the grounds of:

- Loss of agricultural land;
- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.

LP_Feni_04 - Land off Ottery Road, Feniton - *Rejected Site*

Objection to site Feni_04 as a development choice were raised on the grounds of:

- Highway access to the site is poor and adjacent road is congested at key points in time and there are narrow points and congestion at the rail crossing;
- Lack of pedestrian access alongside the site;
- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.

Issues in favour of the site included:

- A respondent advised: The only advantage of this site is that of all the sites in Feniton it is closest to the A30 where most traffic will inevitably head.
- Agents for Bloor Homes advised that:
 - Strategic Policy 26 is appropriate in terms of proposing growth at Feniton;
 - the proposed site allocation at Feniton for 42 homes would be insufficient to meet development needs for the village for the plan period;
 - The site is well located to accommodate development with low levels of constraint/sensitivity;
 - The site has good public transport connections;
 - There are lower levels of landscape sensitivity at the site;
 - The site will aid delivery of new market and affordable housing
 - The site will help delivering local flood mitigation -
 - The site will provide publicly accessible open spaces
 - The Site will be designed to achieve a biodiversity net gain.
- Agents for Bloor Homes (advise they) have submitted a Mineral Resource Assessment [MRA] (prepared by Wardell Armstrong, dated September 2022) to the Council following the Call for Sites consultation. The report concludes that due to the small quantity of the safeguarded mineral on this site, it is highly unlikely that the mineral would ever be suitable for, or subject to, commercial extraction either now or in the future. In addition, the proposed development will not prejudice the future working of the safeguarded mineral resource to the southwest of the site. The site therefore meets the requirements of adopted mineral safeguarding policy “Policy M2: Mineral Safeguarding Areas”. They object to the Council’s conclusions that Site meets the definition of ‘unachievable’.

LP_Feni_05 - Land and buildings at Burland Mead, Feniton - Preferred Allocation

This site is proposed as an allocation and received more comments in favour of development than other site options in the village.

Objection to site Feni_04 as a development choice were raised on the grounds of:

- Existing problems of foul and surface water drainage may be worsened by development of this site;
- The removal of any trees from this sight will impact on the carbon footprint of the village and ha a detrimental effect on wild life that have had 30 years to make this their home. Maybe some endangered species live here
- Question whether this site is capable of accommodating 42 dwellings given the site size and nearby constraints.

Issues in favour of the site included:

- A respondent advises: Most suitable site for development to satisfy the housing requirements of the village. Ideal, central location with good access. Unused (brownfield) site.
- Development of this site could offer opportunities to improve this part of the village the sites has lain derelict for some time.
- It was suggested: A new over 55's development would be great and might encourage older residents to move and free up family housing stock in the village.
- This site is closer to the A30 so the impact on the village of additional traffic and extra car journeys could be somewhat less than other sites.
- The site is seen to fit within village boundaries and make use of vacant land.

LP_Feni_06 - FPFA Club, Station Road, Feniton - Rejected Site

Objection to site Feni_06 as a development choice were raised on the grounds of:

- Loss of sports grounds and community facilities in the village with no other better locations for such provision

LP_Feni_07 - Lyndale, Feniton - Potential 'Second Best' Allocation

Objection to site Feni_07 as a development choice were raised on the grounds of:

- DCC state there appears to be significant flowpaths running through or adjacent to this site which cause flooding to property in Feniton, so consider opportunities to reduce peak runoff.
- EDDC appear to have forgotten that planning permission was granted some years ago to site the attenuation pond in this field, being part of phase4 of the very important and long overdue Feniton Flood alleviation scheme.
- Traffic from this site would exit the village from north of the railway line. It is also some distance away from access to the A30. Traffic already backs up through the village and to the north when the level crossing barriers are down.
- Increased risk of flash flooding in Station Road, as concreting over this area will reduce the ability of the ground to absorb run off from the higher ground behind.
- Access onto the thin lane, which is already difficult and dangerous for pedestrians, cyclists and cars, would be awkward and would increase traffic near the primary school which is already very busy.

Issues in favour of the site included:

- The natural & logical choice if a Second Best site has to be developed, as it would partially blend Old Feniton village with new Feniton. Level site with reasonable, safe access.

LP_Feni_08 - Land south-east of Beechwood - *Potential 'Second Best' Allocation*

Objection to site Feni_08 as a development choice were raised on the grounds of:

- Too close to Old Feniton to the point where old and new Feniton will almost join and will spoil the picturesque land surrounding old Feniton;
- This site is impractical for access by vehicles approaching from the old village from Green Lane or heading towards the old village. Developing the site will cause substantial and constant traffic bottle necks along this part of Green Lane.
- It was a site rejected at the Feniton super appeal.

Issues in favour of the site included:

- Agent submits this land plus land to the south in support of response that Feniton should have a greater level of development – entire site could accommodate around 95 dwellings.
- This site is within comfortable 20-minute walking distance of public transport including bus stops and the train station providing connections to Exeter and beyond.
- The bulk of this site lies outside the built up area boundary for Feniton; however a small section lies within it. Small scale development on this small section only may be achievable.

And Greenslade Taylor Hunt as agents for the prospective developer advise:

- The plan is not consistent with national policy in respect of not allowing villages to thrive and grow (cross references to Policy 1);
- All sustainable settlements should help deliver housing growth (this cross references to Policy 2).
- Allocation for housing at Feniton and settlements under Policy 2 does not reflect local needs. There should be an overarching methodology used and applied to establish need, or a set figure for housing growth should be established.

- The site lies outside of protected landscapes;
- There are no nearby wildlife designated assets;
- The land does not present any obvious physical or planning constraints that would limit its development.
- Land falls in full within Flood Zone 1, the lowest category of risk from flooding. There is ample space on site to attenuate surface water on site 14 | Page and connect into the upgraded systems to provide a betterment.
- There is no evidence of contamination;
- A range of housing types could be accommodated;
- Development would be viable.

LP_Feni_09 & 11 and LP_GH/ED/38 - Land at Sherwood Cross - 09 & 11 - Potential 'Second Best' Allocation / GH/ED/38 - Rejected Site

Objection to sites Feni_09&11 and LP_GH/ED/38 as a development choice were raised on the grounds of:

- DCC state there appears to be significant flowpaths running through or adjacent to this site which cause flooding to property in Feniton, so consider opportunities to reduce peak runoff.
- The road bisecting 09 and 11 is a narrow country road which already struggles to properly support existing traffic levels, let alone the additional traffic development here would bring.
- The site contains a ridge to the north which would make housing more visible.
- Colestocks Road, from which access to the site(s) would be gained, runs north/ south from Feniton to Colestocks. There are numerous pinch points along this road which do not allow two cars to pass.
- Traffic congestion would also increase travelling south from these sites, causing more stationary traffic back up from the level crossing.
- The field on which site Feni 11 is proposed currently absorbs significant amounts of runoff water from Charlton Hill and Cheriton Hill. Development would exacerbate flooding problems.
- The roads around this site flood from surface runoff.
- These sites are all north of the railway line. They are also the furthest away from the A30. Traffic already backs up through the village and to the north when the level crossing barriers are down.
- Development could result in demolition of a listed building.
- The loss of open countryside, productive agricultural land and wild life habitat would be huge.

Issues in favour of the site included:

- A respondent advised: best place in Feniton to build much needed new houses the land is relatively flat and being on the North Weston side of Feniton does not interfere with Old Feniton and has no heritage impact its nice and close to a train station giving residents easy access to Exeter and Honiton
- The site promoter of Feni_11 confirms that the site scores well in SA terms and is generally unconstrained. Landscape impacts could be minimised through planting of a landscape buffer and development on the site would represent a logical and integrated extension of the settlement with some degree of containment within the existing settlement framework. The creation of a landscape buffer on the northern, eastern and western extents of the site, with associated native structural tree planting, would substantially reduce landscape and visual effects with respect to sensitive visual receptors. Furthermore this would provide an new defensible landscape buffer to the north of Feniton, creating a softer and more integrated settlement edge to the village than exists at present.

LP_Feni_10 - Westlades, Feniton - Potential 'Second Best' Allocation

Objection to site Feni_10 as a development choice were raised on the grounds of:

- This site is north of the railway line. It is some distance away from access to the A30. Traffic already backs up through the village and to the north when the level crossing barriers are down.
- Too close to old Feniton Village and will spoil the land.
- Building here would be detrimental to the government's aim to cut greenhouse gasses by removing these well established trees. As such a small site it would be impractical in achieving your target of delivering houses.
- Would exacerbate traffic pressure on old Feniton with existing roads already used as a "rat-run".

In support of the site was representation reading:

- As owners of site LP Feni 10, we can confirm that this site is deliverable as set out in Local Plan Appendix 2 Site Selection- interim findings at Tier 4 settlements.

LP_Feni_15 - Long Park Farm, Feniton - *Potential 'Second Best' Allocation*

Objection to site Feni_15 as a development choice were raised on the grounds of:

- This site is currently an established orchard. Trees are so important to the world an orchard really should be prioritised over other forms of land use.
- Alongside the inherent food production value, the area is a wildlife habitat. Rare bird have been seen in the trees and owls are heard at night.

Issues in favour of the site included:

From agents, Mantra Planning, acting for the landowner made representation advising that LP_15 and land to the east, Feni_03 (though in representation reference is to Feni_13 and also Feni_12) are suitable and appropriate for development they consider:

- Feniton is, in principle, an appropriate location to accommodate residential development, they cite the role and function if settlement study;
- The note lack of landscape, heritage or ecological constraints as highlighted in the sustainability appraisal
- Weight should not be attached to Devon County Council education capacity comments as concerns raised are a widespread strategic issue, apply to many sites and education provision can be addressed;
- It is considered it is highly unrealistic that the sites will be utilised for mineral working in the future;
- In landscape terms the site is shielded from wider landscape views
- The site feels close to the centre of Feniton;
- A Planning Permission in Principle applies to part of the overall site area;

LP_Otry_20 - Land to the south-east of Bridge Cottages - *Potential 'Second Best' Allocation*

Objection to site Feni_20 as a (employment site) development choice were raised on the grounds of:

- This site is currently an orchard. Trees are a vital part of our environment. Granting permission for these to be replaced by buildings would fly in the face of the recently adopted Devon Tree Strategy.

- Green Lane cannot handle increased traffic. The exit onto Ottery Road is dangerous and includes a blind corner, there are also blind pinch points by the railway bridge.
- There is no pedestrian footpath along any part of Green Lane.
- The building is a chicken farm which hasn't been used for 3 years but will be used in future to enhance our agricultural heritage here in Feniton.
- The roads around this site flood from surface runoff.

Mantra Planning, acting for the landowner advised:

- Otry_20 has been submitted for inclusion as an employment/ Commercial site. There is an existing agricultural barn on site which would benefit from Class R (GPDO 2015 as amended) Permitted Development Rights. The wider site is available for commercial/ employment use and this includes the erection of new buildings. The current trees surrounding the site are that of a commercial apple orchard, a suitable tree strategy could be implemented which sees partial removal of the orchard.

Issues in favour of the site included:

- There are very few employment opportunities in Feniton. The vast majority of people who work therefore have to travel - mostly by car.
- There is an existing agricultural barn on site which would benefit from Class R (GPDO 2015 as amended) Permitted Development Rights. The wider site is available for commercial/ employment use and this includes the erection of new buildings. The current trees surrounding the site are that of a commercial apple orchard, a suitable tree strategy could be implemented which sees partial removal of the orchard.

Omission sites at Feniton

- The land promoter requests that further consideration be given to sites Feni_12 and Feni_13 as they were harshly assessed and prematurely discounted from the site selection process based on landscape impacts and mineral consultation area designation. Proximity to existing properties mean that onsite mineral working would therefore raise a number of issues in terms of impacts on existing neighbour amenity levels. It should also be noted that, unlike many of the other MCA sites in the plan area, the mineral rights for these sites are in private ownership and are unlikely to be sold to any third party. Therefore, it is highly unrealistic that the sites will be utilised for mineral working in the future and further consideration should be given to their allocation in the draft Local Plan, particularly given their suitability in all other areas.

- The sites were assessed as being of “some prominence in landscape terms.” We would respectfully point out that the sites are bordered by residential development on two sides and rising land to the south; any development would therefore either be obscured by or seen within this built context. In addition, any formal application would be informed by a landscape assessment to ensure a sensitive scheme is developed and mitigation measures incorporated to avoid, reduce or offset significant negative effects on the landscape.

Hawkchurch - General issues

- The Environment Agency note that the village is in the catchment of the River Axe SAC and that development will need to be nutrient neutral.
- Object to Hawkchurch being classified as a Tier 4 settlement, it should not accommodate development.
- The scale of development proposed at Hawkchurch is far too high given it has had the highest number of new houses of any village in East Devon in the last 20 years.
- 20 houses is more realistic for Hawkchurch.
- Development will increase the number of cars travelling along narrow lanes, safety concern.
- Lack of jobs and facilities apart from a shop and once a week bus service.
- Increasing population by 30% without improving local services and transport is irresponsible.
- Proposed development will mean a loss of tranquillity in this rural village.
- Adverse impact on water supply and sewerage.
- Insufficient infrastructure, facilities and roads for additional development.
- Will spoil character of beautiful area.
- Hawkchurch Parish Council (PC) – The PC makes the following conclusions regarding the draft Local Plan:
 - The inclusion of Hawkchurch as a Tier 4 village is based on flawed assumptions (including the claimed hourly bus service which in reality is one service per week) and does not align with the spatial and low carbon strategic policies.
 - The level of proposed development is too high, is not required locally and there would be a significant negative impact from the scale of development on the character of the place.
 - It would be preferable for the Neighbourhood Plan to identify sites for smaller scale development that is in keeping with local needs.
 - The proposed development is identified as a 32% increase in housing. Does the 32% include exception sites in the calculation rather than development within the settlement boundary only.
 - Siting large scale development in Hawkchurch runs counter to the spatial and low carbon strategies as proposed.
 - The figure of 38 houses does not account for the 0.6Ha of employment space and should be reduced accordingly.
 - The approach to each allocation has not been consistent with regard to the minimum / maximum allocations for each site.
 - Changes to the settlement boundary are not clear in terms of both revisions made and the rationale for the inclusion of land.
- Hawkchurch Parish Council (PC) - Multiple residents commented on the lack of public transport, increased traffic, access at the junction, narrow lanes, congestion in the

centre of the village, inadequate infrastructure (drainage, sewerage, and water supply systems), impact of traffic on pedestrians (including elderly residents and children on roads with no paving), and limited local employment opportunities. A housing estate shouldn't be in a rural village, the proposed density of housing is too high, partly green site, actively used pastureland, the shop is a tiny community shop and has limited supplies, the children's playground in the centre of the village is adjacent to the proposed access road junction with the main street, the shop is located on the site to be developed.

- Hawkchurch Parish Council (PC) - Reasons cited against the development of employment land at this site include: Noise, increased traffic, access, narrow lanes, spoil the peace and tranquillity of the place, won't create employment for villagers, even more parking needed, current industrial units are not fully occupied.

LP_Hawk_01 - Norton Store, Hawkchurch - Preferred Allocation

- This site was rejected in the SHLAA 2014 because of poor access.
- CG Fry & Son Ltd on behalf of client -
 - G Fry supports the inclusion of Hawkchurch as a Service Village capable of supporting limited new development. Such new development is the lifeblood of smaller settlements and helps to support local services and facilities which are, in the case of Hawkchurch, the primary school, public house and village/community shop. Such new development is often promoted by landowners themselves or SME housebuilders such as C G Fry and the quality of development and quality of local engagement around its delivery is highly likely to be far superior to larger PLC/volume housebuilder schemes. Schemes like this support the SME sector and support the delivery of high quality local open market and affordable homes.
 - C G Fry has instructed a technical team to assess Hawk_01 and those investigations confirm that the site is suitable, available and deliverable and has no obvious constraints beyond the matter of phosphates in the River Axe SAC catchment. Studies undertaken include preliminary drainage assessment, foul drainage assessment, wider utilities assessment, ecological assessment, landscape assessment work on physical access into the site and wider connectivity.
 - C G Fry can see no practical reason why this proposed allocation should not proceed and C G Fry looks forward to engaging with the Hawkchurch community to deliver a high-quality housing-led scheme.
 - C G Fry would also be delighted to engage with Officers to discuss and share the evidence base at the appropriate juncture. For now, C G Fry looks forward to the allocation being retained in the emerging LP.
- Suggestion that the allocation would represent over development of the site / locale.

- Totally unsustainable with only one bus per week. The heavy traffic on the single lanes is already dangerous. And everyone who moves into the proposed new dwellings will drive cars. So much for your vaunted climate change policy!!
- Concerns expressed from multiple representations over lack of infrastructure with implications for road network, school places, health services, flooding, drainage, sewage, local facilities.
- Concerns expressed over local biodiversity, trees and hedgerows.

LP_Hawk_02 - Field south-east of Hawkchurch School, behind and adjacent to School Close - *Rejected Site*

- The number of homes planned for Hawkchurch, 38, is simply not feasible. This a a small, rural village, accessed by narrow lanes, serviced by a once-a-week bus, with only a village shop as an amenity. The village school will not be able to accommodate the number of additional children, the road cannot support an additional 38-76 vehicles, there are limited job opportunities within the village so people will have to travel for work if not able to work from home. The proposed locations mean the houses will be 'packed in', and therefore unlikely to be in keeping with the area and road access to the sites is already poor. 38 homes is simply too many for the village to support.
- This is not an appropriate site for further development. I believe the building of some additional homes can be supported, but not a development of 38 homes. Hawkchurch does not have the infrastructure to support an increase in population of that order. A cap of 20 homes should be applied.

Omission sites at Hawkchurch

- None identified

Kilminster - General issues

- None identified

LP_Kilm_01 - Land off Shute Road, Kilminster - *Rejected Site*

- Destruction of farmland.
- This is just another piece ribbon development as are most sites in Kilminster. Inappropriate.
- Outside the original building area and too far out of the village. Encroaching on the Shute Woods area.

LP_Kilm_02 - Birchwood Farm, Shute Road, Kilminster - *Rejected Site*

- Outside of building line, developments should be infill only.
- Destruction of farmland impacts on the ability to provide crops for both human and animal consumption. There would be a huge impact on the local ecology and habitat, especially with climate change looming.
- Ribbon development and destruction of high quality farmland essential to UK's food security.
- Would not want this site developed.

LP_Kilm_03 - Land off Springhead Lane, Kilminster - *Rejected Site*

- Poor road access, loss of habitat
- The site would be a great location for a small-scale housing development for locals and key workers. The site borders some woodland, but it has been untouched for many a year and has not been maximised for its ecological benefit.
- Ribbon development causing destruction of high quality farmland essential to UK's food security.
- This is outside the existing building area of the village. It is good agricultural land - we do not want to lose it.
- Would not want this site developed as access off springhead lane would mean increased traffic through the centre of village to access the A35, via The Street, The Hill and George Lane.

LP_Kilm_04 - Paddock off Springhead Lane, Kilmington - Rejected Site

- Outside of building line, Poor road access, loss of unspoilt habitat
- Ribbon development. Destruction of high quality farm land essential to UK's food security.
- Would not want to see this site developed as access to it via Springhead Lane it would result in increased traffic through the central part of the village to reach the A35 via The Street, The Hill and George Lane

LP_Kilm_05 - Land at Pit Orchard, Bimbom Lane, Kilmington - Rejected Site

- Poor road access, too close to conservation area, loss of habitat
- Outside of building line, road access unsuitable, not suitable for development
- Inappropriate development onto narrow dangerous lane; public transport and amenities such as shops, schools etc. only accessible via such lanes or A35. All residents would require personal transport.
- This site should not be developed as access is poor via very narrow single track roads- BimBom Lane and Silver Street. Traffic from the site would have to use these lanes and also George Lane, increasing vehicles traveling through the central residential part of the village to reach the A35.

LP_Kilm_06 - Land at Gore Lane, Kilmington - Rejected Site

- Destruction of high quality agricultural land essential to UK's food security. Development would be adjacent to narrow dangerous lanes and would vastly increase vehicular traffic as there is no public transport serving this area and highly unlikely to be any in near to mid-term, maybe never.
- Would not want to see this site developed as it would result in increased number of vehicles traveling through the residential area of the village to reach the A35. The site is also on higher ground so the development would be very visible to the rest of the village.

LP_Kilm_07 - Land adjoining Breach, Kilmington - Rejected Site

- Outside of building line, poor road access, loss of more unspoilt habitats.
- Infill but access via poor quality lane and adding traffic to narrow lanes.
- Situated on a pleasant footpath - would spoil the walk.

- Not the place for a lot of housing which would not sit well with the surroundings. One or two houses could fit.

LP_Kilm_09 - Land east of George Lane, Kilmington - Preferred Allocation

- Devon County Council (DCC) state this site has surface water flooding and an unmapped ordinary watercourse which should be considered as part of the design.
- DCC note this site falls within the Waste Consultation Zone for Gammons Hill Waste Transfer site, which should not be constrained by development (see Waste Plan Policy 10).
- Place Land disagrees with the statement that the Neighbourhood Plan takes precedence over the Local Plan. The Local Plan will take precedence once adopted, and the Parish Council has acknowledged that the Neighbourhood Plan may need to be reviewed.
- Place Land supports the proposed capacity of 37 dwellings for Kilm_09. This is based on further design work that has been undertaken, including landscape appraisal, drainage strategy, ecology survey, and heritage appraisal. The findings of the additional surveys confirm that the site is capable of accommodating around 39 dwellings.
- This site in the heart of the village - should be developed smartly to provide new pedestrian and nature interconnecting pathways in the village. Housing should be affordable, low density & very low energy to address the imbalance of older generations & larger homes in the village. This could be a clear demonstration of how to do in-fill development the right way rather than just for profit.
- Allocation of 37 homes - too many. Smaller is preferred
- Although it is a shame about the proximity to the busy A35 (could a reduction in the speed limit be reconsidered) it is a good site. It would be really important to consider some shared ownership properties for local people. There is a very limited supply of housing stock in the village. This is particularly difficult for first time buyers who are key workers and on a limited income.
- The last development only included affordable rentals which obviously does not help anyone get onto the property ladder.
- A logical develop site but will be noisy from A35 and be dangerous vehicular access either via George Lane or direct onto A 35
- Good site, nearer to the village facilities and easy access to the main road
- It is an AONB site with rooks and buzzards nesting. It will have a huge impact on my property and our road.

LP_Kilm_10 – Land to the west and south-west of The Old Inn, Kilmington - Potential ‘Second Best’ Allocation

- DCC note this site falls within the Waste Consultation Zone for Gammons Hill Waste Transfer site, which should not be constrained by development (see Waste Plan Policy 10).
- Very poor road access as on to the A35, too close to listed building.
- Too large a development area. High impact on local community.
- Obvious position although increased vehicular traffic onto Whitford Rd/Old Inn junction to be deplored.
- Not a very good site really - would only be good for 1 or 2 houses.
- Already has houses near this site, a good way to fill in, good access to main road.
- Adding this site with just five houses to the A35 site next to it, seems logical in the future. However too many new houses too quickly could increase the population too quickly and the village school and village hall etc would not be big enough. This site would give access via a footpath from George Lane to the recreation ground and on to Whitford Road. The car park at the Old Inn needs to be a reasonable size as in the summer it can get full.

LP_Kilm_11 - Land to the east of and off Whitford Road between Ashes Farm and The Beacon Chapel, Kilmington - Preferred Allocation

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to proximity of Grade 2* listed Church.
- Devon County Council (DCC) state this site has surface water flooding and an unmapped ordinary watercourse which should be considered as part of the design.
- Density of housing should be suitable for the site, i.e. plenty of space not crammed in for maximum profit. Needs to fit in with adjacent properties. Should have shielding from light pollution from the nearby Petrol Station.
- Ideal site especially for bungalows for the older population, & would free up larger homes in the village.
- This housing makes sense for elderly people as it's close to the village hall, churches, recreation ground for walking and shops. It fits well along the Whitford Rd.

LP_Kilm_12 - Land on the north side of Shute Road (Gapemouth Corner), Kilmington - *Rejected Site*

- Outside of building line, loss of village buffer to A35, already had loss of trees on this site which should be allowed to regenerate
- Recent destruction of tree cover means the noise block for the village has been lost. Properties here would be noisy and add dangerously to traffic onto the A35. Not a sensible development.
- It should be tidied up and planted with more trees to be a sound barrier from the road noise.
- Would not want to see development on this site as the woodland will create a buffer between the busy, noisy A35 and the housing in the central part of the village.

Omission sites at Kilmington

- None identified

Musbury - General issues

- The Environment Agency note that the village is in the catchment of the River Axe SAC and that development will need to be nutrient neutral.

LP_Musb_01a - Baxter's Farm, The Street, Musbury - Preferred Allocation

- Devon County Council, as landowner, supports allocation as site but feels that no boundary should be draft to separate it from Musb_02 until a development layout is put forward through a planning brief or a planning application.
- The Environment Agency note that part of the north of the site is within floodzone 3 and state that this area should be set aside as GI, with a buffer of at least 8m from the watercourse, free from built development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Opportunity for retention of farmstead buildings that contribute to the character and appearance of CA
- Use of village hall could cause disturbance for future residents so better for small industrial starter units.
- Conversion of existing buildings good.
- Not suitable for traveller pitches because of potential for clashes with village hall and pub.

LP_Musb_01b - Baxter's Farm, The Street, Musbury - Rejected Site

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Agree site should not be used.
- Representation on behalf of landowner for other sites in Musbury queries deliverability of site.

LP_Musb_02 - Maidenhayne Lane, Musbury - *Rejected Site*

- Representation on behalf of landowner stated that the land is no longer available for development (it has been withdrawn from the HELAA process).
- Agree this orchard site should not be used – access is dangerous.

LP_Musb_03 (whole site) - Churchpath Road, Axminster Road, Musbury - 3a - *Potential 'Second Best' Allocation* / 3b - *Rejected*

- Representation on behalf of landowner states that access to Doatshayne Lane could be improved and there is scope for a new access to the A358 with a footway providing safe access to the bus stop and village services.
- Representation on behalf of landowner suggests whole site should be allocated to allow holistic approach and making the most of site opportunities and contributing to meeting overall housing targets.

LP_Musb_03a - Churchpath Road, Axminster Road, Musbury - *Potential 'Second Best' Allocation*

- Do not think should be included as green field and access is potentially dangerous.

LP_Musb_03b - Churchpath Road, Axminster Road, Musbury - *Rejected Site*

- Agree site should not be built on as it is a green field.

LP_Musb_04 - Field known as Adcroft, Mounthill Lane - *Rejected Site*

- Representation on behalf of landowner states that the lower parts of the site could be developed with a negligible impact on landscape and any residual impacts could be mitigated as there is significant space for landscaping and view to the Grade 1 listed church are largely screened by woodland. Site is well related to core of village.
- Agree site should not be built on as it is a green field.

LP_Musb_05 - Doathayne Lane, Musbury - *Planning Permission Granted*

- Representation on behalf of landowner states that the site should be considered as there is no extant planning permission.
- Would provide some family housing in village with high proportion of older people.
- Close to allotments and playing field for families.

Omission sites at Musbury

- None identified

Newton Poppleford - General issues

- Surprised that Newton Poppleford has no allocations given it is well-served by buses, and a new and thriving primary school.
- Make Back Lane more vehicle-friendly and it will have potential for development.
- Create a public park in the Back Lane area to adjoin existing recreational areas, and at the former railway station.
- Village centre could be improved.

LP_Newt_01 - Goosemoor Farm, Exeter Road, Newton Poppleford - Rejected Site

- Happy with the proposal to refuse.

LP_Newt_02 - Littledown Farm, Littledown Lane, Newton Poppleford - Rejected Site

- Happy with the proposal to refuse.
- A couple of respondents noted that there is no safe way to walk or cycle to the village.
- Turning onto Exmouth Road is dangerous.
- Motorists speed along Exmouth Road.
- In AONB and site is covered with trees and wildlife.
- Access via Littledown Lane is on a corner and unsuitable for additional traffic.

LP_Newt_03 - Land north of Burrow Lane, Newton Poppleford - Rejected Site

- Agree site should not be developed as in the AONB and building would be highly visible.

LP_Newt_04 - Land to the west of Badger Close, Newton Poppleford - Rejected Site

- Happy with proposal to refuse development as no safe way to walk to village facilities, AONB and good agricultural land.
- Previous application to build was refused on appeal.

LP_Newt_05 - Land to the east of Exmouth Road, Newton Poppleford - *Rejected Site*

- Happy with proposal to refuse development as no safe way to walk to village facilities, AONB and good agricultural land.

LP_Newt_07 - Land off Back Lane, Newton Poppleford - *Rejected Site*

- Access onto Venn Ottery Road is too narrow for more cars.
- Agricultural land in AONB.

LP_Newt_09 - Field adjacent to Hawthorn House, Back Lane, Newton Poppleford - *Rejected Site*

- Access onto Back Lane is too narrow for more cars.
- Agricultural land in AONB.

LP_Newt_10 - Land north of Back Lane, Newton Poppleford - *Rejected Site*

- Access onto Back Lane is too narrow for more cars.
- Heavily wooded and in AONB.
- Adverse impact on wildlife.

LP_Newt_11 - Oak Tree Garage, Station Road, Newton Poppleford - *Rejected Site*

- Access to A3052 is dangerous and on a floodplain.

LP_Newt_12 - Coal Yard, Newton Poppleford - *Rejected Site*

- No Comments

LP_Newt_13 - Land off Down Close, Newton Poppleford - *Rejected Site*

- Too far from village centre along unpaved, unlit footpath which is unsafe for a large section.
- Important trees and site on rising ground where development would be visible against the treeline.
- Impact on AONB.
- Impact on wildlife.

LP_Newt_14 - Seniors Farm Yard, Newton Poppleford - *Rejected Site*

- Happy to refuse as access to village facilities by foot or cycle is incredibly dangerous as is access for cars turning onto A3052.

LP_Newt_15 - Land to the north of Exeter Road, Newton Poppleford - *Rejected Site*

- Dangerous for people to walk or cycle to village facilities and dangerous to turn onto A3052 as on a bend.
- Floodplain.

LP_Newt_16 - Land to the rear of Langford Mews, Newton Poppleford - *Rejected Site*

- No Comments

LP_Newt_18 - Pearces Yard, Bridge End - *Rejected Site*

- This section of the A3052 is extremely dangerous not only for walkers and cyclists but for vehicles trying to turn onto the A3052.
- Low lying land on floodplain.

Omission sites at Newton Poppleford

- None identified

Otterton - General issues

- Otterton Parish Council held consultation events that informed a survey and discussion on various forums. The findings were that:
 - 6/10 respondents were against further development;
 - The preferred development site was Otto_04, followed by Otto_2, Otto_3a, Otto1 and lastly Otto_3b;
 - 94% voted in favour of more affordable housing noting that the village contains a lot of small privately rented homes and demand from first time buyers outstrips supply;
 - There is concern about elderly people having to leave the village to downsize and 89% supported more housing suitable for older people;
 - Only 33% wished to see larger family homes;
 - Almost unanimously parishioners supported local people seeking to buy their own property, including first time buyers – self build schemes were not widely supported;
 - People were concerned about the effect of further housing development in terms of traffic congestion and many wanted to see a new car park; and
 - Any new housing should have individual driveways for each home.
- What measures are in place to replace green space is developed?
- Will existing trees and hedges be retained?
- Properties along main road are prone to flooding.
- Hourly bus service is at risk.
- Severe traffic congestion in the summer.
- Single track lanes unsuitable for development.

LP_Otto_01 - Land off Bell Street, Otterton - *Potential 'Second Best' Allocation*

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Title should read 'Land off Behind Hayes (The Old Orchard).'
- Open space is part of character of village with views up to hills from centre of village.
- Risk of runoff to neighbouring properties.
- Difficult access via narrow roads with poor junctions – may need to demolish houses.

- Loss of mature trees.
- Destroys only green lung in centre of village.
- Contributes to distinctive character of village.
- Old orchard sites within village should be protected as form part of open, linear settlement pattern
- Some respondents advise that development would be contrary to neighbourhood plan which retains open areas and rural character.
- Increase in traffic.
- Impact on wildlife.
- Should not be considered because local plan says there is no need for an increase in housing
- The landowner supports the allocation of this site for housing. It will help support the vitality of the settlement and provide a source of rural housing for local residents, including affordable, and diversify supply.
- Surely only part of the site is needed for just ten homes – neighbourhood plan prioritises smaller homes.

LP_Otto_02 - Land adjacent to the North Star, Otterton - *Potential 'Second Best' Allocation*

- The Environment Agency note that part of the site is within floodzone 3 associated with the main river Otterton Brook. The site would need to be subject to SFRA2, and the sequential and exception tests before being allocated. While it may be possible to build outside the area at risk of flooding on the eastern portion of the site, the floodplain cuts it off from Ottery Street so it is unlikely there would be any safe access or egress.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Would like to consider further assessment when available
- Suitable site as long as development does not exacerbate flooding in the village.
- Only site with safe and reasonable access to highway network
- Site remote from school and shop.
- A couple of respondents were concerned about access from a busy narrow road with no footway.
- Narrow stretch of Ottery Street and would need new bridge across Otterton Brook.
- A few respondents were concerned that the lower part of site is at risk of flooding.

- A couple of respondents noted that the site is next to conservation area and development of the site would have a negative impact on it.
- Incompatible with policies ONP1b and ONP31 of the neighbourhood plan.
- Loss of natural habitat.
- Would destroy beauty of fields and open spaces in AONB.
- Contrary to neighbourhood plan.
- Previously Otterton was considered unsuitable for development and no explanation has been given for what has changed.
- The landowner supports the allocation of this site for housing. It will help support the vitality of the settlement and provide a source of rural housing for local residents, including affordable, and diversify supply.

LP_Otto_03a - Land at Hayes Lane, Otterton - *Potential 'Second Best' Allocation*

- Several respondents thought the site would be difficult to access and develop.
- There were concerns that the development could compromise children's playground.
- A number of respondents considered the proposed allocation to be contrary to neighbourhood plan as on high ground.
- Detrimental to character of AONB and village.
- Does Otterton require additional housing?
- Not adequately assessed.
- The landowner supports the allocation of this site for housing. It will help support the vitality of the settlement and provide a source of rural housing for local residents, including affordable, and diversify supply.
- Very steep slope and narrow lanes will restrict removal of soil.

LP_Otto_03b - Land at Hayes Lane, Otterton - Rejected Site

- Steeply sloping site unsuitable for development.
- Very prominent site where building would be seen across the valley and harmful to character of AONB and village.
- The landowner supports the allocation of this site for housing. It will help support the vitality of the settlement and provide a source of rural housing for local residents, including affordable, and diversify supply.

LP_Otto_04 - Land east of Rydon Close - New Site - not assessed

- The Environment Agency note that part of the site is within floodzone 3 associated with the main river Otterton Brook. The site would need to be subject to SFRA2, and the sequential and exception tests before being allocated. While it may be possible to build outside the area at risk of flooding on the eastern portion of the site, the floodplain cuts it off from Ottery Street so it is unlikely there would be any safe access or egress.
- Savills on behalf of FWS Carter and Sons state this site is incorrectly shown in yellow on the interactive map meaning “not assessed”, however this site was assessed in the HELAA and considered to be available, suitable and probably achievable.
- A couple of respondents would prefer affordable housing to permission for conversion to MOT testing and motorcycle repairs.
- Remote from village.
- Several respondents expressed a preference for housing rather than employment.
- There was some support for more affordable units here or homes for the elderly of the village.
- Flood risk.
- Difficult to walk to village.
- Disruption to wildlife.
- Should not extend beyond existing boundary.
- No need for extra homes.
- Most appropriate site provided flooding issues can be addressed.

Omission sites at Otterton

- None identified.

Payhembury - General issues

- None identified.

LP_Payh_01 - Units and agricultural field at Slade Barton - *Rejected Site*

- No comments

LP_Payh_02 - Agricultural field adjoining Payhembury village recreation ground - *Rejected Site*

- No comments

LP_Payh_03 - Agricultural field adjoining Payhembury built-up area - *Rejected Site*

- No comments

Omission sites at Payhembury

- None identified

Plymtree - General issues

- Agents for FW Clarke - We support the change to the settlement hierarchy and the amended distribution strategy. The amended settlement hierarchy includes Local Centres (Tier 3), which encompasses Woodbury, Lypmstone, Broadclyst, Colyton and Budleigh Salterton. Tier 4 includes, amongst others, Plymtree. At present, no housing growth is expected at Plymtree at all over the plan period whereas many other Tier 4 settlements are expected to experience some housing growth. We object to the lack of housing growth expected at Plymtree.
- Agents for J Persey -
 - Request for the Plan to allow limited development to meet local needs at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimple. The identification of Plymtree as a Service Village is supported. The village has a good range of facilities (school, shop, pub) and is not environmentally constrained being entirely outside of the AONB. It ultimately has more facilities and is less environmentally constrained than many other villages in the district. It is a perfect village to receive an allocation, and the scale and form of growth can be carefully controlled through local development management policies so that it complements the character of the area and helps meet local needs. Collectively, villages could make a meaningful contribution to the district's overall housing land supply and growth of this type would also have the advantage of diversifying supply, meeting local needs and supporting rural facilities.

LP_Plym_01 - Agricultural field adjoining the north-west of Plymtree village - *Rejected Site*

- No comments

LP_Plym_02a - Agricultural field adjoining and contained within Plymtree village to the north, east and south - *Rejected Site*

- No comments

LP_Plym_02b - Agricultural field adjoining and contained within Plymtree village to the north, east and south - *Rejected Site*

- No comments

LP_Plym_03 - Land at Plymtree - *Rejected Site*

- Bell Cornwell for J Persey - Urges the LPA to provide a formal allocation in Plymtree on the Plym_03 land and have provided further technical information to demonstrate how this could be achieved.

LP_Plym_04 - Two agricultural fields between Plymtree village and Norman's Green - *Rejected Site*

- No comments

Omission sites at Plymtree

- New site presented to west of village hall.

Sidbury - General issues

- Any development at Sidbury is likely to close the gap with Sidford.
- Developers should contribute towards a footpath/cycle link from Sidbury to Sidmouth, preferably along the river.

LP_Sidm_11 - Burnt Oak (existing garage block), Sidbury - *Planning Permission Granted*

- This site has already obtained planning permission. Although given the access to the site is on a blind junction on the busy A375 I am surprised that this alone did not lead to the site being rejected when previously considered.

LP_Sidm_25 - Field bordering junction of Cotford Road and Roncombe Lane, Sidbury - *Rejected Site*

- This agricultural site has been submitted for residential purposes to accommodate just under 40 properties.
- The site is situated within the AONB, with landscape visibility, on the edge of Sidbury village outside of its boundary settlement. Access to the site would be either from Roncombe Lane, which is a narrow lane or from the busy A375 at a point where joining it from the site would not be appropriate and potentially dangerous.
- Some or all of the site is contained within Flood Zone 3 and there is high risk flooding along roads adjacent to the site and the development of this site could add to increased storm water runoff will exacerbate downstream flooding.

LP_Sidm_34 - Land south of Furzehill, Sidbury - *Potential 'Second Best' Allocation*

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

- Developing this site will change the character of Sidbury and close the Green Wedge with Sidford, contrary to Policy 3 in the Neighbourhood Plan and Policy 78 in Draft Local Plan. Particularly with regard to setting of ancient monument and LB.
- DCC suggest access from Furzehill but there is likely to be third party land ownership (“ransom strip”) in this area which creates uncertainty on delivering the site.
- DCC state this site has multiple ordinary watercourses running through it and any proposed development should improve these watercourses and avoid culverting.
- The Town Council does not support the allocation of employment land within the AONB at Sidm_34.
- SVA -
 - This development will change the character of Sidbury and close the Green Wedge with Sidford (contrary to Policy 78 of this draft Local Plan and Policy 3 and Map 9 of the adopted Sid Valley Neighbourhood Plan which seeks to prevent settlement coalescence). - Separately, this Sidbury development proposal provides for 0.15 Hectares of Employment Land but there is no demand for Employment Land – refer to the Sidford Business Park proposal where the land is now for sale due to the property owners’ stated admission that there is ‘no demand for Employment Land’.
 - Additionally, this proposal is contrary to this Draft Local Plan’s Policy 75 as the site is within the AONB and it will not enhance the AONB. Rather this proposal will be detrimental to the AONB.
 - Also, this proposed site is contrary to Policy 3 of the adopted ‘Neighbourhood Plan for the Sid Valley 2018- 2032 seeking to avoid ‘Settlement Coalescence’).
- Sidmouth Cycling Campaign state the potential site for allocation in Sidbury (Sidm_34) encompasses the route of the proposed off-road cycle route from Sidford to Sidbury that Devon County Council are promoting. Construction of this route and links to the adjacent housing should be included as a condition of any planning permission for this site. This would support Strategic Policy 65 and Policy 66
- Agents for Land Value Alliance - In our view, second choice sites such as SIDM_34, which are being relied upon as part of the draft housing supply and distribution should logically and sensibly be identified as preferred allocations. Such a change would also ensure that Sidbury, identified as one of the sustainable villages in the District, is served by an allocation within the Draft Plan, land should be allocated at Sidbury to ensure the local housing need is addressed and there are no other realistic site options capable of accommodating housing to meet the need.
- Proposal for 38 dwellings is not based upon a robust assessment of site capacity.
- No reference in the site assessment to the proximity of Sidbury Castle Scheduled Monument, development will adversely affect its setting.
- We understand the need for additional affordable housing in the area but consider this location and additional housing in Sidbury will have a very serious lasting negative effect on all village folk and its limited infrastructure. For the following critical reasons:

1. As indicated above, the existing road system is clearly unable to support additional traffic and this will already be further taxed by the approved new Sidford Industrial Site and the LP_Sidm_1 Sidbury housing traffic.
2. Widening / Realignment of the existing road is not an option.
3. The small car park located in the centre of the village is generally fully occupied.
4. The Village Primary school is operating at maximum capacity with no space for further development of the site.
5. Delivery and collection of school pupils is very hazardous' causing significant traffic disruption at times.
6. Drainage within the fields is complex with several active springs. At least 4No draining in large volumes into our grounds.
7. Provision of adequate access to all new properties will be complex / expensive due to the significant gradient of the sites / drainage plus forming a safe viable access onto the main road.

Omission sites at Sidbury

- None identified

Stoke Canon - General issues

- None identified

LP_Stok_01 - Land lying to the west of Chestnut Crescent, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_02 - Oakhay Barton, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_03 - Imbert Green Technology Park, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_05 - Field 7414, Stoke Road, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_06 - Fields 7425 & 8333, Stoke Road, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_07 - Oakhay Barton, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_08 - Land and buildings known as Stoke Cottage, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_09 - Bridge Farm, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_10 - Field 6700 & 6907, Stoke Road, Stoke Canon - *Rejected Site*

- No comments

Omission sites at Stoke Canon

- None identified

Tipton St John - General issues

- Ottery St Mary Parish Council comment that a site for a new Tipton St John Primary School should be found within the village.
- Devon County Council and the County Councillor request that a primary school site is allocated in Tipton as it is identified in the provisional Schools Rebuilding Programme.
- The agent acting on behalf of the owners of Site LP_Otry_04 have suggested two alternative schemes, one for housing and one for a relocated school with some self/cusom build housing to ensure that this facility remains in the village. They also support designation as a tier 4 settlement and object to the site being a second, rather than first, choice

LP_Otry_04 - Land south of Otter Close, Tipton St John - *Potential 'Second Best' Allocation*

- 45 homes on this site would be too dense, out of character with the area.
- Highway safety concerns- traffic already speeds here, poor access onto the main Sidmouth to Ottery road, lack of pavements, volume of extra traffic, too close to Otter Close entrance
- Impact on sunken lane
- Need for extra houses should be demonstrated
- Previous appeal was refused and the reasons remain relevant
- Lack of public transport
- The site is relatively level and is well screened with mature roadside hedging.
- Visual impact is minimised as the plot sits in an area between already established housing developments.
- The school could be relocated to this site, along with some custom/self build houses to ensure that the village remains sustainable and a tier 4 settlement
- If the school relocates to OSM then this site isn't justified and the tier 4 status should be lost as the village is unsustainable

LP_Otry_06 Land next to Coombe Vale, Tipton St John - *Rejected Site*

- Will harm the appearance of the AONB and character of the valley, impact on tranquility.
- Unacceptable impact on ecology- cuckoos, barn owls and woodpeckers are on the site.
- The road is a narrow lane already impacted by modern vehicles. Can't be widened as banks are not in applicants control.
- Access to the main road on the cross roads is already hazardous

- Site is far from the village centre, increasing residents dependency on cars and contrary to sustainable objectives of the local plan.
- The proximity of the steep Goyle means that the south part of the land is liable to erosion and subsidence in addition to being part of the flood plain
- Will impact on mature trees and a diverse range of habitats and wildlife including wetland, woodland and meadow.
- Will increase flooding and run off

Omission sites at Tipton St John

- The field opposite (Coombe Bank) to Site LP_Otry_04 was submitted to the SHLAA in 2015 and should be included as a better development site. Respondent states “We will send supporting documents”. A plan has subsequently been submitted confirming that the land lies to the west of Coombe Bank, adjoining the crossroads
- The relocated primary school could be sited on LP_Otry_04 along with a small number of custom/self-build houses. (Submitted on behalf of site owner)

Uplyme - General issues

- Lyme Regis Town Council note that no suitable sites have been submitted as yet and request that any that do come forward minimise the impact on Lyme Regis, particularly traffic and parking issues.

LP_Uply_01 - Land at Sidmouth Road, Uplyme - *Rejected Site*

- Uplyme Parish Council is against development of this land and are satisfied that EDDC have taken the same view about the unsuitability of the site.
- Representation on behalf of landowner comment that:
 - The land is available for development and could provide around 120 homes with 50% of these being affordable.
 - The draft Dorset Local Plan states that more than 20% of the housing stock in Lyme Regis is second or holiday homes resulting in a lack of affordable housing in the town.
 - A greater stock of affordable and affordable home ownership products are needed to prevent younger families being forced out of Lyme Regis.
 - East Devon and Dorset should cooperate to allocate land for housing as the 40 units allocated in the emerging Dorset plan is insufficient.
 - The East Devon Local Plan should allocate this site to meet the cross boundary needs of neighbouring Dorset Council.
 - There is no evidence of joint working to address the needs of Lyme Regis under the 'Duty to Cooperate';

Omission sites at Uplyme

- None identified

Westclyst - General issues

- Westclyst is not a separate community, it is part of Broadclyst.
- Westclyst relies on nearby Plinhoe and Broadclyst for services and infrastructure as, apart from the school and corner shop, no extra infrastructure has been delivered in Westclyst.

LP_BrcI_01 - Land to the east of Parkside Crescent - *Planning Permission Granted*

- No Comments

LP_BrcI_04 - Land adjacent to Poltimore Park - *Rejected Site*

- Support, the site should be rejected as development would increase the flood risk and reduce the land for nature in the area.

LP_Polt_03 - Land to the north of Old Park Farm, Pinn Hill - *Rejected Site*

- Support, the site should be rejected, as building in a flood zone would be foolish, and it would have an adverse effect on Poltimore Park. It would be better to build on brownfield sites.

Omission sites at Westclyst

- None identified.

West Hill - General issues

- West Hill PC state the village has had significant growth of more than 10% since the start of the current Local Plan in 2013 and is being burdened by with disproportionate levels of housing.
- West Hill PC and residents are concerned about infrastructure inadequacies such as over capacity of schools, health services, highways, water supply, sewage, inadequate open space and recreation facilities.
- West Hill PC note the outskirts of the village are a considerable distance from the village centre facilities, exacerbated by the hilly nature of the lanes which have no footways or street lighting – further development here would not be sustainable.
- West Hill PC state it is very important that a Green Wedge covers the entire area of Neighbourhood Plan Policy NP4 to prevent coalescence and preserve the separate identities of Ottery and West Hill.
- 57 homes are just about manageable, but the planning application for site at Oak Road is unsustainable and would be unacceptable in addition.
- Many of the sites in the HELAA are in “valued views” protected by policy NP6 in the Neighbourhood Plan so are not suitable for development.
- Important to have mixed use development with some affordable homes to attract younger people.
- Retain West Hill as it is to preserve a jewel in the landscape where people and wildlife cohabit.
- As there has been no recent increase in employment in West Hill, any new residents will be forced to commute elsewhere to work.
- The River Otter has a phosphate issue which must be addressed before development.

LP_GH/ED/23 - Land lying to the south of Holyfield - *Rejected Site*

- This site is too far from facilities.
- Developing this site would remove the existing green corridor between West Hill and Ottery.
- This will increase car traffic along narrow single track lanes.
- Building here will increase surface water run-off and flood risk to Ottery lower down the hill.

LP_West_01 - Land at Westhayes / Hayes End, Eastfield - *Potential 'Second Best' Allocation*

- DCC state that nearby land has been associated with surface water flooding, and it is currently unclear whether there is a feasible discharge point for this site.
- West Hill PC note mixed views from residents, some see it as appropriate for low density development if existing trees are protected, others value the wooded land, wildlife, and screening from the busy B3180.
- A developer (Morrish Homes) objects as part of site is protected as s.41 habitat, TPOs, Nature Recovery Site.
- A developer (Morrish Homes) states this site should not be considered available until the landowner can demonstrate that necessary rights are in place for access and connection of services.
- A developer (Morrish Homes) objects due to proximity to busy road (B3180) causing noise.
- Object as future house owners will want to remove trees due to loss of light and for fear of damaging their house.
- Support this site, tree removal can be avoided in a similar way to previously approved schemes such as Hayes End.
- Object as topography means that developing this site will cause overlooking of neighbouring properties.
- Object as development will lead to flooding of lower neighbouring gardens.
- Object as site is home to much wildlife such as owls, buzzards, bats.

LP_West_02 - Field at junction adjacent to Prickly Pear House (at junction of B3180 Exmouth Road and Bendarroch Road, West Hill) - *Rejected Site*

- West Hill PC object due to high landscape impact, forming one of the valued views in Neighbourhood Plan Policy NP6.
- The site owner supports allocation of the site. In summary, he states that it performs similarly to the preferred options other than in landscape impact and access to services. Landscape impact can be mitigated by a landscaping scheme, long and mid range views are blocked by existing trees and development would be seen in context of existing built form. The site is a similar distance from services as the preferred sites and a pedestrian link can be provided.
- This could be a suitable site as long as there is no through road from Eastfield and the adjacent junction on the B3180 is improved.

LP_West_03 - Rear of Hasta-La-Vista, Windmill Lane - Rejected Site

- West Hill PC object due to high landscape sensitivity, with previous planning applications and appeals dismissed on these grounds.
- Access will be suitable if old dangerous tree was removed as per recent tree report.

LP_West_04 - Land adjoining Windmill Lane - Preferred Allocation

- DCC note the concerns of residents over surface water run-off to the east of this site, so a robust drainage strategy will be required.
- DCC state this site seems to be very steep so infiltration will need to be considered very carefully.
- West Hill PC and residents main concern is traffic impact as Windmill Lane is narrow and not suitable to provide access.
- Object due to poor visibility from exit to Bendarroch Road, where cars go too fast making it unsafe for pedestrians.
- Support developing this site but should be at a density comparable with surrounding properties to maintain a village character.
- Object as surface water runs off the field to Windmill Lane which cannot cope.
- Local residents have commissioned a flood risk screening report which concludes that surface water flooding affects the southern part of West_04 and across to West_06 – the EA's surface water flood map showing a very low risk of surface water flooding is not accurate.
- Concern about the adverse impact on wildlife, including deer, bats and owls.
- Object as there are TPOs on all trees along with border.
- Object as it will devalue my house.
- Application for two dwellings (13/2624/FUL) in northern part of site was dismissed at appeal as harmful to character and appearance of the area, so do not understand how it can now be preferred.
- A developer (Morrish Homes) objects given the long route for pedestrians to facilities along un-paved and unlit roads, with no guarantee that access could be provided through West_06.
- A developer (Morrish Homes) objects due to adverse landscape impact.
- Support allocation as will round off the development area.
- Support this site as easy access to B3180 and A30.
- Support as close to facilities through the adjacent Moorlands estate.
- There have been large developments in this area of West Hill over recent years, and not fair to add more in the same area.

LP_West_05 - Land off Oak Road - Rejected Site

- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.
- West Hill PC object due to restrictive covenant limiting any development to two dwellings.
- West Hill PC and residents object because of impact upon TPO covering the site boundary and on-site tree.
- West Hill PC and residents object due to significant distance from village centre along hilly lanes with no footways or street lighting.
- West Hill PC object because Oak Road access is a “valued view” in the Neighbourhood Plan.
- West Hill PC object as within high pressure gas pipeline middle/outer zones.
- The agent for the site owners objects to the failure to allocate the site. The assessments are not consistent, this site ranks similarly to preferred sites in many respects. Many sites are subject to minerals constraints but this is not recorded, other sites are further away from facilities and contain TPO'd trees but rank higher. It is disputed that the site appears as open countryside.
- A developer (Morrish Homes) objects to non-allocation of this site, noting technical reports on transport, trees, ecology and landscape in current planning application 22/2533/MOUT show the site is suitable.
- A developer (Morrish Homes) notes that Devon County Council has withdrawn its minerals objection.
- A developer (Morrish Homes) states that there will be no ‘category 3 or 4’ development within the site, so the Health and Safety Executive will not advise against development, so this constraint no longer applies.
- Object as unacceptable wildlife impact, including proximity to East Devon Heaths SPA/SAC, rare moths and three very rare bats.
- Contrary to Neighbourhood Plan.
- Object as Oak Road is a single track lane, dangerous to add more traffic.
- The exit onto the B3180 is on a blind bend and extremely hazardous.
- The bottom of this field is a bog and would require water pumps to drain it.
- The pebble bed ground is unstable for development.
- Development will cause unacceptable landscape impact.
- Not clear whether the current surface water run-off that affects part of Higher Broad Oak Road will be exacerbated.
- Facilities are well over the 1km quoted in the site assessment: should state 1.6km to shop/PO; 1,7km to school, village hall; 2km to main bus route, British Legion; 2.2km to church; 2.3km to garage, dentist, hairdresser.

LP_West_06 - Land north and east of Eastfield - Preferred Allocation

- DCC state this site seems to be very steep so infiltration will need to be considered very carefully.
- West Hill PC have concerns regarding traffic impact due to narrow roads.
- West Hill PC are concerned about flooding from the many springs and aquifers in the site.
- Blue Cedar Homes control this land and support its allocation but should be increased to 30 dwellings – there are no constraints and intend to submit planning application in next few months.
- Blue Cedar Homes object to 0.1 ha employment land as there is no justification for this.
- A developer (Morrish Homes) objects as uncertain whether access can be obtained via Eastfield Gardens.
- A developer (Morrish Homes) objects due to presence of TPOs, potential impact upon root protection areas and may be pressure to remove trees by future residents.
- A developer (Morrish Homes) notes this site formed part of a larger site that was dismissed at appeal in 2011 (APP/U1105/A/11/2155312) due to adverse landscape impact.
- Support developing this site but should be at a density comparable with surrounding properties to maintain a village character.
- Local residents have commissioned a flood risk screening report which concludes that surface water flooding affects the southern part of West_04 and across to West_06 – the EA's surface water flood map showing a very low risk of surface water flooding is not accurate.
- There is a protected copse and oak tree in the north eastern corner – will this be cleared?
- Concern about the adverse impact on wildlife, including deer and owls that nest in the trees.
- Part of larger site dismissed at appeal (10/0761/MOUT) so do not understand why it's now appropriate to allocate.
- Any link between West_04 and West_06 will create a rat-run.
- Very good location for development, close to local amenities.
- Access from Eastfield Orchard is narrow and often obstructed by parked vehicles.
- There have been large developments in this area of West Hill over recent years, and not fair to add more in the same area.
- House prices mean that local need is not being met.

LP_West_07 - Land at Lower Broad Oak Road - *Rejected Site*

- West Hill PC object due to restrictive covenant preventing development;
- West Hill PC object as a “valued view” in the Neighbourhood Plan;
- West Hill PC and residents object due to significant distance from village centre along hilly lanes with no footways or street lighting.

LP_West_08 - Land adjacent to Badgers Bend, Lower Broad Oak Road - *Rejected Site*

- West Hill PC object as a “valued view” in the Neighbourhood Plan.
- West Hill PC object as high landscape sensitivity.
- West Hill PC object as site is covered by a TPO.
- West Hill PC object as boggy site with surface water flood risk.
- Access is along narrow, twisty, and hilly roads with no pavements, causing a safety risk for pedestrians and cyclists.

LP_West_09 - Land adjoining The Gap, Lower Broad Oak Road - *Rejected Site*

- West Hill PC object due to high landscape sensitivity.
- West Hill PC object due to surface water flood risk.
- Access is along narrow, twisty, and hilly roads with no pavements, causing a safety risk for pedestrians and cyclists.

LP_West_10 - Land east of The Pygthle, Lower Broad Oak Road - *Rejected Site*

- West Hill PC object due to unsuitable access onto Lower Broad Oak Road.
- West Hill PC object as prominent site with high landscape sensitivity.
- West Hill PC and residents object as significant distance from village centre along hilly lanes with no footways or street lighting.
- Site should be excluded from the settlement boundary.

LP_West_11 - Land adjacent to Hilden, Lower Broad Oak Road - *Rejected Site*

- West Hill PC object as site is inaccessible along an unmade track, remote from village.

LP_West_12 - Hollybrook Nursery, Exmouth Road - *Rejected Site*

- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.
- West Hill PC object as remote from village; dangerous access onto the B3180.

LP_West_13 - Weggis Farm - *Rejected Site*

- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.
- West Hill PC object as significant distance from village centre along hilly lanes with no footways or street lighting;
- West Hill PC object as access onto Oak Road is a “valued view” in Neighbourhood Plan;
- West Hill PC object as within high pressure gas pipeline middle/outer zones;
- West Hill PC object as in a Mineral Safeguarding Area.

LP_West_14 - Pikes Farm - *Rejected Site*

- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.
- West Hill PC and residents object as significant distance from village centre along hilly lanes with no footways or street lighting.
- West Hill PC object as within high pressure gas pipeline middle/outer zones;
- West Hill PC object as within Mineral Safeguarding Area.
- Planning and Design Group on behalf of landowner recommends allocation as not in a protected landscape and surrounded by large mature trees so minor landscape impact; on-line shopping and high fuel prices mean people are travelling less by car, making pedestrian access less important; proximity to high pressure gas pipeline does not preclude development.
- Landowner states this site has 7 out of 12 facilities within 1,600m, one more than the preferred allocations.

- Object as site is attractive agricultural land, covered by the “valued views” in Neighbourhood Plan Policy NP6.

LP_West_15 - Flower Cottage, Elsdon Lane - *Rejected Site*

- West Hill PC object due to restrictive covenant preventing housing.
- West Hill PC object as access is required over land owned by another individual.
- West Hill PC object as adverse landscape sensitivity due to woodland and open land in centre of village.
- Concerned about surface water run-off affecting homes below the site.

LP_West_16 - Elsdon House, Elsdon Lane - *Rejected Site*

- West Hill PC object as woodland is a Local Green Space in the Neighbourhood Plan Policy NP5 and covered by a TPO.

LP_West_17 - WI Building and adjoining land, West Hill Road - *Rejected Site*

- West Hill PC note this site was dismissed at appeal, and object as it is a “valued view” in the Neighbourhood Plan forming part of the approach to West Hill from Ottery.
- West Hill PC object due to surface water flood risk.
- Adjacent to a sewage pumping station and therefore not desirable for residential use.
- Site can probably only accommodate three dwellings.

Omission sites at West Hill

- None identified

Whimble - General issues

- The following question was asked as part of the consultation - “What level of additional housing development do you feel is appropriate for Whimble for the period from 2022 to 2040?” The responses recorded were:

	Responses	% of respondents
Zero	11	32%
Between 1 and 50 new homes	15	44%
Between 51 and 100 new homes	1	3%
Between 101 and 250 new homes	3	9%
Between 251 and 500 new homes	2	6%
501 or more new homes	2	6%
Total	34	100%

- Whimble Parish Council highlight a desire for the village to remain separate from Cranbrook and for no further land between the settlements to be developed. The Parish Council point out the single track elements of the highway network and the potential for an increase in housing to exacerbate existing problems. They also raise concerns about confusion over the level of housing development proposed for the village. Evidence from the neighbourhood plan is cited that residents do not wish to see more than 10 new properties and these should provide small clusters focused on affordable housing and for local young people.
- The Environment Agency advises that Whimble has a long history of flooding and has a need for additional flood management infrastructure. Any development which satisfies the sequential and exception tests will be expected to contribute to helping to reduce flood risks overall for the community.
- The Environment Agency advise that all the preferred and second-choice sites here have some degree of FZ3 and/or FZ2 present within them. These sites would need to be subject to SFRA2, and the sequential and exception tests before being allocated.
- DCC state the SUDS hierarchy should be followed, all off-site surface water discharges from development should mimic “greenfield” performance – see CIRIA SUDS manual and LLFA guidance.
- Protect our Whimble and Rockbeare Group (POW+R) have the guiding principle of self-determination for the citizens of the Parish of Whimble as expressed through the neighbourhood plan that it is preparing with the Parish Council.
- POW+R believe that the parish of Whimble has contributed sufficiently to the housing needs of East Devon through the 500 homes allocated in the parish through the Cranbrook Plan.

- POW+R is concerned that development to the west of Whimble would jeopardise the green wedge between Cranbrook and Whimble.
- POW+R consider the maximum number of swellings each 5 years should be 10 with 50% of these being affordable.
- POW+R set out historical background to orchards and wish to retain them.
- More than 500 homes should be built as villages have always provided an array of services – the original form of sustainability.
- Should not be trying to push new houses through with a new local plan as the existing local plan is still valid.
- Whimble can support some new development to strengthen the community but more than 20 would put too much strain on local services.
- Several respondents supported up to 50 new homes and felt that more would be unacceptable for a number of reasons including, would go against draft policies, road infrastructure, should preserve greenfield sites and unsustainable for local infrastructure.
- Several respondents felt that no more homes should be built for a variety of reasons including, contrary to neighbourhood plan, very car dominant with poor train service, will change character of area, lack of services, no demand for new homes, impact on flooding and wildlife, loss of traditional orchards and facilities and poor, single track roads.
- Train service is infrequent.
- No more than 10 homes should be built together to keep a vernacular appearance and avoid estates.
- Don't build to west of village to keep separation with Cranbrook.
- Whimble Parish Council asked for residents comments to be carefully considered and highlighted a desire to remain separate from Cranbrook.
- The Parish Council expressed concern about the single track road network serving the village and the poor road surfaces.
- Absorption of Whimble into greater Exeter should be avoided.
- The Parish Council also raised confusion over the number of new homes proposed for the village and stated that neighbourhood plan surveys showed that residents wanted no more than ten new homes in small clusters to support younger people in need of affordable homes.
- Concerns around the capacity of the roads accessing the village (all have significant lengths of single-track width with no footways or lighting) and
- Development sites options will impact on the rural buffer between the village and the planned extension of Cranbrook.
- Several respondents were concerned about flooding.
- Several residents were concerned about the ability of the road network to accommodate additional traffic.

- Sewerage system already at capacity.
- Open green spaces should be protected.
- Whimble needs protecting even though it's not in an AONB.
- Only one shop and a lack of facilities in the village mean no more development.
- Small development should be allowed at Daisymount.
- Development should be kept west of the M5.
- Any further development should benefit the village for example by providing a foot/cycle path to the Hand and Pen.
- Unique character of village must be preserved – people have chosen to live in a village, not a town.
- An increase in population of up to 10% is acceptable, but should be phased over time and change should happen organically.
- A new school should be built, and Church Road improved before any more development.
- Opportunities should be provided for small businesses along old A30.
- Cranfield already meets need for new houses in this area.
- Orchards are priority habitats under the UK's Biodiversity Action Plan – the orchard next to Bramley Gardens provides habitat for little owls, green woodpeckers, Greater spotted woodpeckers, tree creepers and tawny owls, all of which use the old apple trees to nest in and feed on. Several species of bats have been seen in the summer.

LP_Whim_03 - Land to the south side of Grove Road - Potential 'Second Best' Allocation

- DCC note this site falls within the Whimble Critical Drainage Area which means this catchment needs to be protected from development pressures.
- Increased flood risk to surrounding properties.
- Lack of open space in village.
- Sewerage system already at capacity.
- Increase traffic along narrow roads.
- Loss of rural character

LP_Whim_04 - Hits Farmhouse, Lilypond Lane - Rejected Site

- No comments

LP_Whim_07 - Land fronting Broadclyst Road - *Potential 'Second Best' Allocation*

- DCC note this site falls within the Whimble Critical Drainage Area which means this catchment needs to be protected from development pressures.
- Site floods.
- Sewerage system already at capacity.
- Loss of historic orchards.
- Small site but would extend village edge so not appropriate for development.

LP_Whim_08 - Land west of Church Road and Bramley Gardens - *Potential 'Second Best' Allocation*

- Forms part of important green wedge separating Whimble from Cranbrook.
- Sewerage system already at capacity.
- Increase traffic along narrow roads.
- Loss of historic orchards.
- Agree part of site could be developed using existing access from Bramley Close, but development should not extend up to Church Road so that feel of village is preserved.
- Relief road should link Bramley Close to Church Road and a large station car park provided.
- Loss of rural character.
- Risk to school children from additional traffic as no footway along many village roads.

LP_Whim_09 - Land at Church Road and Woodhayes Lane - *Rejected Site*

- No comments

LP_Whim_10 - Land adjoining Woodhayes Country House - *Rejected Site*

- No comments

LP_Whim_11 - Land at Station Road - *Preferred Allocation*

- The Environment Agency advise that part of the site is at risk of flooding and an appropriate buffer should be set aside for green infrastructure and kept free from built development and to provide biodiversity net gain.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Would like to consider further assessment when available.
- DCC note this site falls within the Whimble Critical Drainage Area which means this catchment needs to be protected from development pressures.
- POW+R note previous designation as land of local landscape importance and wish to keep as green space, preferably with public access.
- Object as this area of land has been designated for recreational purposes linked to Richard Whiteway Memorial Land, a key person in Whimble's history.
- Contrary to Neighbourhood Plan as development is for over 10 dwellings.
- No evidence of a need for 33 homes in Whimble.
- Substantial harm would be caused to Grade II listed Slewtton House.
- The mature hedgerows, trees, grassland, and meadow support abundant wildlife and must be protected.
- DEFRA website shows the site and north east of site as Woodland Priority Habitat and Woodland Improvement Area, Priority Habitat (woodland and orchard), and a national habitat and network enhancement zone 1.
- Development would be harm the landscape, including trees, watercourse, setting of houses on Talaton Road and tranquility, wildness, intactness and enclosure.
- The site is a key local viewpoint and open space – development would harm views.
- All access routes are narrow country lanes, so development would exacerbate existing problems of safety, congestion, noise and impact on amenity and historic environment.
- Site is in a critical drainage area and development would cause flooding off-site.
- Memorial grounds great village asset and of local landscape importance.
- Traffic issues and lack of footways.
- Villages have always rejected building on this site, including a petition signed by 425 people in 1988.
- Designated as land of local landscape importance.
- Parish Council withdrew its nomination as its 'preferred site' in 2015.
- Insufficient open space for village and site meets open space criteria.
- Considered unsuitable for development in 1995 due to traffic and environmental issues.
- Site floods.
- Should be kept for wildlife or used as open space.

- Field acts as dark sky zone.
- Inadequate sewerage system.
- Designated Land of Local Amenity Importance in 1999 in local plan.
- Land to north designated national wildlife site.
- Loss of rural character.
- Regret loss of open area but makes sense to build here if accept need for 10% growth.
- Tree in middle of old cricket pitch is unique, mentioned in Wisden and should be preserved as of historic importance.
- Walking/cycling track should be provided to link with other tracks.
- Logical development site that would not result in loss of agricultural land since it was previously a cricket ground.
- Relatively small site that has not been in use since cricket on the site ceased and likely to remain unused. Also surrounded by housing and acceptable for development.
- A number of respondents noted that 500 homes had been allocated in the parish for Cranbrook and felt that this was sufficient.
- Need homes for local working people – many adult people living with their parents.

LP_Whim_12 - Land at Lillypond Lane - *Rejected Site*

- No comments

LP_Whim_13 - Land north of Grove Road - *Potential 'Second Best' Allocation*

- DCC note this site falls within the Whimble Critical Drainage Area which means this catchment needs to be protected from development pressures.
- Increased flood risk to surrounding properties.
- Lack of open space in village.
- Sewerage system already at capacity.
- Increase traffic along narrow roads.
- Loss of rural character

LP_Whim_14 - Land at Perriton Barton - *Rejected Site*

- No comments

LP_Whim_18 - Field between Orchard Lea and Church Road - *New Site - not assessed*

- No comments

LP_Whim_19 - Hitts Farm, Lillpond Lane - *New Site - not assessed*

- DCC note this site falls within the Whimble Critical Drainage Area which means this catchment needs to be protected from development pressures.

LP_Whim_20 - Orchard Lea - *New Site - not assessed*

- No comments

Omission sites at Whimble

- None identified.

Sites suggested at other settlements

Some consultation responses propose sites for development at settlements not contained in Chapter 6 - i.e., not identified as a Principal Centre, Main Centre, Local Centre or Service Village. The following bullet points summarise the main issues raised in these site-specific responses, by settlement.

Colyford

- Developer (Baker Estates) proposes land at Colyford (Coly_05 and Coly_07) for development, noting that the full extent of these sites would be disproportionate to the size of the settlement, but smaller-scale development should be considered.

Cowley

- Allocate land at the A377 at Cowley for Park and Ride (policy 66) and affordable housing to meet local need and that of key workers (plan attached to JLL response).
- Upto_04

Talaton

- Concerned that Tala_13 has been overlooked as not shown on the Commonplace interactive map despite being in HELA

Upottery

- Developer states Land at Manor Green, Upottery (0.2 hectares) should be allocated for up to five dwellings, a highly suitable site for a range of reasons including accessible location, will not extend into the countryside, no heritage or ecological constraints.

Venn Ottery

- Concerned that Newt_20 has been overlooked as not shown on the Commonplace interactive map despite being in HELAA.

Woodbury Salterton

- Concerned that Wood_45 has been overlooked as not shown on the Commonplace interactive map despite being in HELAA.

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



PDF 6 of 10

Chapters 7 to 10

Pages 325-411

July 2023

Chapter 7 - Tackling the climate emergency and responding to climate change

General matters raised in respect of this chapter included

- The Environment Agency consider that the plan contains many good statements, objectives and policy interventions regarding climate change and the natural environment. However, it could be bolder and more ambitious and requires a completed evidence base in several areas to ensure it helps to deliver sustainable and resilient development. This includes: preventing deterioration and restoring the water environment; ensure new development and existing communities are adapted to and resilient to the challenges of climate change and achieving biodiversity net gain informed by the local nature recovery strategy.
- Devon County Council welcome the focus on climate change but would like more reference to and alignment with the Devon Carbon Plan.
- This section is particularly welcome. Policy 34 regarding Embodied Carbon is welcome as it will hopefully lead to the reduction in the number of properties being demolished simply to build a grander replacement.
- Exeter City Council support the emphasis in the plan on tackling the climate emergency and responding to climate change. They advise development of brownfield sites first should be a key element of the spatial strategy to help tackle the climate emergency, this approach is the Exeter plan.
- Exeter City Council welcome an emphasis on new and innovative forms of planning and delivery to ensure new developments, in particular any new settlements, are carbon neutral.
- Sidmouth Cycling Campaign state Figure 8, in this chapter, presents “The Energy Hierarchy” which forms the basis for interventions that developers will need to prioritise to ensure the net-zero target is met. The first and most important item on the hierarchy is “Development location: Minimise need to travel and provide access to sustainable transport”. We agree with this approach; however, there is no further reference to development location or transport in the remainder of this chapter, or how the developer will demonstrate their interventions towards net-zero.
- Exeter Cycling Campaign wish to see a section on how transportation (both public and private) will be decarbonised. Granted, transport is a Devon County competence, but the way development is designed greatly shapes the transportation choices people make.
- It is no longer acceptable to merely accept that ‘people will drive’. We need to be moving away from the ‘predict and provide’ model to a ‘decide and provide’ model for transport

(and housing) design. With transport the most carbon-polluting sector the Local Plan would benefit from bolder measures that will nudge and enable different travel habits.

- We suggest that this chapter should include paragraphs after Figure 8 detailing how the items on “The Energy Hierarchy” will be addressed. For instance, Strategic Policy 1 directs development to sustainable locations and Chapter 11 prioritises sustainable travel.
- The Exeter Transport Strategy 2020-2030 is cited in the evidence base. The Local Plan would be improved by having greater alignment with this strategy. For instance, the Local Plan needs more detail in how to deliver one of the Transport Strategy’s key proposal: Park and Ride/Change: “Park & Ride sites on all key corridors will provide a realistic sustainable travel option for those trips from rural areas into the city that can’t feasibly be served by traditional public transport services”. All P&R planning should seek to ensure that P&R sites don’t actually induce additional driving. Under Policy 66 the Local Plan states that some sites/routes will be protected but these appear to be Exeter’s P&R sites, will ED identify additional ones.
- In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid’s infrastructure to enable NGED to supply electricity in the most efficient and cost-effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.
- Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm:
 - a) whether the lines can be accommodated within the development site; or
 - b) the viability and feasibility of diverting and/or undergrounding overhead lines.
 - This includes, where relevant, ensuring the agreement of third-party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy. In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. NGED does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:
 - 1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines

and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.

- 2. Early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;
 - 3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.
 - 4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED.
-
- Devon Wildlife Trust consider that policies 29, 30, 31, 32, 37 and 38 should be reworded to include reference to the requirement for enhancement of our natural environment.
 - Should consider impact of helicopters on coastal erosion – make houses vibrate.
 - Plan needs to set out current thinking about where coastal defences will and will not be placed.
 - Not enough emphasis on flood mitigation – current drainage and sewage systems are unable to cope
 - How will extreme events be causing surface flooding be dealt with?
 - Otter Valley Association commend the use of an energy hierarchy and the policies on renewable energy and zero carbon. The aim to be carbon neutral by 2040 is ambitious. Whilst solar farms are the most energy efficient, use of all new roofs for solar power should be a requirement. Also retrofitting large industrial and employment buildings would help to protect the best agricultural land needed for food production.
 - National Farmers union has a target for the agricultural vision for the farming industry to be Net Zero by 2040, which aligns with the target for East Devon. The farming industry has a key role to play in delivering this aspiration.
 - Lyme Regis Town Council support the commitments to carbon neutrality, and renewables but think more should be done about the impact of transport in general and visitor transport in particular. The Town Council suggest that developer contributions could be made towards mitigation measures.
 - Hawkchurch PC -
- As drafted the policies on renewable energy do not correctly reflect the balance given in the National Planning Policy Framework (NPPF) or in the supplementary planning guidance on renewable and low carbon energy. They do not give sufficient weight to the adverse impacts, give no weight to cumulative impacts (which is contrary to the guidance) and do not reflect the need to take into account the views of local communities likely to be affected by them. In addition, they do not reflect the need to identify opportunities for co-location of

supplies and consumers. We are seriously concerned that the wording of the energy storage policy does not take into account the national guidance.

- We have noted that other local authorities have used the criteria that renewable developments 'do not have an overshadowing or overbearing effect on nearby habitations' and in the case of solar development that the 'noise, glint and glare is mitigated adequately'. We would welcome inclusion of such terminology in policies 29 -32 as this would help protect the beauty of East Devon and prevent adverse impacts on both communities and wildlife.

- Hawkchurch is particularly experienced in relation to energy installations with numerous solar farms. We now face multiple applications for large scale industrial storage facilities, which are likely to be Lithium-ion battery storage. This is primarily due to the location of the National Grid Substation which is due to expand its connections. When surveyed 85% of households said they regard Lithium-ion battery storage as unsafe. Furthermore 85% of households also felt that such installations were industrial in nature and should only be permitted with strong controls on safety and impact – including the cumulative impact over time and coupled with solar farm development.

- We recognise the need for energy storage but believe EDDC should be considering the district good from locally generated or stored electricity versus supporting the national interest (e.g. storing energy which will ultimately be used elsewhere in the country). By encouraging storage, and where possible generation, to be co-located with heavy consumers (be it industry, residential, hospital etc) it would make certain that the benefit is within the district.

- While we recognise that the local plan is primarily concerned with planning controls, the energy and climate change strategy take no account of the need to improve the condition of homes. A significant number of respondents to our survey said that they would have solar panels if they were affordable. Some are trying to get solar panels but there is a shortage of suppliers and there appears to be a lack of interest in small scale deployments. It would be helpful if the strategy could cover these aspects and enable real changes to residents.
- Barratt Homes note that the evidence base for the policy is more than 2 years old and suggest that a policy that goes beyond the Building Regulations is not necessary or justified.

Policy 27 - Climate Emergency

- The Environment Agency advise that this policy focuses on reducing emissions but does not include any provisions requiring adaptation/resilience to those changes. Adapting and becoming resilient to the many impacts of climate change is just as important as reducing carbon emissions and is an area where local planning authorities have more control. Resilience to climate change is about more than just adapting to increased flood

risks. For example, it should include providing space for nature to adapt. Within the East Devon local plan this should include space for the Exe Estuary SPA/RAMSAR, and Axe SAC. The River Otter is also particularly unstable, with threats to the built environment including at Cadhay, Ottery St Mary, Tipton St John, Harpford, Newton Poppleford, with these processes liable to increase as a result of climate change.

- South West Water recommend additional criteria to minimise water consumption.
- Devon County Council (DCC) recommend incorporating the need to reduce emissions by 50% by 2030 from 2010 levels, and to add bullet points relating to 20-minute neighbourhoods and the principle of One Planet Development.
- DCC note one of the best ways to help the climate emergency is to reduce the need to travel – query whether a new community helps with this given no facilities from day one.
- Vital that all development should be of the highest energy efficiency.
- Newton Poppleford and Harpford Parish Council think that all schemes should meet this policy.
- Clyst Honiton Parish Council agrees with the direction, but believes that all development policies must reflect the need to achieve net zero carbon emissions by 2040. Development proposals agreed in the 2020s will not usually come to fruition for 5 years, so there is not much time to make a difference. District Heat Networks must be powered by green energy, not fossil fuels.
- 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.
- Home Builders Federation generally supports EDDC in seeking to become carbon neutral, delivering net zero development and maximising opportunities for renewable energy.
- Home Builders Federation considers it is not appropriate for EDDC to set its own standards. It adds to the complexity of policy, regulations and standards that housebuilders already must comply with. It undermines economies of scale for product manufacturers/ suppliers/developers if Councils’ policies are not standardised. Policy exceeds Level 4 of the Code for Sustainable Homes and conflicts with March 2015 Written Ministerial Statement and PPG. Difference between national and local requirements has been held to be unsound
- Housing Association planning consortium agrees with policy. But EDDC should be wary of the ways the policy could impact on development viability which may restrict the provision of affordable housing in East Devon
- Agents for Bloor Homes support net zero ambitions but advise that whilst the development industry is moving at pace to net zero, huge advances in supply chains and technologies are required to deliver net zero buildings. It is important that these

challenges are recognised in draft Policy and the targets outlined are not introduced immediately on plan adoption but phased in over a suitable timeframe.

- Recommend the words “where there are no unacceptable impacts” are replaced with a more permissive policy which supports renewable energy unless there is “significant and demonstrable harm” to the stated environmental considerations.
- Proposed new motorway service on the M5 north of Exeter would be consistent with this policy.
- Unclear what “maximising” means and how this can be secured and balanced alongside other policy considerations – more appropriate to use the term “optimise”.
- Greenslade Taylor Hunt, for a client, advise - whilst the principle of moving to a low carbon or carbon neutral society is supported, it should not be at the expense of compromising development viability, or go beyond the already stringent requirements of the Building Regulations. Policy 27 should be amended to clarify that carbon neutral development should be an aspiration and not an absolute requirement.
- Sidmouth Arboretum -
 - Currently, many organisations are planting new trees, woodlands and hedgerows to offset carbon emissions. Providing, transporting and actually planting these whips has a carbon cost and these plantations will not have grown enough to move into positive sequestration for a number of years. Retaining a mature tree will contribute to carbon sequestration immediately and a healthy mature tree will sequester more carbon than many whips.
 - Policy 27 stresses the importance of retaining existing buildings. It would strengthen the policy if it had a fourth action, retaining existing mature trees and hedgerows where possible.
- Council's passive approach to addressing the climate emergency is disappointing. Council should take urgent action, such as requiring insulation for all full-time residences and increasing taxes on second homes and Airbnbs. EDDC should also involve local people in managing energy supplies.

Policy 28 - NetZero Carbon Development

- The Environment Agency welcomes this policy and are pleased to see a requirement for new homes to be future proofed to avoid temperature discomfort as a result of rising temperatures. That is just one way in which new homes (and new development more generally) need to be designed differently to be resilient to climate change and help to achieve net zero carbon emissions. Achieving the ambition for Net Zero will require new development to incorporate things like grey water reuse, onsite energy generation, efficient insulation, green roofs, garden water storage, SuDS which are beneficial for natural conservation and water quality.

- South West Water believe a similar policy should be included to require an assessment of annual projected water use to demonstrate the water reducing measures.
- Devon County Council (DCC) support calculation of whole-life cycle carbon emissions but should go further to expect developers to reduce embodied carbon emissions (we highlight Mid Devon's current work on this) - cross-refer to Strategic Policy 34.
- DCC state there is little reference to retrofitting existing housing stock to ensure it can reduce carbon impact.
- Newton Poppleford and Harpford Parish Council consider that this policy should be implemented as an integral part of new development. New developments should also create their own energy to avoid the need to install more wind and solar farms.
- Clyst Honiton Parish Council believes that the policy is not strong enough. It does not sound like a requirement, but rather a suggestion. The policy needs to be made more specific and enforceable.
- Whilst the Council may need to apply innovative and ambitious measures in order to reach its carbon neutral goal, the policy and supported text as worded is in excess of national standards and places a burden on residential development to achieve this. Given that the carbon neutral target is at the end of the plan period, a cascade approach could help developers with a period of transition to more stringent requirements.
- In terms of energy performance and monitoring, the Council should work with developers on a mutually agreeable approach. The current suggestion of energy performance data on 10% of dwellings would be extremely difficult to implement, especially once dwellings are occupied and no longer under the control of the developer. Therefore, it may be more appropriate for the Council to work with volunteering residents in gathering data.
- The scope of the desired deliverables should not undermine the deliverability of viable development. The wording of draft SP28 presents the identified requirements (carbon statement and Whole Life Cycle Carbon Assessment) as all having to be satisfied/addressed as a prerequisite for major development to be supported. The detail to be expected in these statements should be proportionate to the form of a future planning application.
- Home Builders Federation has concerns that EDDC is setting its own standards above those set nationally. Adds to development cost and complexity, which may lead to issues for house builders. May have viability implications. How will the policy be monitored? Much of the responsibility for emissions is outside the homebuilding industry's control. How will the policy interact with other policies on energy efficiency or resilience to heat, as well as viability and deliverability.
- Home Builders Federation -Policy should not apply to all developments, and should recognise scale of development in relation to the policy's requirements

- Housing Association planning consortium agrees with policy. But EDDC should be wary of the ways the policy could impact on development viability which may restrict the provision of affordable housing in East Devon
- Bloor Homes support policy objectives but raise concerns around issues of detail, they specifically advise that policy should follow the Government definition of net zero
- Barratt David Wilson Homes assert there is a clear disconnect between Policy 28 and Government's forthcoming Building Regulations and policy. Policy 28 needs to be subject to Viability assessment.
- Barratt David Wilson Homes – queries whether policy serve a clear purpose regarding consideration of temperature discomfort as this is controlled by Building Regulations
- Barratt David Wilson Homes question whether it is possible to implement the requirement for the in-use performance of a building to be as close to its design intent as possible. BDW have already queried the implementation of a similar policy at Cranbrook eg how a developer can compel a homeowner to provide the information. How the LPA will process/manage the information. And implications for homeowners if remedial action is needed. BDW consider that the Building Regulations process is sufficient
- Agents for Bourne Leisure challenge advise that to require all development to deliver in advance of 2040 is not consistent with national policy. Amongst other matters they advise that the term 'commercial' referenced in the draft policy is not defined in the plan, but the context in which it is used in the plan suggests that it does not cover tourist accommodation and facilities. This is helpful as it would not be possible to provide carbon statements or Whole Life Cycle Carbon Assessments for caravans. For the avoidance of doubt, it would be helpful for the emerging plan to clarify that such assessments will only be required where it is feasible to do so.
- CG Fry supports principle, but objects to mandatory provisions and seeks to include viability considerations in policy.
- Site promoter query need for policy when better considered through the building regulations. More clarity is required about whole life cycle carbon assessments and concern about lack of viability testing.
- A developer is concerned that the evidence base is already more than two years old and was prepared for GESP rather than East Devon specifically.
- Developer has concerns that the policy goes beyond existing Building Regulations standards and the Future Homes Standard.
- Recommend the words "where there are no unacceptable impacts" are replaced with a more permissive policy which supports renewable energy unless there is "significant and demonstrable harm" to the stated environmental considerations.
- Proposed new motorway service on the M5 north of Exeter would be consistent with this policy.

- Include a transition period for delivering net-zero up to 2040 so developers can adjust to these higher standards.
- Allow more flexibility in the policy to allow the use of new local carbon and renewable energy technologies that emerge over the plan period.
- Does not explain what the delivery of net-zero carbon emissions means or when/how this will be achieved.
- No need to refer to homes being 'future proofed' to avoid temperature discomfort as this is already covered by Part O of the Building Regulations.
- Are the Council setting up a finance scheme towards off-site carbon reduction measures? Otherwise not clear how this would work in practice.
- For a client Greenslade Taylor Hunt advise policy should not be at the expense of compromising development viability, or go beyond the already stringent requirements of the Building Regulations. The requirement for major developments to provide calculations for the whole life-cycle carbon emissions through a nationally recognised whole life cycle carbon assessment is disproportionate and adds an additional unnecessary burden to the planning process.
- Morrish Homes supports the principle of moving to a low carbon or carbon neutral scenario. However, this should not be at the expense of compromising development viability, or going beyond the already stringent requirements of the Building Regulations.
- EDDC should relax planning rules for small wind turbines to boost renewable energy and reduce reliance on fossil fuels.
- Solar panels should be required on all new builds, including industrial and office buildings.
- The goal of net-zero carbon emissions is unrealistic and unattainable through renewable energy programs.
- Preference should be given to installing solar panels on existing and new buildings, rather than building them on farmland.
- The policy places too much emphasis on prioritizing "renewable energy" especially in regard to battery storage.
- The quest for 'net-zero' is undeliverable and bogus if delivered through 'renewable' energy, the technological production and maintenance of which is a major cause of pollution, fossil fuel use and environmental damage.
- 2040 is far too late. We need action now if we are to prevent human extinction at our own hands. It should be brought forward to 2030 and the term "net zero" should be replaced with "zero carbon".
- Climate change deniers are akin to flat earthers or 18th century slave owners and should not be given a platform.
- What scientific evidence do you have that the climate is in crisis and that justifies declaring a "climate emergency"? What are the costs of implementing Strategic Policy

27? What is the probability that East Devon will become carbon neutral by 2040? Will the carbon emissions be displaced to other parts of the world, e.g. China?

- The policy is too broad. It is important to distinguish between activities which genuinely assist with climate change and others which will fall within this policy but are either adverse or not as beneficial as they might be. It should be more measured and balanced, and less hysterical.
- The support given to maximising opportunities for the delivery of energy storage facilities is supported. However, it remains to be seen how this overarching support will be balanced should schemes for employment development for example propose to apportion some land for this use.
- Policy should include much stricter building requirements to meet renewable energy requirements and require all new buildings to incorporate solar panels or high-quality insulation standards.
- Policy should set numerical limits on actual construction emissions.
- The policy should abandon vanity projects like Seaton Jurassic and Blackdown House and shift investment towards improving the footpath networks, maximising public open space for humans and wildlife, and protecting our countryside from inappropriate housing estates.
- The Local Plan Viability Assessment should allow for an uplift in build costs for delivering net zero embodied carbon.

Policy 29 - Promoting renewables and zero carbon energy

- The Environment Agency support this policy and welcome the requirement for proposals to not have unacceptable impacts on water and biodiversity, and that non-renewable forms of energy generation will only be considered once all alternatives have been exhausted.
- National Farmers Union state Renewable energy has a key role on farm, both in making a business energy resilient in its own right and in some situations also providing energy for wider society. One of the barriers that exists that has limited take up in some situations are limitations in the grid network and although not strictly part of the Local Plan, we would encourage East Devon District Council to do what ever it can to encourage investment here to increase the amount of renewable energy that can be delivered.
- Devon County Council (DCC) suggest adding reference to the document 'A Clean Growth Vision for Development in the West of East Devon'.
- DCC suggest referencing the Devon Carbon Plan that eight times more renewable energy capacity is required in Devon.

- Newton Poppleford and Harpford Parish Council state that the word ‘unacceptable’ is not defined and think that schemes should only be approved with the support of the community.
- Lyme Regis Town Council worry that constraints may limit opportunities for renewable and zero carbon energy generation and would welcome the opportunity for dialogue about the delivery of cross-border community level local generation schemes.
- Hawkchurch Parish Council suggest the benefits of co-location of energy generation and consumers can be promoted by adjusting the wording of Strategic Policy 29. This policy should also include reference to cumulative landscape and visual impact. Specific wording included in representation.
- National Highways endorse the mention of ‘highways’ as a requirement for no unacceptable impacts.
- Agents for Bourne Leisure advise that they welcome the approach in the draft plan to promote renewables and zero carbon energy. In line with the approach taken for residential amenity, draft policies 29, 30 and 31 should be amended to provide adequate amenity protection of other sensitive uses, including visitor accommodation, to ensure that any adverse impacts are mitigated. This would ensure the draft policies are consistent with paragraph 158(b) of the NPPF, which does not restrict the protection of impacts to only residential amenity. The need to protect visitor amenity is crucial given the importance of tourism to East Devon’s economy
- Clyst Honiton Parish Council supports the goals of policies 29-31, but believes that they are not written in a way that is likely to encourage compliance. The exceptions listed in the policies are general requirements for all development, so there is no need to specifically state them in the policies.
- Recommend the words “where there are no unacceptable impacts” are replaced with a more permissive policy which supports renewable energy unless there is “significant and demonstrable harm” to the stated environmental considerations.
- EDDC has approved over 100 acres of solar arrays in Hawkchurch, a stunningly beautiful area with immense landscape and biodiversity value. This has led to concerns about the impact on the area's landscape, biodiversity, and health. Residents should have a say in what developments are acceptable in their area.
- The policy encourages community-led schemes but lacks guidance. EDDC should focusing on community-led schemes to achieve net zero. More examples and guidance would be helpful.
- Protect agricultural land for future food security. Assess Grade 1, 2, and 3a land quality before supporting renewable energy schemes.
- East Devon should be safeguarded from fracking.
- The new energy strategy makes it difficult to get planning permission for renewable energy projects. The strategy requires renewable energy projects to show that there are

no other options available and allows for plenty of scope to object to any zero-carbon or renewable intent.

- Renewable energy is not always zero-carbon. East Devon should support genuine low-carbon developments (such as Small Modular Reactors) in other regions and assess the carbon emissions of all renewable energy proposals.
- Renewable energy is a key part of the solution to climate change, but it needs to be paired with energy storage to ensure that it is reliable and affordable.
- Exmouth Town Council supports zero carbon and renewable energy schemes but wants to clarify the policy wording to ensure that unacceptable impacts are clearly defined. Exmouth Town council also wants to reference geodiversity in the policy and make a strong statement about not supporting fossil fuel driven solutions, unless absolutely necessary.
- The term "unacceptable impacts" has not been clearly defined, which is concerning. There is a risk that this could be interpreted as allowing any development, regardless of its impact on the environment.
- I support solar and wind farms over nuclear energy, which is not green and takes years to dismantle.
- We need to adapt our views on landscapes as they are not static and have changed throughout history. Onshore wind and solar are vital, and if we don't act now, the landscape will change drastically due to climate change.

Policy 30 - Suitable areas for solar energy developments

- The Environment Agency advise that many of the areas shown on maps as suitable for solar development are within areas at risk of flooding. They are satisfied that the requirement for 'no unacceptable impact on water' is sufficient to protect functional floodplains. The nature of solar development means that natural flood management and floodplain improvements can be easily implemented alongside development with little to no negative consequences.
- Woodbury Parish Council state that solar and wind farms are important but should not negatively impact on wildlife or hinder areas of natural beauty.
- National Farmers Union state Renewable energy production is a core part of the NFU's net zero plan and solar projects often offer a good diversification option for farmers. However, there is a need to strike a balance between food security and climate ambitions. It is important that large scale solar farm development is located on lower quality agricultural land or brownfield sites, avoiding the most productive and versatile soils. Utilising roofs and farm buildings for solar should also be incentivised as it delivers a sustainable method of energy production while avoiding any land use conflict and is the NFU's preferred approach.

- The Avenues Residents Association goes further by stating - the NFU clearly identifies that this country should be maximising production of food using existing farming capacity, but that in fact we are already short of production capacity, so clearly sacrificing farming land for solar panels makes no sense, and is both immoral and irresponsible
- National Highways endorse the mention of 'highways' as a requirement for no unacceptable impacts.
- National Highways request additional supporting text to include matters such as visual distraction, glint and glare, icing issues, dazzle and access (including construction traffic) in locations alongside the strategic road network.
- Devon County Council (DCC) feel there should be a more positive approach to domestic generation and energy saving in new builds, existing buildings, and car parks, rather than using high quality farmland which also has adverse landscape impacts.
- DCC recommends adding further detail on landscape impact by having regard to the intrinsic character and beauty of the countryside, located in least environmentally sensitive locations, well designed and integrated into the landscape, enhance landscape character and biodiversity. Add reference to Devon Landscape Policy Group Advice Note 2.
- Summerfield Planning Ltd on behalf of landowner state there is no intention to use site Clge_18 for solar development so it should be removed from the Policies map.
- Support identifying permissible sites for solar energy to tackle climate change and to make energy cheaper – must call for land to identify sites.
- Exmouth Community Associations advise - we strongly object to the proposal that areas on the very edge of Exmouth are suitable for solar energy production, especially the Maer Valley which our Neighbourhood Plan earmarks for the creation of a Valley Park.
- Barratt Homes considers that the areas identified should not be prohibited from delivering other types of development.
- Recommend the words "where there are no unacceptable impacts" are replaced with a more permissive policy which supports renewable energy unless there is "significant and demonstrable harm" to the stated environmental considerations.
- The National Trust support policy in principle but is concerned with the extent of the district which has been identified as 'Areas considered suitable for solar energy' as set out on the policies maps. Concern is raised around not taking into account listed buildings or their settings, noting that policy wording changes could be appropriate. Policy changes should reflect to importance of heritage assets and their setting noting adverse impacts that solar farms can have.
- All new builds should come with solar panels, greywater systems while avoiding fossil fuels for heating. This would reduce the impact of new homes on the environment, reduce our reliance on fossil fuels and make homes more efficient to run. I would like to see more homes built to the Passivhaus levels of efficiency.

- Post-build monitoring and enforcement: The council should set up a timetable and methodology for independent monitoring of new developments to ensure that they meet the net-zero carbon goals. The council should also have an explicit program of immediate action if the goals are not met.
- there is no evidence that a proposed 'whole life cycle carbon assessment' will take on board the full impact of the rare minerals and metals required to produce solar panels and wind turbines and the battery energy storage referred to in 27.
- Whole life cycle carbon emissions should also apply to policies in this section relating to solar, wind and storage.
- The Devon Carbon Plan says that local authorities should gather and keep information as a local evidence base, which will help demonstrate that it is financially viable to build net-zero carbon homes.
- The strategy of building net-zero carbon homes is an absolute necessity, as it helps in keeping energy costs down, making present and future resources more cheaply available, and will result in a subsequent reduced dependency on climate damaging fossil fuel extraction and burning.
- New connection to the gas grid must be stopped.
- The principle of moving to a low carbon industry is supported, but it should not be at the expense of compromising development viability or going beyond the already stringent requirements of the Building Regulations.
- Strongvox Ltd believes that the policy of requiring all new residential and commercial development to be net-zero carbon emissions is unsound. They argue that the policy is not realistic or achievable, and that it would add an unnecessary burden to the planning process. They recommend that the policy be stepped in line with government targets and requirements, or that it be deleted altogether.
- Morrish Homes supports the principle of moving to a low-carbon or carbon-neutral scenario, but not if it compromises development viability or goes beyond the Building Regulations. They believe the policy is unsound and should be amended to clarify that carbon-neutral development should be an aspiration, not an absolute requirement.
- Exmouth Town Council supports the policy of maximizing opportunities for renewable energy in new residential development. However, they have concerns about the clarity of the policy and the potential implications for air-conditioning installations. Specifically, they are concerned that the policy does not specify whether it applies to all new residential development or only development sites above a certain size. They are also concerned that the policy does not define what is meant by "maximizing opportunities" for renewable energy, and that it does not clarify whether air-conditioning installations are allowed.
- Islandwide Limited supports the principle of moving to a low-carbon or carbon-neutral scenario, but they believe that the policy is unsound because it could make development unviable and go beyond the requirements of the Building Regulations.

They propose that the policy be amended to clarify that carbon-neutral development should be an aspiration, not an absolute requirement.

- The local plan feels like a developer-led plan, which is a concern because developers are motivated by profit and may not be willing to invest in net-zero housing. EDDC should take control of the plan and require developers to build to Passivhaus standards, which would make homes more energy-efficient and reduce carbon emissions.
- This is political nonsense and has no place on a formal consultation.
- Net-zero carbon, and biodiversity-sustaining credentials should be the baseline consideration for all new development. Buildings need to be put in place that are net-zero carbon, and to take opportunities for energy schemes.
- There is a lack of good examples of net-zero development. The council should provide examples of net-zero development so that developers can see what is possible.
- There should be an explicit statement on environmental standards. The council should make it clear that all new houses must meet minimum environmental standards, such as having solar panels and EV chargers.
- EDDC needs to have the power to ensure that developers comply with the policy's requirements and to be strict monitoring of developers to ensure that they meet net zero carbon emissions.
- Net-zero development should be more affordable, such as providing financial incentives to developers.
- The policy should not include air conditioning. Air conditioning is a major source of carbon emissions, and it should not be included in the policy.
- Policy 30 should be ambitious and should not be afraid to set high standards. EDDC should be willing to take a leadership role in the fight against climate change.
- The idea of zero carbon is unrealistic, as all life on Earth is carbon-based
- More emphasis needs to be added to being British Made.
- EDDC should mandate a high and objectively quantifiable level of certification for both building and performance, as well as enforcing the overall net-zero requirement. The council should not allow developers to sidestep high performance building standards by adding solar panels to offset a house's poor performance.
- East Devon's solar policy is harming the local economy and environment. Solar farms on farmland are unsightly, reduce crop yields, and make it difficult to access land for grazing or other agricultural activities. Solar farms should be built on developed land instead, where they can help to reduce the amount of energy that is imported from other countries and create jobs in the local area.
- To ensure a sustainable future, we must invest in renewable energy sources such as wind and solar power. These sources are clean, abundant, and reliable, and they will help us to reduce our reliance on fossil fuels.
- The allocation of land for solar power has not been properly considered. Land that is adjacent to existing homes, north-facing, forested, or shaded should not be considered

as suitable. Some land must be reserved for food production, environmental benefit, and amenity use. Land adjacent to Ridgeway in Colyton should be excluded as it would increase flooding risks for the town.

- The policy should promote the use of commercial rooftops for solar energy generation, such as the installation of solar panels on warehouse roofs.
- Solar farms can increase biodiversity by planting wildflowers, hedgerows, and trees. Developers should include these measures in planning applications and ensure they are implemented and maintained.
- Exmouth Town Council Members have concerns about the solar policy map, which shows all permissible areas instead of restricted areas. They also feel that the policy should reference domestic uses of solar energy, such as water heating and solar thermal.
- This policy is not included on the policies map.
- The policy map designates a vast area of East Devon as suitable for solar energy, but this is too broad. A more targeted approach is needed, eliminating areas near settlements or in highly visible locations.

Policy 31 - Suitable areas for wind energy developments

- Woodbury Parish Council state that solar and wind farms are important but should not negatively impact on wildlife or hinder areas of natural beauty.
- National Farmers Union believe that the recent policies on wind development and what is currently proposed in the emerging Local Plan is too restrictive and skewed towards the concept of 'large scale wind farms. The Low Carbon Study has made this same mistake and only mapped areas suitable for 500kW and above. Recent reports, such as the Devon Carbon Plan show an acceptance of wind by the public and it is important planning policy catches up with this.
- There is a clear role and ability for farm businesses to install small turbines (20-50kW) and with the wind speeds in many areas could easily contribute 50,000kWh/year. This, when combined with solar could make a farm businesses energy independent, not only helping to secure its financial future, but also taking pressure off the grid and at certain times allowing it to provide energy back to the grid (where grid infrastructure allows). We accept the concern and need for 'large on shore wind farms' to be controlled
- Hawkchurch Parish Council suggest the following rewording 'Landscape, visual or residential amenity (including cumulative landscape and visual impacts);'
- National Highways endorse the mention of 'highways' as a requirement for no unacceptable impacts.

- National Highways request additional supporting text to include matters such as visual distraction, glint and glare, icing issues, dazzle and access (including construction traffic) in locations alongside the strategic road network.
- Devon County Council suggest removing “where landscape sensitivity has been identified as being low/moderate/moderate” as this depends upon the size and number of turbines and refine the suitable areas using a landscape sensitivity assessment approach.
- Support identifying permissible sites for wind energy to tackle climate change and to make energy cheaper – must call for land to identify sites.
- For clients Greenslade Taylor Hunt advise the use of energy storage facilities is encouraged. However, the binary approach to not permit this development where it is in direct conflict with any policy in the plan that allocates land for a different specified use is not sound. There needs to be leniency written into the policy to allow energy storage on sites that have been allocated for other uses
- Buckerell Parish Council are concerned that identifying land suitable for solar development indicates a presumption in favour of such development. The area of search should be replaced by a criteria-based policy especially relating to sensitive landscape areas/important views
- Exmouth Town Council Members support the policy, but they believe that it should also mention the potential for micro and domestic wind turbines, as well as offshore wind energy.
- Policies that allow domestic wind turbines to be built on all domestic dwellings should be encouraged.
- Wind energy and solar power should be concentrated in areas like Exeter Airport, which is a loss-making, polluting site with a large amount of unused land. This would free up green belt land for other uses and create a more sustainable future.
- Wind farms and solar panels are unlikely to be welcome in most parts of our district, especially within AONB
- It is essential to educate communities about how the visual impact of wind and solar infrastructure is a minor cost when compared to the benefits of helping to address climate change.
- Onshore wind energy will have to play a part in electricity generation, even though it has some drawbacks. The climate emergency requires emergency measures, which may have impacts on landscape and visual amenity. People's concerns about their visual impact should be secondary to the urgency of the situation.
- The policy could be more supportive of onshore wind energy development. We should expand the definition of "suitable areas" and make it easier to develop wind farms, except in cases where there are strong environmental or other concerns.
- The environmental cost of wind turbines is significant. Each turbine requires 900 tons of steel, 2,500 tons of concrete, and 45 tons of non-recyclable plastic to build. They have a

lifetime of only 25 years and need up to 700 gallons of oil for their gears and hydraulic systems, which must be replaced every year. Wind turbines are also a threat to wildlife, with some studies estimating that they kill up to 300,000 birds each year.

- I am pleased to learn that wind turbine blades can now be recycled. This is a significant step forward in the sustainability of wind energy.
- Support wind turbines on farmland as long as they do not harm agricultural production.
- I understand that these statements are general, but I cannot fully support them without more details. For example, what about innovative new products like home-efficient small wind turbines for individual houses?
- Wind energy developments may increase carbon emissions overall if not assessed carefully. All wind energy developments should have a whole life-cycle assessment and the full support of the local community.
- Supports relaxing planning regulations for domestic wind power generation, it would be easier for people to generate their own power and that there are new turbines available that are safe for birds and wildlife. The cost of installing and connecting wind turbines to the national grid has decreased significantly over time.
- There is evidence that wind turbines can be noisy, and that people living close to them can find the noise intolerable. This should be taken into account when granting planning permission for wind farms.
- Wind energy is essential, and as we are a coastal region, it is possible to site wind farms offshore.
- The policy should set clear and specific targets for wind energy generation, both in the short term and long term.
- Land grades of 3b should be excluded from wind farm development, and that materials for wind farms should be designed and manufactured in the UK or Europe.
- Wind energy has been criticised for its impact on the landscape, visual amenity, and residential areas. Some people argue that wind energy is not a reliable source of energy because it is intermittent and cannot store surpluses.
- EDDC should identify areas where new wind turbines would be acceptable to local residents, taking into account the benefits of local generation for farms, communities, and new developments. They should also encourage farms to install their own wind turbines and it should not be audible from housing areas.
- The policy does not include provisions for the decommissioning of wind farms, the reuse of land after wind turbines removed and the visual impact of wind farms.

Policy 32 - Energy Storage

- Newton Poppleford and Harpford Parish Council think that every new development should have the facility to produce and store energy.

- Hawkchurch Parish Council suggest the following rewording ‘Landscape, visual or residential amenity **(including cumulative landscape and visual impacts)**;
- Hawkchurch Parish Council suggest that Policy 32 be completely revised to bring it into alignment with the other energy policies and to conform with the NPPF and national guidance. The PC have also taken note of the way other local plans have been drawn up to safeguard communities and have considered the recent advice from the Fire Service regarding the Wadbrook battery storage proposed development. Suggested wording included in representation.
- Devon County Council welcome this policy – add reference to economic opportunities highlighted in ‘A Clean Growth Vision for Development in the West of East Devon’.
- Exmouth Town Council Members are supportive of this policy and believe that due to the cutting-edge nature of battery and smart systems, flexibility is needed to support technological advances as they come forward.
- Clyst Honiton Parish Council believes that restricting the use of such storage facilities to just East Devon could be seen as not complying with the Duty to Cooperate. It could also be difficult to prove or enforce.
- The BESS is a new technology which EDDC failed to understand its dangers, such developments will be harmful for the environment, landscape and residents.
- Concern about the potential risks of energy storage facilities, such as noise pollution, fire hazards, and environmental impacts. They believe that these facilities should not be permitted, and that the policy should be rewritten to reflect the risks
- The current policy on energy storage facilities is too restrictive. It should be amended to allow energy storage on sites allocated for other uses, where appropriate. Energy storage facilities can be compatible with other forms of development, such as employment or residential uses.
- Land grades of 3b should be excluded from the policy, even if this is not currently required by the NPPF. This is because land of this grade is more prone to fire, which could lead to significant damage to the environment and the surrounding area. In addition, there should be careful consideration of the proximity of appropriate firefighting resources and trained staff to any proposed development on land of this grade.
- Battery storage materials have a number of ethical, environmental, and economic challenges. The mining of battery materials can have a negative impact on the environment and the communities that live near mines. The production of batteries also requires a significant amount of energy, which can contribute to climate change. Batteries have a limited lifetime, which means that they eventually need to be disposed of, which can also have environmental impacts.
- EDDC can help kickstart a drive for more households to install solar panels and energy storage by providing financial incentives, educating the public about the benefits, making it easier to install, and partnering with local solar installers.

Policy 33 - Heat Networks

- Further clarity is required on existing and proposed heat networks within the district in addition to the operation of such networks and connectivity requirements. The policy as worded provides the onus on developers to achieve a connection in order to secure planning permission and it offers no flexibility in considering whether a connection is feasible on a site-by-site basis. The policy in its final wording should allow flexibility. The Council should also consider whether its strategy for district heat networks is consistent with its goals for net zero carbon given that often district heat networks are reliant on gas as the most viable option.
- Agents for Bloor Hones support policy but consider policy should reflect the fact that networks should not be gas based and recognition is given of very low heat demands of new homes meaning most new networks be non-viable.
- Exmouth Town Council members generally support the policy on heat networks, but they believe it needs to be strengthened in several areas. They want to ensure that heat networks use renewable energy, are well maintained, and are linked to the Energy Security Bill. They also want more clarity on how the threshold of 1200 homes was established.
- Clyst Honiton Parish Council suggests that heat networks must be powered by green energy only. The Cranbrook system uses carbon fuel, which should not be allowed under this plan. It is not acceptable to expect householders in the future to sign up to and pay for a heating network that they do not see as green.
- Developers assumes no heat network would be required as below policy threshold of 1,200 dwellings.
- Cranbrook Town Council is concerned about the resilience of the district heating system in Cranbrook. Cranbrook TC notes that the district heating system has failed every winter in recent years, and that the most recent failure was due to widespread valve failures in individual HIUs (Heating Interface Units). Town Council is also concerned that Eon, the operator of the district heating system, does not have the resources to respond to failures. As a result, residents have been left without heat and hot water for several days.
- Cranbrook TC is concerned that the draft local plan includes a requirement to connect to district heating where development is within 1 km of an existing network. The Town Council believes that this requirement should be revised to address the concerns about the resilience of the district heating system. Specifically, the council recommends that:
 - Cranbrook Town Council be a party to any contractual agreements for district heating so that it can exercise due control as a planning authority.
 - The strategic requirement in Strategy 33 be fully supported with operational resilience and the capacity to respond to system failures.

- Cranbrook Town Council work with Eon to improve the resilience of the district heating system and ensure that residents can report failures easily and quickly.
- Cranbrook Town Council provide financial assistance to residents who are affected by district heating failures.

- Change policy to clarify that commercial floorspace requirement relates to B1 use only, and that applicants should investigate the potential for heat networks as opposed to being strictly required to provide them.
- Central generation of heat should be more efficient than generation in individual buildings. This is because large central boilers can be more efficient than small individual boilers. However, this only works if it is economic for both the building occupiers and the heat generation organisation.
- It is better to have Passiv Haus standard homes as not much heat is needed in the first place.
- Cranbrook is a town in the UK that has a district heating network. The network has been plagued by problems, including a single supplier, high prices and poor reliability. This has led some people to question the value of district heating networks.
- Home Builders Federation highlights that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. This may mean that it is more sustainable and more appropriate for developments to utilise other forms of energy provision, and this may need to be considered.
- Home Builders Federation draws attention to Government consultation on Heat Network Zoning which identifies exemptions to proposals for requirements for connections to heat networks
- Housebuilders should have the freedom to choose whether to connect to a heat network. If they can meet the other objectives without connecting, there is no benefit to forcing them to do so.
- District heating networks are a better alternative to individual gas boilers, but they are not a long-term solution. We should focus on building houses that are more energy efficient and rely less on external power.
- Energy-from-waste schemes need to be considered.
- A comprehensive assessment of the carbon emissions associated with heat networks throughout their entire lifespan is required for all proposals.
- The requirement for properties to connect to heat networks may not comply with Building Regulations, may not be more sustainable than microgeneration sources, and may be contrary to competition law.
- The policy must be properly assessed in the upcoming viability assessment, which must also include a thorough assessment of the viability of older person's housing.

Policy 34 - Embodied carbon

- Retaining 'at least' the foundations should be deleted as foundations of older properties wouldn't be acceptable for modern building regulations – amend to "retain existing buildings unless refurbishment is either unviable or impractical".
- McCarthy Stone is concerned that the proposed embodied carbon policy could make it unviable to develop specialist older persons' housing. They argue that the policy should be flexible enough to allow for sustainable development and be properly assessed in the forthcoming viability assessment. They also recommend that the viability assessment should include a proper assessment of the viability of older persons' housing.
- Exmouth Town Council Members support new policy on embodied carbon but worry about training implications and lack of mention of recycling.
- EDAL supports the objective of the policy to reduce embodied carbon but believes that the second part of the policy is unduly onerous and conflicts with the first part. The policy should be revised to refer to viability and practicality in terms of the reuse of existing buildings, and indeed in demonstrating net-zero lifecycle emission.
- Clyst Honiton Parish Council agreed in principle.
- New housing development should be more sustainable and tightly regulated to avoid repeating past mistakes.
- Home Builders Federation considers that this policy does not serve a clear purpose and it is not evident how a decision maker should react to development proposals, particularly in relation to how a reduction in embodied carbon is considered.
- This policy is an example of excessive environmentalism and should be dropped. We should rely on the discretion of our planning team to assess each application on its merits.
- The retention of foundations prevents self-builders from claiming zero-rated VAT. This may be an oversight or a deliberate policy to increase costs.
- Exmouth has lost many historical buildings due to neglect. Owners of vacant properties should be made to maintain them or have them compulsorily purchased.
- Planning requirements should include cement-free construction to reduce environmental impact.
- The policy is a good start, but it needs to go further. We need to build houses that last for centuries, not decades. This will reduce carbon emissions and waste.
- The destruction of forests and the concreting of large swathes of land will release vast amounts of carbon into the atmosphere, accelerating global warming.

Policy 35 - Flooding

- The Environment Agency suggest that paragraph 7.33 should be clear that development in areas of flood risk, in addition to a Strategic Flood Risk Assessment Level 2, need to meet the sequential test and here necessary the exception test in accordance with the NPPF.
- The Environment Agency note that this is an interim draft policy highlighting the issues likely to be covered in advance of the SFRA being completed. Their comments focus on what the new flooding policy should address, including adding:
 - Delivering developments and communities which are resistant and resilient to future floods.
 - When it will be expected that development helps to reduce flood risk overall.
 - Tighter standards for development within Critical Drainage Areas (CDA).
 - Where use of natural flood management (with associated BNG opportunities) would be appropriate for land further up a catchment from communities at risk of flooding.
 - Daylighting of culverts within sites and buffers of at least 8m from watercourses which are free of development.
 - Making space for flood defence mitigations and relocation of unsustainable communities.
- The Environment Agency recommend that in the fifth bullet point regarding run-off rates 'preferably' is removed. The expectation is that SuDS is implemented on all sites to provide betterment wherever possible, in all locations not just in CDAs.
- The Environment Agency note that Critical Drainage Areas are only referred to in the draft plan in relation to the Clyst Valley Regional Park. They are in the process of reviewing and renewing the CDAs and will seek to ensure these included in the plan if there are any updates for East Devon.
- The Environment Agency note that Natural Flood Management (NFM) is listed in the glossary but not actually mentioned within the local plan. There is NFM work ongoing or planned within East Devon and the plan offers an opportunity for new development to contribute to future NFM projects as part of schemes to reduce flood risk and/or achieve BNG.
- Natural England advise that the policy should include reference to the importance of SuDS in managing the flood and pollution risks resulting from urban runoff.
- South West Water would like policies to promote flood protection measures such as sealable airbricks.
- South West Water advocate the slow dispersal of surface water combining SuDS with green infrastructure.

- Devon County Council support this policy but suggest further detail on water quality and water re-use.
- Exmouth Town Council agree with the policy but are concerned that the sequential test jeopardises development in the town centre.
- Newton Poppleford and Harpford Parish Council does not support any development on land at risk of flooding.
- Clyst Honiton Parish Council suggests that sequential testing should be done before land is allocated in the Local Plan to ensure that only sites with lower flood risk are developed. They also propose rainwater storage for toilet flushing and other uses, as well as dredging of the rivers Exe and Clyst to reduce flooding.
- Several respondents thought this was a good policy.
- Flood risks likely to increase.
- Should consider nature based solutions to flood management.
- Natural flood management and SUDs on estates would be good.
- Climate change will bring more droughts limiting access to water.
- Broadly in agreement but don't agree with any building on land at risk of flooding.
- Strengthen policy to meet NPPF, avoid land needed for flood management, account for climate change, respect character and biodiversity, reduce run off and manage water holding habitat measures.
- Happy with policy but concerned that many allocations are close to rivers.
- Should consider disruption of drainage and natural carbon sink of deep soils and how development disrupts this.
- Should require planting in flood prone catchments to reduce run-off and increase infiltration.
- Concerned that policy will have no teeth and that the Environment Agency is often ignored.
- Many respondents raised concerns about the flood risk caused by solar farms, particularly run-off.
- Several respondents noted that surface water flooding is a serious problem in East Devon.
- Surface water flooding should be shown on maps.
- Concern about the lack of certainty of future flooding and if people don't take notice of the experts will compensation be given to those whose homes are flooded?
- A few respondents suggested planting more trees.
- Include beavers in the policy because they are part of the solution.
- Large green areas should be retained to act as sink to capture flash floods.
- Permission should only be granted where SUDs are required.
- Developers must address water management from the outset.
- Should be no building below sea level or close to floodable rivers.

- Should make clear that sequential test requirements on allocated sites have been undertaken.
- Should already have been done so homes could be insured.
- Needs to be applied to new developments.
- Do more to stop non-porous surfaces in urban areas.
- Greywater should be used for toilet flushing and surface water separated from sewage.
- Flooding is just a river following its winter channel.
- Seaton Tesco and surrounding housing?
- Policy should be more specific so that land needed for flood management is totally off limits.
- Please enforce this policy.
- Households should have rainwater storage tank.
- Policy incompatible with plans to build on 251 hectares of farmland in area already subject to surface water flooding and sewage overflows.
- Areas at risk of flooding are opportunities for biodiversity net gain and other green spaces.
- Policy is unnecessary as it just duplicates NPPF and PPG, contrary to NPPF para 16f.
- Good in theory but permissions have been granted in flood plains despite Environment Agency advice.
- Lower Otter Restoration Project has increased flood risk.
- Although building in areas at risk of flooding should be avoided, sometimes mitigation is possible.

Paragraph 7.35 - Water quality and supply

- The Environment Agency advise that the plan is more definite and require that the results of the Water Cycle Study will feed into site allocations and inform the distribution strategy.
- The Environment Agency suggest that other water quality issues should be acknowledged in the plan, including:
 - Detailing how development will protect and where possible improve the 8 bathing waters in East Devon,
 - How development will protect and where possible improve the Exe Estuary and Outer Exe shellfish waters, which are known to be affected by activities and operations in Exmouth and other urban areas.
 - The cumulative impacts on water quality of development within East Devon and other local authority areas draining to the same catchments. The cumulative scale of housing growth planned by East Devon, Exeter City and Mid Devon mean that

existing pressures on the water environment will be exacerbated. The plan therefore needs to be clear about how development will not cause a deterioration in these waterbodies and help secure improvements instead.

- The Environment Agency advise that there will be increased pressure on water supply from a growing population and hotter drier summers predicted due to climate change. They assume that the housing and economic developments envisaged in the plan will primarily connect to the public water supply and so the water for these will be managed through South West Water's (SWW) Water Resources Management Planning and the longer term Regional Water Resources plan up to 2050. However, where a development needs a water supply which is not provided by SWW (e.g. an onsite borehole or surface abstraction) an environmental permit may be required. The Agency are involved in wider, strategic discussions with SWW in relation to resilience and maintaining a secure supply of water for the future. As a result of the trend towards staycations over the last two years due to the Covid19 pandemic, SWW reported unprecedented water demand in the Mid to East Devon areas during the holiday period. This increase in demand combined with the hot dry weather experienced in the Summer of 2022 and the drier than normal Autumn that followed has put strain on the water supply infrastructure and sources used for abstraction. This is a foretaste of the pressures that are likely to be felt in the future regarding water supply as we experience more of the effects of climate change. Under climate change scenarios up to 2050, the Devon, Cornwall & Isles of Scilly area is modelled to potentially be impacted by much lower summer flows due to lower rainfall. It will be essential for public authorities to work with the water company and other abstraction licence holders to mitigate for and adapt to these changes. In light of the evidence of emerging trends towards water being an increasingly scarce resource, the Environment Agency strongly encourage the plan to include a policy requiring all new developments to demonstrate water efficiency, including grey and rainwater recycling, especially on major developments. In line with guidance, all new residential units shall demonstrate compliance with the more water efficient maximum use of 110 litres per person per day in line with Building Regulations approved document G, to be secured by planning condition.
- South West Water proposes policy wording to reduce flood events eroding soil and strengthening disposal of surface water on site.
- Lyme Regis Town Council support measures to specifically improve water quality in the river Lym and note the negative impact that relatively poor water quality is currently having on bathing water quality at Lyme Regis.
- The National Trust is supportive of the aims of this policy, however, considers that the policy wording should be strengthened from wording for policy requirements such as 'preferably' and 'ensure' to 'development must...' or other similarly robust wording.

- Clyst Hydon parish council is concerned that the EDDC local plan does not address water management issues. The plan does not mention how the increase in population will be accommodated within the water cycle, how the extra sewage requirements will be coped with, and where the extra water supply will come from.

Policy 36 - Coastal change management areas (CCMAs)

- The Environment Agency are pleased to see multiple policies relating to coastal change reflecting the good work that has been undertaken to understand and identify the areas that will be at most risk. They are fully supportive of Policy 36 which establishes CCMAs for East Devon and sets out policy on how new proposals within them will be considered. The policy is robust and unambiguous; they especially welcome the strong position that residential development (including changes of use) will not be permitted in CCMAs and that all other permissions will be time limited.
- Natural England Natural England supports policy and the designation of Coastal Change Management Areas as a key coastal planning tool. Sea level rise and coastal change are inevitable and bring both challenges and opportunities for people and nature. They consider the approach used and the methodology produced (policy justification 7.37) as clear, concise, and scientifically robust and would also highlight it as best practice for an evidence base for Local Planning Authorities to demarcate and designate their CCMA's
- Pleased to see managed retreat and sustainable community planning in this policy – cannot hold back the sea indefinitely.
- Several respondents considered it a good policy approach.
- Agree with policy but requires careful management.
- Agree new developments should be banned but should not restrict changes to existing buildings.
- Will have to concede land to the sea as sea levels rise.
- 'Get on with it please, we are already 20 years behind'.
- Economic and social benefits should not outweigh environmental considerations.
- Need explicit constraints on huts, cafes, carparks and caravan/camping sites.
- Community and environmental benefits should be secured for temporary modifications to existing commercial facilities.
- Coastal areas need to be conserved for landscape and amenity – important for tourism and employment.
- Blanket ban on development fails to take account of many different situations residents may encounter and more consideration and detail is needed.
- Not based on best available evidence in accordance with NPPF.
- Does not include margins of error in mapping contrary to normal practice.

- Whilst policy 36 is consistent with NPPF (paras 172 and 173) they are not appropriate because they are not supported by best available evidence.
- No provision to account for future coastal defence schemes that would reduce size of CCMA.
- Policy relies on computer models and should have reality checks.
- No case for restricting planning permission as should be judged on their own merits.
- Not sure policy based on best advice.
- 'Temporary' caravan sites need to be controlled to protect the beauty of coastal areas.
- Unsure if policy means that coastal erosion will be accepted.
- Sea level rises should be predicted in conjunction with flood risk – current road drainage cannot cope.
- Support Plymouth University involvement but more environmental impact assessors should be deployed to verify decisions.
- A few representors commented that the plan should be flexible when new information becomes available.
- Ban on new homes disproportionate to the threat and property owners should be allowed to take the risk.
- Criticism of lack of justification for prohibiting new building and conversions in the CCMA.
- Proposals not in best interests of residents and businesses.
- The sea level will rise and there are models to predict this that should be used at the front of the planning process and not as an add on.
- A couple of respondents raised concerns about projections of erosion beyond 20 years as there is too much uncertainty.
- Conversely, one representor thought it was a sensible precautionary approach and another thought it not sustainable to think in terms of less than 50 years for mitigation and adaptation.
- Property owners should be allowed to make their own decisions at their own risk providing that they do not affect other coastal areas.
- Planning permission is still given for coastal schemes.
- The South West Coastal Path needs to be maintained as it moves inward with erosion.
- The National Trust is supportive of this policy which is generally consistent with our own coastal policies/strategy. The opening statement for the policy clearly sets out the aims. In relation to the second bullet point, the policy wording could be strengthened further to set out that developers 'must demonstrate that they require a coastal location' or 'providing they absolutely require a coastal location.'

Comments relevant to Budleigh Salterton

- The Lower Otter Restoration Project already brings the coast close to residential homes

Comments relevant to Exmouth

- Exmouth Town Council supportive of policy but note it will have limited impact on Exmouth.
- Coastal plains in Exmouth should not be built on – previously floodplain.
- Good in theory, but don't want Devon Cliffs moving further back into the Maer Valley – already difficult for local community to access the beach.
- Agents for Bourne Leisure advise that parts of Devon Cliffs Holiday Park are located within the proposed CCMAa but it is considered that there are ways to more actively plan for changes within the coastal zone, particularly in relation to existing holiday parks. Bullet 1 of the draft policy helpfully provides a sensible risk-based approach to uses within the 0-20 year time horizon. We suggest that temporary static caravan pitches should also be allowed within this horizon. This would allow benefits associated with additional temporary holiday accommodation to be realised, whilst recognising the ability for static caravans to be removed or repositioned relatively quickly. Bourne Leisure also requests that 'tourism uses' are included within the second bullet point of draft Policy 36. Commercial development does not typically cover tourist uses and, as tourist uses are typically situated in coastal locations, it is important, for the avoidance of doubt, that the replacement, relocation and adaptation of other such uses at risk of coastal erosion are explicitly permitted within the emerging Policy.

Comments relevant to Sidmouth

- Welcome focus on coastal erosion but evidence for Policy 36 is too narrow and significantly different to Sidmouth Beach Management Plan.
- CCMA 100 year recession line is 6 times further in land than Beach Management Plan.
- Many representators commented that the CCMA map at Sidmouth not based on best available evidence and risks blighting many properties.
- Several respondents commented that the Plymouth University work was a nationwide study and not specific to Sidmouth.
- Will petrify an attractive 'green lung' based on general data from the University of Plymouth when EDDC has Sidmouth specific data.
- Plymouth study does not take local factors into account.
- Should wait for 5 years to see how sea defence works change erosion rates.

- Many respondents felt that the CCMA designated does not take account of Beach Management Plan works.
- Challenge not being able to make alterations to properties.
- Opposed because would blight both properties and town as a whole.
- Economic impact report should be provided.
- Several respondents expressed concern about property blight.
- Class action could be taken against the Council for property devaluation due to negligence.
- Why is a more dramatic study than the Beach Management Plan being used for the local plan?
- Large part of town would be abandoned on spurious evidence.
- Plymouth approach is experimental.
- Devon County Council rebuilt the Alma bridge on the basis that it had a life expectancy of at least 50 years.
- More accurate erosion rate should be calculated.
- Accelerated cliff erosion caused by previous sea defences and canalisation of River Sid preventing recharging of protective shingle by natural means.
- The over steep cliff formation cannot be seen as a natural process that should be allowed to continue unchecked so the Beach Management Plan needs to be implemented to return the erosion of the cliff to a natural level.
- Even if Beach Management Plan is abandoned it should be for owner to decide if they want to take financial risk of building.
- Erosion rates will be much slower once the Beach Management Plan is implemented.
- This doomsday scenario must be challenged.
- Mid point between Plymouth University and Beach Management Plan erosion line should be used.

Policy 37 - Relocation of uses affected by coastal change

- The Environment Agency welcome this policy but are concerned that no provision has been made to allocate land for existing uses to relocate to and without a mechanism in place to provide land and/or compensation it is not clear how functional this policy will be. As a minimum the plan should ensure that space is available for homes, businesses, facilities, infrastructure and habitats to relocate to.
- Natural England advise - In addition to built assets, this policy should also provide for the relocation of valued environmental assets away from areas of risk, with the provision of rollback of European protected sites and SSSIs, where the effects of sea level rise and coastal squeeze will cause condition to decline.
- A few respondents agree with policy.

- Acceptable in principle but detail will need to be considered on a case by case basis.
- Policy is appropriate but unlikely to be used.
- Policy should only be used when alternatives exhausted and like for like.
- Should not be misused to allow development on otherwise unsuitable land.
- Doesn't take account of local data.
- Should be no development within 2 metres of the coast.
- Predictions are not robust evidence, but continuing trends could be.
- Where property owners have offered to pay for defences and been refused the council should pay compensation for any losses.
- Exmouth Town Council agree with principle but concerned it will offer disproportionate protection for holiday accommodation sites.
- Better to clear sites than make local community responsible for dangerous structures.
- Support relocation rather than spending a lot of public money protecting a few properties.
- Supported for homes but now to allow holiday site to expand inland.
- Support relocating residents in their own community but not at expense of biodiversity.
- Agents for Bourne Leisure consider that tourism uses should be included in policy wording to allow for relocation of losses and as such to ensure that there is continued and ongoing investment in such facilities in East Devon, and so that the benefits to the local economy. They consider the amendments should be made as large sites need a phased period relocation period (3 months is too short). Bourne Leisure strongly objects to point 5 of Policy 37 and requests that this point is removed from the emerging policy. Tourism development, by its nature, is often located beyond settlement boundaries, and requiring relocated uses affected by coastal change to be consistent with the criteria set out in Policy 7 (Development beyond settlement boundaries), would be overly restrictive

Policy 38 - Development affecting coastal erosion

- A number of respondents support the policy.
- Correct balance need to be struck between allowing natural processes on undeveloped coast and protecting people.
- Exmouth Town Council think the policy is acceptable and the statement about the protection of the Jurassic Coast bold.
- Not all coastal erosion is natural and may have man made cause that needs to be taken into account.
- A problem created by man made interventions in Sidmouth should not then be treated as a natural process that carries equal weight with protecting coastal communities with all people being involved in making decisions.

- Natural coastal erosion must be allowed to happen – sea defences either fail or have an impact elsewhere.
- Need to conserve coastal areas for landscape and amenity which helps tourism and local employment.
- Should be strategic policy.
- Should reference vegetation helping to consolidate land.
- Should address on site by site basis.
- Changes over past 20 years caused by the like of English Heritage and the National Trust, who should be made to pay.
- Properties should be protected.
- Wooden breakwaters should be considered.
- Defences should be provided and houses not allowed to fall into the sea.
- Concern about cost to tax payer.
- Policy seems to imply natural processes that created the attractive landscape should continue unless there is a cost.
- Difficult to protect from natural process forever.
- Not right to use the Shoreline Management Plan here but disregard it elsewhere in plan.

Chapter 7 - Policy omissions from - Tackling the climate emergency and responding to climate change

- Need to consider river pollution.
- Natural England, in referencing paragraph 7.45 - Links to marine planning – advise - Links to marine planning could reference that developments impacting the intertidal environment may require a licence from the Marine Management Organisation (MMO). Natural England would recommend that East Devon District Council adopts the Coastal Concordat [A coastal concordat for England \(revised: December 2019\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/431112/A_coastal_concordat_for_England_revised_December_2019.pdf) for England to streamline decision-making in the coastal environment.

Chapter 8 - Meeting housing needs for all

Overarching comments

- Some developers challenge the suite of housing need policies.
 - The ability for the vision, homes and jobs to be delivered must be central to the setting of Local Plan policy but they do not consider this is the case. The Plan's approach, viewed as a whole, is in grave danger of impacting negatively on delivery of housing.
 - The plan almost completely relies on the private sector to deliver the plan aims/objectives but the endless ratcheting up of policy requirements will kill the goose that lays the golden eggs. This will be to no one's benefit. For my client to build 40 of the dwellings he wishes to build, he has to, according to draft policy, find land for 100 dwellings with sufficient additional land to provide the aspirational 20% BNG and also some employment land, which may or may not relate to any market demand.
- One respondent commented that this section is too prescriptive. The LPA must have control but should put the Councils/national Vision as the driving force, which can get lost with multiple sub points in each policy. Recognise that the world in 10 years will be very different to now. Questions whether a more prescriptive policy will remain fit for purpose
- Keep exceptions to a minimum to avoid abuse of policies.
- Another wants coherent strategic thinking that addresses specific housing need in rural areas and the climate change crisis at the same time
- The East Devon AONB team note that AONB's are included as part of a designated rural area for the purposes of locating affordable housing, and suggest that even if there is a proven need for affordable housing it should meet NPPF 177 if required, be located and designed to respect the aims and purposes of the AONB designation and include an appropriate LVIA.

Policy 39 - Housing to address needs

- Numerous responses from communities, developers, and registered providers. Mix of views. Detailed housing policies flow from this strategic policy. To simplify, where comments relating to matters in the detailed policies are repeated for the strategic policy, they are reported against the relevant detailed policies (40 to 50)

General comments

- Support for: principle for developing good quality homes that meet identified needs; creating sustainable, inclusive, mixed communities; delivery of full range of housing
- Well phrased and appropriate, other than settlement hierarchy
- Parish Council support this policy through its Neighbourhood Plan policies
- Policy should be delivered in every community in the district, and support communities' demographic diversity
- Alternative view - Rather than being part of general housing schemes being required to provide the mix of needs, instead the plan should allocate sites specifically for self-build and custom housebuilding, and sites for gypsies, travellers and showpeople, - separate from allocations for unrestricted market housing, or be allowed to come forward as unallocated exception sites beyond settlement boundaries.
- Should clarify policy – it represents a district-wide objective and does not prescribe a mix which is expected to be delivered through individual sites
- Wants flexible approach on mix, to recognise that needs and demand varies within the district and between sites; need to ensure scheme is viable and provides an appropriate mix for location, size, suitability/capacity and market.
- Refer to other evidence not just the LHNA; and include consideration of current demand
- Need whole plan viability study prior to submission, ideally with development industry input
- Policy issues are appropriate, but EDDC needs to provide evidence on their deliverability
- Concerns: Policy is too long. Not easy to digest. Out of date. Government housing targets not mandatory; more housing/people will increase pressure on services; need infrastructure; housing is being driven by demand, not by meeting local needs.
- Government's arbitrary formula puts district under immense, unreasonable pressure
- Housing distribution/spatial strategy including proposed new town, conflicts with policy 39– ie growth is not located where there is a need but where land is available
- The plan should take account of the rural dimension of housing needs. Trend for increasing property values and rental costs in the rural housing market as insufficient open market and affordable housing were delivered over many years. The trend's harmful impacts are significant and varied, eg
 - People with local connections are often unable to afford to buy or rent properties. They are priced out of their own communities.
 - Young people are disproportionately affected by issues of affordability and exclusion from the rural property market

- Demographic diversity in rural communities is reducing as they become increasingly dominated by older people. Young families are an ever-diminishing proportion of the rural population as they cannot afford to buy or rent in those communities.
- Declines in demographic diversity have adverse consequences for rural communities eg viability of local facilities and the ability of rural communities to support social clubs and community events vital to their local sustainability

- Important to create a social mix and meet future generation needs. To create healthy communities, homes should be mixed up on sites, not segregated
- Need small houses for starter homes and for people to down-size to in their own communities, including need for park homes. Current assets may not provide sufficient value for some households to enable move into eg new build smaller units
- Devon County Council state the internal space of buildings should be of practical size to allow adaptability and include sufficient space for families to spend time together.

Affordable Housing

Many community responses with a range of comments, including:

- Acute need for affordable housing
- Affordable rent and housing must really be affordable
- People can't afford housing build below market value.
- Want affordable housing, not luxury developments
- Want more affordable units of decent size, not just 1 and 2 bed units
- Need to provide affordable housing for older people wanting to downsize
- Maximising delivery of affordable housing is an empty promise. Lacks detail
- Query the definition of "affordable housing". Government definition doesn't address lack of affordable rental accommodation for singletons, the elderly (single/couples), people on limited incomes and young families. Not enough housing built for young people
- Poor provision of social housing across East Devon.
- Right to buy caused a major shortage in social housing, and should not occur
- Sale of council houses, and increasing reliance on private landlords to deliver rented accommodation is a problem as private landlords are now leaving the market
- Real need in East Devon is for affordable/social housing. EDDC should address need for more 'council-style' housing which is affordable and built to zero-emissions standards. Want EDDC to cooperate with housing associations and small builders
- Alternative view - Too much emphasis on affordable/social housing.
- Want higher targets/lower thresholds

- Community support for a minimum affordable housing provision that is clear and robust enough to withstand the pleas of viability from developers
- Concerns about implementation: Developers must meet affordable houses commitments; want allocation of new build housing specifically for locals need to be put in place with legal covenants; local connection test should apply to all sites, not just rural exceptions
- Concerns about principal residence: not just second homes, but also holiday lets displacing permanent tenancies in buy to let market; where is the evidence that the issue is just coastal towns? Property in this area is being bought up on a large scale as second homes and short term lets. Second homes need to pay high council tax- they impact on potential for locals to own their own home.
- Some community comments - want limit to AirBnB rentals and much tighter planning/ tax controls. Concern over impact of unregulated short term lets on local housing market eg loss of long term residential rental units to short term holiday lets/non-residential lets
- All new housing should be for local people, not for second homes nor AirBnB and should not draw in people from other parts of the country
- DCC (Economy) comment that short term lets is only an issue in a small number of coastal areas
- DCC (Public Health) wants the influence of second homes to be adequately addressed in relation to sustainability and affordable housing
- Should be a requirement for housing for essential local workers
- Use Land Registry Covenants to restrict the purchase of new builds so they can only be sold to local residents in problem areas
- Local connection criteria should apply to Sidmouth and smaller settlements, not just to rural exception sites
- Devon Wildlife Trust want policy to include requirement for enhancement of natural environment and building to achieve net-zero carbon.

Registered provider comments

- Housing Association planning consortium supports using LHNA and up to date local housing evidence – it ensures affordable housing is provided in line with objectively assessed needs
- And supports mix of tenures to meet affordable housing need over the plan period, particularly needs of younger people and key workers
- Supports keeping on-site affordable housing threshold under review - maximise opportunity for affordable housing delivery. The threshold should continue to be as high as possible

Developer comments

- Not clear what “maximising” delivery of affordable housing means, so replace with “optimising”.
- Some developers concerned that inclusion of second New Town delivers fewer affordable dwellings than if development is elsewhere. Cranbrook was only deliverable due to the injection of considerable amounts of Government grant
- More comments are set out under Policy 40

Specialist housing provision

- Wide range of housing options for older people. Including apartments (sheltered living; extra care); lifelong housing; adapted housing; specialist care including dementia care
- Is the demand more for independent living in own home, designed to meet the more specific needs of older people
- Opportunity for large care village (400-500 freehold apartments) with communal facilities available on site, plus ‘satellite’ areas for housing for families caring for older relatives
- Support - convalescence / care homes are needed
- Alternative view: Is there really a need for more care homes?
- Why encourage retirement homes? Contributing to our unbalanced age demographic. Retirement complexes create ghettos, breakdowns communities/leads to resentment when younger people don’t see affordable housing being delivered. Policy could give a green light to developers to deliver more age restricted/ retirement accommodation in Exmouth that is then marketed out of region.
- If there is an identified local need for age-restricted accommodation, want a local connection restriction to ensure that the policy facilitates freeing up of family homes locally
- Housing for older people should be within easy walking distance of town centres
- Should support adapted older persons housing in villages to enable downsizing What evidence is there that older people want to mix with families

Adaptable housing

- Supports good quality designs for homes, with flexible internal layout. Occupiers needs naturally change over time.
- DCC comments that internal space of buildings should be of practical size to allow adaptability and include space to enable families to sit together to eat
- Self build/custom build housing

- Opportunity to build high quality homes at an affordable price, help local people build their own affordable home. Supports including self build on smaller sites
- Self build is one of the key initiatives that help local people build their own affordable home
- Self-build is not a priority at a time when we have housing shortages. Self-build should not incur any subsidies from council-tax payers.
- This is an unnecessary constraint to developers, especially as there isn't always a demand for self- build/custom build plots. Only require them where there is clear market demand
- Allocating for selfbuild can inflate cost of plots
- Have any self build plots been approved by EDDC?
- Very few windfalls come onto the open market; should not compare windfalls to the Self build register
- Concern over impact of selfbuild on local area's characteristics
- Some developers do not agree that there is always demand for self build plots and consider the policy unnecessarily constrains developers – policy should be reworded so only required where there is clear market demand.

Private rented housing

- Relied on private landlords to provide capital to deliver rented houses, since sale of social housing with no funds for councils to replace it. But landlords continue to leave the market due to regulatory/tax changes, higher interest rates, threat of longer-term tenancies, and a broken court system
- Housing for rent should be carefully monitored, landlords shouldn't be able to buy up lots of these properties just to profit from them
- Admirable set of intentions around renting. But is it realistic without more joined up thinking/investment in social housing/a different Government?
- Town Council concern: impact of unregulated AirBnB accommodation on the local rental market is not addressed and that support needs to be given. Wants EDDC to get involved in the government's review into short-term lets, to regulate home rentals effectively.
- Needs assessments
- EDDC has vastly overestimated the amount of housing needed
- How are needs quantified. How can assumptions be challenged?
- Where was the public involvement in assessing local needs for housing?
- Local market evidence represents suitable/appropriate evidence from which to determine local housing needs

Mix of housing types

- Should maintain a social mix, and meet future generation needs.
- Be clear what is meant by 'mixed housing'. It should be mixed up to create healthier communities, not segregated.
- Where is the evidence about impacts of meeting mix of housing needs within a site? and eg do elderly people want to live next to families with children?
- Want more small houses for starter homes and for people to downsize to in their own communities. Makes their larger houses available for families.
- Often preferable to develop town centre brownfield sites, but living in small often overdeveloped town centre properties most without parking, often doesn't suit a growing family and compromises the ability to work from home
- Too much old, non-energy efficient housing available. New housing should be well built, sustainable, social housing for people with a local connection.
- EDDC should repossess vacant homes. Should not allow developers to let vacant buildings rot away; instead refurbish to meet community' local housing need.
- Must refurbish and insulate properly.
- Encourage, not penalise, local landlords. They lose rent and incur refurbishment costs after a tenancy ends and have increasing overheads that are not reflected in rentals. Amend policy to focus more on property that is well insulated, cheaper to run, and lower rent
- Self builds are a much lower priority than social housing due to more demand for this in the local community.
- Concerned that including self/custom-build housing and provision for gypsies, travellers and showpeople, within larger housing allocations is not viable/deliverable due to differing interests / ownerships. Either allocate sites to meet these 2 types of needs separately from those allocations for unrestricted market housing, or allow them as unallocated exception sites outside of settlement boundaries
- The Otter Valley Association support requirement for a mix of site sizes and encouragement of small builders.
- Devon Wildlife Trust wants the policy to include a reference to the requirement for the enhancement of the natural environment and building to achieve net zero carbon.

Policy 40 - Affordable Housing

Many comments received from communities, developers, and registered providers

- Numerous, mixed, community concerns on the need and provision of affordable housing
- Several responses that there is a housing crisis.

- Current stock of affordable housing is comparatively low. Limited supply of available cheaper market housing in the current housing stock
- Many residents, notably young people can't afford to buy or rent housing in East Devon. Urgent need for truly affordable housing.
- Need for affordable housing is high as house prices in East Devon are already high.
- High prices mean property is an investment. Most new houses are bought for high prices by buyers from SE, portfolio holders and BTL landlords, not Devon people.
- Large developers raise the market price by land-banking
- Private rented housing is in very short supply, and the market is very competitive.
- Buy To Let landlords charge high rents, worsening the housing crisis
- No amount of house building will significantly lower prices. Macro-economic and fiscal policy factors that drive price changes are outside the plan's control
- Study by Action for Homes reported 2867 dwellings in East Devon are second homes or long-term empty. This is unsustainable.
- Stop building to satisfy a demand for 2nd homes. It's driving up house prices making housing unaffordable and unavailable for local people. No second homes should be allowed.
- Concern over the impact on affordability and availability of housing to meet local need where housing is being used for short term lets eg holiday/business purposes
- Economic consequences eg recruitment issues if housing costs are unaffordable
- Should remove Right to Buy and cap future sale price of affordable homes, Right to Buy simply transfers social housing back to the market at higher prices for sale or for private rent at higher rental levels.
- It's not just the cost of housing. It's also important that housing is well insulated/cheaper to run for people with lower incomes needing to rent
- The definition of affordable housing is challenged. What price of housing is affordable? Government's definition is not 'affordable'. Many local people can't afford to buy discounted market housing/First Homes
- Redefine affordable housing to mean social housing. Greatest need is in local community
- New housebuilding pushes up cost of housing. Help to buy schemes are unrealistic
- Want more genuinely affordable housing for purchase and rent aligned with local wages across the existing centres of populations
- Should focus on social housing only, for low-income people with local connection. A large proportion must be for rent, owned by not-for-profit organisations
- Want far more social rented to rectify current housing inequality for people in poorly paid or part time jobs
- Policy represents long overdue action for creating balanced and mixed communities
- One Parish Council supports this policy through Neighbourhood Plan policies

- Another Parish Council is concerned that the policy is too detailed, and risks losing the point of defining just the delivery. Advocates a separate DPD on this subject, as the variations are so complicated, the Local Plan becomes just about this subject.
- Concern that policy opens the door for developers to claim that it is not viable to meet Plan requirements after site is allocated and has planning approval.
- Developers' profit should not be made by not delivering affordable housing
- Community support for a minimum affordable housing provision that is clear and robust enough to withstand the pleas of viability from developers. Perception that affordable housing secured by planning obligations in the past was then reduced/removed on viability grounds. Developers wriggle out of promised provision, and then only provide high-cost housing. Want this stopped. Want firmer control by EDDC over developers, and to hold developers accountable.
- But can't force developers to sell only to local people or at an affordable price
- Support for new approaches eg EDDC Housing Task Force, as delivery vehicle alternative to achieving affordable housing through major housing developments/ S106 agreements. Better for council to buy land and have social housing built.
- EDDC should repurpose vacant homes for housing needed by the community
- Deliver affordable homes for local families/workers on brownfield sites not greenfield
- Support on site provision, don't want offsite provision/contributions
- How many of the dwellings will go to young couples/local people? How will the Council stop others from acquiring multiple properties possibly subsidised by local money. How will you stop fraud?
- Devon County Council (DCC) welcome the proposed affordable housing tenure mix, highlighting the importance of providing housing for Essential Local Workers, including Social Care staff. Supports priority for key workers within the local eligibility criteria for First Homes
- DCC welcome the tenure mix but must increase/prioritise affordable housing to reflect need and protect affordable housing for local people.

Community concerns about Table 1 (mix) include:

- Wanting much higher percentage to enable young people to stay in East Devon
- Why reduce the affordable housing percentage compared to the adopted plan
- All new housing to 2040 should be affordable
- Why is the percentage in the new town so low, where is the evidence? The plan relies on the new town to deliver much growth but the low percentage of affordable housing will increase the imbalance across East Devon and make delivering much needed affordable housing more difficult. Why should other locations deliver more?
- Want more detailed, location specific mix, not a generic district-wide mix

- Will override the housing mix policies in made Neighbourhood Plans that are specifically tailored to meeting local needs, and informed by local evidence
- Want higher percentage in large developments
- Hasn't Cranbrook already met the need for affordable housing?
- Policy is very prescriptive
- Concern over how long an SPD will take to prepare/adopt

Developer concerns include:

- Some support the policy aims but some elements are overly onerous/ prescriptive, notably the prescribed tenure mix of affordable housing on qualifying sites.
- As well as need, should also take account of viability and deliverability. Unrealistic to negotiate every site on a one-by-one basis where the baseline aspiration or combination of policies is too high. This jeopardises future housing delivery
- Policy is impractical. No opportunity to reconcile differences between policy provisions and evidence of need. Should be informed by local market evidence/ sales information.
- Let developers present evidence of local needs to justify affordable tenure mix
- Size and type of affordable housing is a matter for negotiation on a site-by-site basis
- A particular affordable housing mix should not be enforced to the extent that it causes harm to other planning considerations

Developer concerns about Table 1 (mix) include:

- Only some support for reducing percentage from current 50% down to 35% across much of East Devon- it will unlock growth on small/medium sized sites
- 35% is reasonable if expressed as a target rather than a minimum
- This should be a starting point for considering suitable tenure mix

But there are many developer objections to the mix.

- Advocates a bespoke approach to address local affordable housing need – mix of types /sizes appropriate to the location of a planning application
- Fixing the mix type /tenure of affordable housing over a 20-year period is not a flexible policy approach.
- Unclear whether the mix for affordable homes in the 2nd new town needs to be deliver by each development parcel or across the whole new settlement. To provide distinct neighbourhoods policy should provide flexibility on type and size, to allow land parcels to respond to their unique characteristics and new evidence
- Lack of evidence to justify the level of affordable housing mix

- LHNA is not a viability study. No evidence on overall plan viability yet exists.
- Questions viability of delivering 35% affordable housing and tenures mix in Table 1
- Supports para. H – alternative tenures can be proposed where viability is an issue
- Table 1 should be a starting point – take account of latest available housing needs evidence, site size, capacity and suitability for house type and tenures, and practicality of long-term management by a registered provider, and overall viability
- Some reserve their position pending the viability assessment results.
- Unclear if the viability assessment will cover affordable housing percentage, or if viability is assessed on a case-by-case basis
- Should not apply to sites within the Cranbrook DPD area
- 35% is substantially above the current 25% for main towns. CIL rates applicable across East Devon were recently set based on current Local Plan policy level
- West End sites viable at 25% affordable housing (this is what has been achieved)
- New Town site developer supports target of at least 15% affordable housing – as issues eg delivery and strategic infrastructure are substantially different in a New Town compared to smaller development sites. 15% target needs to be evidenced and subject to viability assessment
- Differential percentages demonstrate viability problems of delivering 2nd new town. Large infrastructure costs mean it will deliver less affordable housing than if sites were allocated elsewhere. It also displaces those in housing need and places a strain on family ties (similar to Cranbrook meeting housing needs from Exmouth)
- Another developer advocates an alternative approach. Embrace the Lichfield evidence approach ie Enhance/speed up delivery by using higher amounts of affordable housing, (ie 35% affordable housing at new town)
- No objection to the overall Affordable Housing target of 35% (for the majority of the district), but reservations over the tenure mix of affordable housing, as worded this indicates 64% for Social Rent and 36% for First Homes. This offers no option for Affordable Rent or other forms of affordable home ownership. It also offers no room for future initiatives towards affordability as it is very prescribed as worded. There should be flexibility to provide all forms of affordable housing as defined in Annexe 2 of the NPPF
- Under-provision of affordable rent
- Suggest that specific reference to the 2022 LHNA is removed. Broader wording should be included along the lines of mix to reflect up-to-date evidenced need and market conditions.
- Some respondents want the tenure split for the 2nd new town to apply to the rest of the district as a starting point for considering affordable housing provision on new development sites, subject to viability and up to date housing needs evidence
- Some support reduced percentages compared to the adopted plan
- Objections to policy's mix of affordable housing types. Remove table 1 (and policy on dwelling size mix). Wants policy to provide flexibility ie enable precise mix of affordable

housing (size and tenure) to be determined on a site-by-site basis at the planning application stage, responding to needs at that point in time, and taking account of viability.

- Overall plan viability assessment should be publicly available for comment before the Reg 19 consultation, so that in line with PPG the plan can be informed by engagement with developers, landowners, and infrastructure and affordable housing providers.
- Detailed comments from provider of private sector specialist housing for older persons, wanting amendments. Eg exempt such housing from providing First Homes, Starter homes and Discount Market Sales on site; clarify when review mechanisms are appropriate and how/when viability is reassessed over the development's lifetime; don't apply a review mechanism to this type of housing; viability assessment should specifically assess viability of older persons housing; want consistent policies regarding thresholds for C3 use classes.

Table 1 – affordable home ownership

- Some support for at least 10% of affordable housing should be affordable home ownership products
- Queries about whether policy will delivery Government policy of 10% of all dwellings to be delivered as affordable homeownership products. Need evidence on delivery.
- Some question whether proposed tenure mix complies with Government policy on First Homes (25%) and 10% provision of affordable home ownership and local needs identified in LHNA 2022. Assert there is a significant under provision of affordable homeownership
- First homes percentage in Table 1 well exceeds national planning policy.
- High percentage of social rent will have a detrimental effect on site viability; concerns about target realism
- Under-provision of other affordable home ownership products (not First Homes)
- Selling discount open market housing is extremely challenging because of the need for a substantial deposit AND meet eligibility criteria
- Policy is not flexible – as well as national policy on first homes, the plan should allow other forms of affordable housing, informed by up-to-date local evidence.
- Some developers object to the reference that commuted sums (off site contributions) should be broadly equivalent to that required on site. They object because there is no clear reasoning setting out what the relevant calculation might be.
- Some developers object to the lack of definition of 'small clusters' in Clause 2d). (Relates to distribution of affordable housing across a site.) Must clarify.
- Possible contradiction between para 2a and para 2c. Question whether it is appropriate for C2/specialist accommodation to contribute towards affordable housing given they are not 'conventional' dwellings.

- Agreement with pepper-potting affordable housing across a development sites, and the dwellings to be tenure blind

Registered providers concerns include

- Plan should acknowledge Housing Associations' role in providing affordable housing
- Encourage developers to have early active engagement with Housing Associations so the latter have active role in planning/design/meeting their management needs
- Community Land Trusts have a proven track record in delivering affordable housing. Plan should acknowledge working relationship between Housing Associations to encourage commitment in the plan to support CLTs' choice of sites
- Disappointed over the significantly reduced percentage of affordable homes required on new development. Concerned that forecast supply is only 3,551. Should plan to meet the evidenced need for 4,070 as a minimum.

Table 1

- Supports expressing percentage provision in terms of "at least"
- Housing Association planning consortium disappointed with reduction from 50% down to 35% in, given EDDC's intention to maximise the delivery of affordable housing
- Housing Association planning consortium supports the inclusion of affordable housing in the development of the second new town, which should also be as high as viably possible
- The 15% figure for the proposed New Town does not represent sustainable, inclusive development. Need to explore ways to increase this percentage to create balance community with mix of different tenures from early in the development
- Housing Association planning consortium – policy does not broaden housing choice, ie a policy contradiction. It completely cuts out affordable rented tenure, and home ownership products eg shared ownership. These overlooked tenures are widely used by Housing Associations and are successful affordable tenures. Tenure mix in Table 1 contradicts policy that 'proposals will be supported where they broaden housing choice'
- Consortium wants flexibility in policy to allow affordable housing needs to be met across the full spectrum of tenures. Consider tenure split on a site-by-site basis, and evidenced to demonstrate local needs
- Housing Association planning consortium –has long held concerns about the introduction of First Homes and implications for delivery of traditional forms of affordable housing
- Concerned about affordable tenure mix. Do not support First Homes as a mandatory affordable tenure. Concern over the affordability of First Homes (deposit and income

requirements are higher than for shared ownership). Strongly advise against excluding other affordable home ownership options

- First Homes assists some first-time buyers to enter the property market but will likely not help as many households as shared ownership currently does
- Shared ownership is more accessible, and flexible - allows household to enter home ownership with a small deposit and staircase up to full ownership over time
- Should remove references to securing affordable housing in perpetuity, other than on Exceptions sites. NPPF only refers to affordable housing in perpetuity on Rural Exception Sites. Do not support securing affordable housing in perpetuity more widely as it restricts lenders appetite to fund development; investors are discouraged if there is no prospect of realising the investment and returns
- Support for financial contributions for development of 5 to 9 dwellings in designated rural areas, they boost affordable housing delivery in the district

East Devon AONB Partnership. Even if there is proven need, sites in AONB should meet NPPF, be located and designed to respect the aims and purposes of the AONB designation and include an appropriate LVIA.

Policy 41 - Housing to meet the needs of older people

Many comments received from communities, developers, and specialist housing providers.

- General recognition by respondents that the proportion of older people is increasing as people live longer lives. Offering older people a better choice of accommodation to suit changing needs helps them live independently for longer, feel more connected to their communities and help reduce costs to social care and health systems.

Community comments:

- Devon County Council (DCC) - need to strengthen this policy to support provision of a more diverse supply of housing for older people, in particular affordable rented accommodation eg extra care housing and adapted housing for people with specialist needs. DCC are currently updating their evidence base on the need for extra care housing within Devon. Request discussion with EDDC on how to make adequate provision for extra care housing in suitable locations in East Devon including securing the land and delivering facilities

Contrasting community concerns about planning for housing for older people:

- A policy on housing for older people is needed. LHNA statistics provides evidence of the scale of need for housing for older people.
- However, one community group asserts the population of East Devon is not ageing due to local resident population getting older. Very recently younger families are moving into East Devon, rather than traditionally the overwhelming number of retirees.
- One view is that the housing needs of East Devon lean towards retirement, adapted, and affordable smaller dwellings. Older people choose to move to East Devon “to enjoy the later years of our lives in peace and tranquillity, and in many cases downsized and would financially struggle to move anywhere else”.
- An alternative view - Be realistic. Those who can afford it want suitable housing for their old age and will pay for it eg Lifetime homes mix accessibility with some space; but not tiny retirement flats with high charges. Inheritance tax discourages moves to smaller properties
- Some want Policy 41 removed because it encourages further influx from other areas, causing further unnecessary over-development.
 - Why encourage elderly people to retire here?
 - East Devon’s population is amongst the oldest in the country, many in housing not specifically designed for them.
 - Natural decrease means housing is not required to meet needs of existing residents
 - Policy appears to meet needs of those retiring here from elsewhere.
 - Leads to in-migration of elderly people, and an increasingly elderly population and demographic imbalance.
 - Puts extra pressure on stretched health service.
 - Encourages specialist retirement housing developers to exploit development potential eg of popular seaside towns
- There are already too many retirement complexes in some areas (Exmouth is cited as one example), which are not serving the local community but have adverse impacts eg changing the demographics and character of the area, and low wages
- An elderly population cannot sustain the future of the economy. Must be a balance towards a more diverse age integrated population to attract the best to stay/live here
- Some want housing to meet needs of existing, ageing residents to be a priority but not those that retire here
- Some want Policy 41 removed because it is age restricted and discriminatory. The plan should focus on housing for younger people. Retirement flats do not provide affordable housing (on site or by contributions)
- If the local plan is seeking to create a market for provision of housing for the over 75s, then it should do likewise for the younger sections of the population

There is some community support for policy for housing for older people

- One Parish Council supports policy 41 through Neighbourhood Plan policies
- One respondent wants policy amended to include requirement for housing for older people wishing to downsize but stay in their village
- Housing older people generates employment. Supporting small traders eg decorators/gardeners, home adaptations; personal care; and cleaners. Older people support town centre commerce. Some older people provide child-care for their working families
- Some want a good mix of accommodation but needs vary.
- One Parish Council wants provision of truly affordable housing for older people, not just those wanting to downsize to release capital
- Some who downsize from rented family accommodation can find nothing in a central area, near family and bus routes
- Many older people are still very active but require homes that create less work and have less stairs. Lack of bungalows is creating a supply chain bottleneck
- Some want a more robust policy - secure developer contributions towards health costs and insist on local connection.
- Some want a more permissive policy - let the market determine supply mix and percentage, so development takes place in accordance with demand. Many specialist providers of elderly homes have 100% elderly occupation, ie no 20% allocation of development for youngsters

Range of contrasting community views on the type and location of accommodation

- One view is that developers focus on a narrow part of the market – high-price/high-specification (leasehold or freehold) which attracts in-migrants who can afford them. The policy encourages ghettoised accommodation of gated and specialist communities
- Although another respondent asserts that demand for private sector age restricted housing is not strong – can take time to sell once marketing by developers is withdrawn
- There is also concern over developers' interpretation of care class uses/care accommodation. This impacts eg on contributions towards affordable housing
- One respondent asserts that the policy focus is on institutional settings and not normal dwellings. Should revise policy to take account of the thousands of older people urged to stay in their homes which are unsuitable unless adapted.
- Some want affordable housing for older people, not large retirement flat complexes
- Some want housing specifically for the elderly needs to be for those on low incomes (there are plenty of expensive retirement flats)
- Some want all new social housing to be built to cater for all ages.

- Others want more small houses for older people to downsize to in their own communities (towns and villages)
- Another view is that park homes can satisfy the needs of older people; opportunities to expand existing retirement villages eg Otter Valley Park
- There is support for new housing to be designed for whole life/ease of use by older people
- Some comments highlight a shortage of bungalows for people who want to still live independently. The plan should be explicit about providing bungalows. Others want to protect existing stock of bungalows/single level living. Concern over conversion of 2-bedroom bungalows to houses.
- Allocations should locate housing for older people close to community facilities
- Some want new housing for elderly people to be for those on low incomes, built near town centres on brown field sites. However, there is concern in towns eg Budleigh Salterton and Exmouth, development sites are too far for the town centre
- Sidmouth Cycling Campaign want sites to be easily accessible by walking, cycling and mobility scooters – as routes incorporating steps can be an obstacle to access
- Some say the policy is too prescriptive, inflexible, excessive social engineering. Housing for older people is not appropriate on all developments nor in all locations. So why 'pepper pot' elderly people as a percentage of every new development?
- No mention in plan of housing for 'comfortable' retirees to move in to and downsize

Range of developer comments:

Some developers support the principle of appropriate housing to meet needs of older people, but only where there is evidence of such need

- Housing for older people is not restricted to just traditional care homes and nursing homes. Developers are providing opportunities for a wide range of housing accommodation products designed to meet a range of needs including retirement living apartments; extra care apartments. Greater focus on independent living, as well as flexibility for moving into accommodation with care (to varying levels) and communal facilities on site
- But not every site will be appropriate for older persons housing, so the policy needs to be more flexible
- Policy needs to be subject to robust viability assessment. Cost and viability implications:
 - Specialist housing in Use Class C3 is age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care
 - C3 housing is not excluded from affordability calculation

- Significant extra cost with specialist housing – need to provide adequate communal facilities, and for some schemes provide on-site staff accommodation
- Concerns about viability. In any viability assessment EDDC should acknowledge that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing. So, housing typologies should be robustly assessed

Concern over the percentage in Clause 6:

- Blanket policy approach of 20% exceeds the need to meet at least 1,630 net additional specialist dwellings (by almost 1000 units). Could over deliver one form of accommodation at the expense of others that are needed. Wants a more targeted approach with flexibility embedded.
- Some developers are concerned that the policy requirement local plan allocations of 20 to 199 dwellings to include at least 20% specialist older person dwelling far exceeds the lower end of identified housing needs. In combination with a 35% requirement for affordable housing this would mean less than 45% standard market housing delivery on a site. (including self-build/custom build plots). Overall viability of schemes becomes doubtful. Policy is perverse. For a traditional housebuilder to deliver its market products it must deliver 60% of plots to affordable housing, older persons housing and self/custom build, and only 40% for its product. No evidence provided about the viability of the policy
- Should not apply to sites within the Cranbrook DPD area
- Concern over other clauses
- Provider of specialist housing for older persons comments that:
 - to be consistent with latest PPG Amend policy ie insert new point c) at end of point 1- set plan period requirement “ at least 6,224 should be specialist older persons dwellings”, based on LHNA evidence of need. Then planning applications don't have to provide proof of need for older persons housing.
 - Determine planning applications for specialist housing for older people, based on Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing is in Use Class C3 (dws); and Extra care housing, housing with care, residential care home and nursing home accommodation (including end of life / hospice care and dementia care home accommodation) are in Use Class C2. Local Plan policies on affordable housing and Exception Sites then don't apply to C2 element.

- Another specialist provider is concerned that urgent action is needed to meet need. Supports sub-clause 5 in widening choice. Sub clause 6 is welcome, but strategic sites are often inappropriate locations. Need for older persons housing is self evident, no need for developers to provide up to date evidence of local need
- Devon County Council welcomes policy but would like greater support for a more diverse supply of housing for older people, in particular affordable rented accommodation eg extra care housing and adapted housing for people with specialist needs, in particular in main settlements of Exmouth, Honiton, Sidmouth and Seaton.
- Inconsistency between criterion 4 re. “site is within 400m” and criterion 6 re. “ all development proposals for 20 to 199 or 200 or more dwellings...” - what if a development is beyond 400m of facilities? Need to clarify criterion 6.
- Clause 4. Refers to sites easily accessible by walking to town centres. Suggest this should be modified to “sites easily accessible by walking, cycling and mobility scooters” as routes incorporating steps, for instance, can be an obstacle to access.
- Clause 12a refers to Clause 8. This appears to be in error and should refer to Clause 7.
- Alternative view - Some developers oppose the policy:
- Instead of properly planning for specialist accommodation for older people (i.e. allocating) the Local Plan requires specialist accommodation for older people on site allocations above site thresholds. This depends on developers to contribute towards this need. It is an additional obstacle to conventional residential development.
- Many allocations and windfall sites are not suitable/appropriate for specialist older persons housing. Insufficient for policy 41 to be ‘flexible’.
- More appropriate to identify /allocate suitable sites specifically for providing specialist older persons housing. Allocating sites for specialist housing can provide greater certainty and ability to deliver in appropriate accessible locations such as town centres
- Local plan should only identify and allocate suitable and deliverable sites specifically for providing specialist older persons housing that meet those needs and respond effectively to demand. Want EDDC to look at evidence of need and supply across the district and engage with providers to understand operational requirements

Another alternative view - One respondent proposes a different approach. East Devon has amongst the highest percentage of elderly people in England ranging from early-stage retirement to frail elderly in need of care. The choice of retirement housing is limited and care homes and specialised housing with care are in crisis. The proposal relates to

- Horizon care village developments and satellite retirement developments
- Ambition is for a rolling programme of construction across the country
- Each development of approximately 500 homes comprising:

- High density, high specification freehold service apartments for frail, elderly and people with long term health conditions
 - Extensive on-site communal facilities
 - Specialist Dementia Unit
 - Separate development of freehold family homes for families caring for family member with a long-term health condition and children caring for a disabled parent
 - Satellite developments for early-stage retirement
 - On-site care and support (day care, respite care, reablement/rehabilitation, end of life care) - caring for multiple health conditions. Actively pull residents from acute settings and reduce long term conversions to long term nursing/residential care
 - Managed by Community Interest Company in consultation with residents' Commonhold Association
- In process of establishing a Care Academy - extend training for care workers to include long term health

Policy 42 - Accessible and Adaptable Housing

A range of comments on this policy, from the community but mostly from developer, housing association and specialist housing provider respondents. Mix of views.

Community responses:

- Devon County Council welcome this policy due to the importance of providing for groups which may not be catered for under conventional housing (such as older people and younger adults who may have disabilities or mental health issues).
- Growing need for properties to comply with Part M(2) or Part M(3) of Building Regulations
- EDDC hasn't taken this approach in the past. How will it be achieved?
- Town Council - policy targets will produce a very small number of accessible and adaptable homes, even on large developments. All new homes should be designed as homes for life.
- All housing aimed at seniors should be accessible to avoid people having to leave their home if they become disabled
- All new housing should meet those with a disability needs. Remove the word affordable as no new home will ever be affordable to those on low incomes.
- All affordable and rented homes should be wheelchair accessible
- Policy is useless without community facilities/services to meet the needs of these people
- Policy should also cover alterations and extensions to buildings, not just new build

- Only reflect the need of local communities as of today; do not encourage more in-migration
- Not good enough in a Climate Change Crisis
- Much of our housing is not suitable for wheelchair access, and cannot be altered

Developer responses:

Some developers support provision of accessible/adaptable housing.

- Policy is sound. Welcome Council's recognition that M4(3) provision is only required where supported by site suitability/viability
- New housing is opportunity to improve provision; depending on implementation and SPD
- Concern over how long an SPD will take to prepare/adopt

Some developers have concerns and objections

- Government proposals for mandating M4(2) requirement (and M4(1) in exceptional circumstances) are subject to further consultation on technical details, to be implemented through Building Regulations. M4(3) would continue to apply as now where a local plan policy is in place and where a need has been identified and evidenced.
- One respondent asserts that policy breaches Government guidelines by not recommending that 5,119 households/ at least 30% of the need for adapted housing could be met
- Flexibility is needed as certain standards may be difficult to achieve on certain sites and standards may evolve during the plan period
- Needs to be consistent with PPG; take account of site-specific factors eg flooding, topography/engineering levels, as they make some sites less suitable for M4(2)/M4(3) dwellings particularly if step free access cannot be achieved/not viable. This doesn't just apply to step-free access. Build flexibility into the policy -allow developers to demonstrate in some cases why this level of M4(2) may not be achievable
- Some developers object as policy requires 100% of all homes to be delivered to these standards. LHNA evidence is 30% of need to be M4(2) and M4(3) Goes beyond Building Regulation requirements, Part M4(2) and M4(3) are not mandatory. No evidence to demonstrate this is necessary/justified. Viability not tested
- Concern over the size of properties this policy will necessitate, and on delivering a mix of homes on site, how this affects density requirements and impacts on viability
- Policy should be subject to robust viability assessment

- Inability to scrutinise Reg 18 plan viability, will necessitate further consultation as part of iterative process in drafting policies before reg 19 stage
- If EDDC wishes to adopt the higher option standards for accessible, adaptable and wheelchair homes it should only do so by applying the criteria in PPG. Need local assessment evidencing the specific case for East Devon. And need a transition period
- Should not apply to sites within the Cranbrook DPD area – where development of the new town proposals are subject to a separate recently adopted DPD. Policy 42 will impact of development already progressing through the development management process
- Need to consider future market demand
- The proposed requirements need to be justified with evidence. If higher accessibility standards are justified, transitional arrangements are needed to allow developers to adapt to the new requirements, which will have implications in terms of additional floorspace required and associated cost.
- A Housing Association planning consortium supports the policy direction, but reminds the Council how the increased delivery of such properties may affect viability and overall affordable housing delivery in East Devon.

Comments from specialist housing providers raise concerns:

- One provider of specialist housing for older persons wants clauses b and c deleted from policy. Policy must be properly assessed within the forthcoming viability assessment, including a proper assessment of viability of older person's housing. Asserts that
 - Policy confuses older person's housing with wheelchair accessible housing.
 - M4(3) standard housing may institutionalise an older persons scheme reducing independence contrary to the ethos of older persons; notably extra care housing.
 - M4 3 Housing has a cost implication and may reduce the number of apartments that can be provided on an older person's housing scheme further reducing viability
 - Difficult for EDDC to justify the policy approach in absence of a viability study.
 - A 10% M4 (3) requirement for older people's housing would be justified (ORS para 7.56) and more viable rather than 100% requirement (ORS study para 7.57) in that would make sites unviable and result in a poor delivery of older people's housing.
 - People with a long-term disability or illness that requires wheelchair adaptable housing will not meet the age threshold for older person's housing. This further justifies disaggregating M4 (3) housing from older person's housing
- Another specialist provider asserts that the housing sector is increasingly challenging 100% requirement policy at Examinations and Appeal. Justification for 100% M4(3) requirement for wheelchair adaptations is based on flawed assumptions, and not sound.

- In the provider's development there is no need for apartments to meet M4(3) requirements with less than 1% of occupiers using a wheelchair full time. (eg where specialist housing is for the active elderly)
- Long term wheelchair users will have moved into suitably adapted homes earlier in their lives, and likely to remain there.
- Those in retirement living apartments with short term wheelchair use, can do so in home built to M4(2).
- Residential care/nursing homes are more appropriate for those needing permanent wheelchair use and greater care
- People with long term mobility disabilities would be in a different setting; not occupy an independent living retirement development.
- Cost of M4(3) provision is unjustified
- Caselaw - no policy requirement or control that LPA can impose over open market private apartments that could mandate that they must be sold to a wheelchair user

Policy 43 - Market housing mix

Several comments on this policy, mostly from developers .

There are a few comments from communities:

- Parish Council supports through Neighbourhood Plan policies
- Another Parish Council considers the policy has too many caveats, so needs tightening
- EDDC hasn't taken this approach in the past. How will it be achieved?
- Town Council- supportive, but implementation details will be important. Await SPD
- How will the housing need evidence be gathered?
- Policy will need 'teeth' otherwise anticipate developers will object and appeal
- Need less 4 bed dwellings and more 2 bed dwellings, eg for younger, local people.
- Not just about number of bedrooms. It's also need sufficient living space including for home working.
- Should concentrate upon densities and room sizes. Create accommodation in roof spaces
- Absurdly prescriptive. It supposes we can predict bedroom requirements to 2040.
- Inflexible, compared to market delivery. Won't housebuilders provide for/adapt to market?

Most comments are from developers:

- Some developer/housebuilder respondents support objective of policy to provide mix of house types and property sizes in locations consistent with spatial strategy
- Acknowledge policy includes acceptable circumstances where a proposals departure from the required housing mix is justified. Retain this in future iterations of the plan

However most developer comments are concerned that the policy is too prescriptive:

- Some assert the policy is misguided and unnecessary Let the housing market determine if Market mix is most appropriately left to the developers to determine. Policy should be deleted
 - Should not have a table with suggested mix based on 2022 needs in the Policy for the plan period up to 2040
 - Can't implement policy based on the number of properties for sale. Outside EDDC control
 - Households are free to choose what open market housing they want and can afford. Including demand for housing larger than they need
 - If there is the need for the size of property then, developers respond to that demand.
 - Plan should take a proportionate approach, not try to control every element of a scheme. Putting ever increasing levels of detail and ratcheting up requirements will not aid delivery of housing
 - Housing needs change over time and differ across District.
 - Decide on a site-by-site basis
- Others want Policy 43 to state that the mix of property sizes for market housing shown in the East Devon Local Housing Need Assessment 2022 is a starting point
 - Some broad support for policy but needs to avoid being overly prescriptive so development can respond to local character and setting
 - Want a flexible approach towards housing mix which recognises that needs and demand vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market
- Policy should refer to demand. to reflect that people generally express a demand for a property that is bigger than they specifically need

- New housing doesn't just cater for net household growth. It is a means for people to move around within the market, freeing up properties along the housing ladder, eg enabling households to upsize
- Policy should refer to trend for homeworking many reasons why people want more space for this
- Some object to the percentages in the table in the policy, as they are based on the Local Housing Needs Assessment 2022 The LHNA is a starting point, - the mix should also have regard to local evidence, site specific consideration and viability
- Conflict between 2022 LHNA data and local up to date evidence of parish housing need
- Some suggest that specific reference to the 2022 LHNA is removed. Broader wording needed eg mix to reflect up-to-date date evidenced need and market conditions.
- EDDC should work with local communities to carry out local housing needs assessments
- 1 bed market housing is not typically desirable/viable. Combine 1 and 2 bedroom figures
- Policy should refer to different types, not just sizes LHNA does not consider need for bungalows. These have an important role in meeting needs. Add reference to different types of accommodation, specifically bungalows.
- Concerns that this should not be a blanket policy: across all sites
 - Should only apply to larger sites and/or take account of local character/density.
 - EDDC should work with local communities, and carry out local housing need assessments to inform a case-by-case assessment of appropriate housing mix, for housing delivery to meet identified need
 - Want flexible policy, as housing needs change over time and differ across district.
 - Should decide housing mix on a site-by-site basis at the planning application/ Reserved matters state, taking account of up-to-date evidence on need, supply, demand and location. Control mix by planning conditions.
 - Should not apply to sites within the Cranbrook DPD area.
- Example of departures is very detailed. They could be broader. Market conditions should be an example of where a departure from 2022 LHNA may be appropriate
- Amend sub-clause 4 to exempt specialist forms of development e.g. specialist older persons or student housing
- Paragraph 5 should be deleted as unclear what it will require in practice, given the policy already accepts the need for flexibility (in paragraph 4).
- Clause 5 only allows different open market mix in exceptional circumstances. This does not provide sufficient flexibility as required by NPPF
- Unclear what is meant by market conditions evidence demonstrating lack of marketability' and what is required. Should delete.

Policy 44 - Self Build and Custom Build Housing

Several comments from community and developer respondents, with a range of views.

Community comments are mixed.

- Parish Council supports through Neighbourhood Plan policies
- Another Parish Council questions the need for the policy during a housing crisis. Would someone working in a low paid job ever consider this option?
- Proportion of selfbuild in UK is too low. Big developers' schemes/national designs dominate, resulting in identical looking estates. lacking in vernacular look.
- Doesn't really promote selfbuild. EDDC should take selfbuild seriously. Opportunity for high quality homes at affordable price. Help local people build their own affordable home.
- No selfbuild units built in last 6 years. Misleading to compare windfall sites to the selfbuild register. Only a small percentage of windfalls come on to the open market.
- Supports promoting self-build, especially truly affordable, smaller units
- Supports encouraging Neighbourhood Plans allocating suitable sites
- Town Council – viability consequences when combined with affordable housing policies?
- Selfbuild should be lower priority than social housing
- Policy is irrelevant. Not a priority.
- Do not permit grandiose designs unless the selfbuilder has the funds
- Avoid inappropriate development eg in AONB, CAs, SACs
- Self-builds should reduce embodied carbon, use sustainable energy, limit car spaces

Most comments are from developers, with a mix of views:

- Some developers/builders oppose policy for delivering self/custom build as a percentage of larger sites. Potential conflict: between housebuilder and selfbuilder; and in managing communal areas. Advocate small bespoke allocations for selfbuild or just policy support for such housing on exceptions sites in/adjacent to settlements.
- Policy is onerous, not justified and not achievable. Will delay delivering housing
- Policy is not market-facing market facing to provide It would be more effective to have an exception site policy that allows self-build or custom-build on a case-by-case basis.
- Question whether self/custom builders want to build on a larger housing scheme.
- PPG sets out how LPAs can increase the number of permissions that are suitable for self and custom build housing. Possible alternative policy mechanisms to delivery

opportunities for self/custom build eg small /medium size sites specifically for this purpose, or policy allowing them outside but adjacent to settlement boundaries

- EDDC does not have appropriate evidence to justify site threshold and percentage of self- build housing

Some developers have concerns and some want the policy reworded:

- Policy should be worded with the ability for appropriate triggers to be negotiated on a site by site basis.
- Unclear whether there is a demand from custom and self-builders to live on site within larger developments
- Only require self/custom build plots where clear market demand for them on developments. Where there is no demand, the developer should not be penalised for not delivering specialised dwellings on new developments
- Concerns about: mixing styles/materials; site safety/security. How will EDDC control this?
- Developers' reluctant to offer selfbuild plots within larger areas potential conflict eg from styles and design/ management of communal areas/plots that are unfinished
- Health and safety concerns about enabling access to plots within active construction site
- The inclusion of affordable plots will have viability and delivery constraints. Lack of cost assessment and viability evidence to justify policy
- Should not encourage selfbuild at the expense of small builders. Instead, develop smaller sites/ encourage local building businesses to prosper/employ local people
- Should not apply to sites within the Cranbrook DPD area
- Provider of specialist housing for older persons wants new clause – 'Older person's housing schemes are exempt from the above requirement'. Such schemes are often on brownfield sites, need to be high density, minimum of 35 to 40 flats and already marginal viability. Threshold is impractical/not suitable. No room for self-build plots.

More specific comments from developers on Clause 1

- 5% requirement should only apply to the market housing, not the whole site capacity
- What is the evidence to justify the percentage and size thresholds?
- Amend Clause 1a to '6 to 12 months' for marketing; remove 'from being fully serviced and developable' as it's unnecessary/causes delay
- One respondent wants marketing period of 6 months (maximum of 12). A developer suggests a marketing period of 12 months (not 24 months) as more appropriate.

- Clause 1a - 24 months window doesn't help self-builders. Developer only sells the plot if retained as the builder. No price advantage, which puts off self-builders. Developer builds rest of site in the 2 years then claims self-build plot not sold
- Site could be developed within 24 months which would require developers to pause building on a development. 12 Months is more appropriate
- Clarify Clause 1b – Define 'early stage'. Access/services can be conditioned
- Impractical to provide road access on large, phased strategic sites at an early stage of the development or to make the self-build provision available for sale before 50% of the dwellings on the site have been commenced. Instead, require developer to make available the self and custom housebuilding for sale before 50% of the dwellings had commenced in a phase containing self and custom build housing Amend 1b to be accessible for pedestrians as well as vehicles
- Clause 1b - policy could be worded with the ability for appropriate triggers to be negotiated on a site by site basis
- Delete Clause 1c – no justification for requiring the self/custom build plots to all be made available before 50% of the dwellings have been commenced. Instead control through conditions
- Developer states not possible to make custom and self-build plots for sale before 50% of dwellings on site have been completed as would mean significant health and safety concerns with enabling access to plots on an active construction site
- Clause 1c - policy could be worded with the ability for appropriate triggers to be negotiated on a site by site basis
- 1e Wording is not accepted - impossible to commit to such wording at an early stage due to factors which may impact on development implementation eg fundamental health and safety implications during construction
- Clause 1f - affordable plots will have viability and delivery constraints. having a policy that requires affordable plots, adds an extra layer of complexity
- Combine clauses 1g and 1h and clarify to ensure any potential design code/ passport relates to the self or custom build dwellings and not conventional dwelling
- Delete Clause 1i is unreasonable. No legislative or policy basis to impose a requirement for any obligation for developments to be delivered and completed within a set timeframe. No lawful means to implement – cannot be reasonably enforced or conditioned. 3 years is too short for completion. Policy could lower interest in self/custom build.
- In law, it is the responsibility of the Council, not landowners or developers, to ensure that sufficient permissions are given to meet demand
- Thresholds are impractical and unsuitable for specialist forms of accommodation such as retirement living apartments for the elderly. They are high density accommodation and there is insufficient room to accommodate self/custom build plots on the site
- Thresholds are incompatible with other specialist housing eg flatted development

Policy 45 - Residential Subdivision of Existing Dwellings and Buildings and Replacement of Existing Dwellings

Only a few respondents commented on this policy:

- The Environment Agency state that this policy represents an opportunity to embed within the plan their local flood risk standing advice for changes of use to residential and replacement dwellings in areas at risk of flooding. This would help provide certainty and consistent expectations for applicants, simplify decision-making for planning officers, and ensure such proposals result in more resilient buildings.
- Parish Council supports through Neighbourhood Plan policy
- Town Council - Policy is subjective. How to define 'adequate'?
- Some community support for policy. Easy to subdivide older properties to produce more dwellings density and without unduly changing street character. Subdivision is an opportunity to save older historical buildings as part of the area and to retain original fixtures/fittings
- Subdivision must be in keeping with the property and surrounding area; meet standards.
- Supports retaining existing buildings. It reduces the amount of building materials required and reduces waste to be disposed of
- Supports minimising hard surfaces in front gardens
- Supports adequate parking provision
- Every development needs off street parking but without hard surface on front garden
- Wants requirement for covered storage in the development.
- Does not support rebuilding/replacing smaller homes with larger homes
- Concern about subdivision impacts ie out of character, loss of gardens, overbearing, noise
- Policy is too specific/over the top. Is it necessary?
- Embedded carbon policy is too prescriptive/complicated/too wordy. Environmental benefits unclear. New buildings are built to higher standard/deliver more dwellings than replaced.
- Adverse impact on the sustainability of smaller villages. Policy does not support villages to attract future generations. Does not provide comfort for anyone considering investing money in purchasing a property in smaller villages not in the settlement hierarchy tiers that they will be able to later reasonably develop them further so that growing families are not forced to move to find housing appropriate to their needs

Policy 46 – Householder Annexes, Extensions, Alterations and Outbuildings

Only a few respondents commented on this policy. Some support but also some concerns.

- One Parish Council supports through Neighbourhood Plan policies
- Another Parish Council considers this policy is not justified. It could restrict farmers' ability to meet the changing needs of their family. These properties would enjoy PD rights. Policy 46 is inconsistent with Policy 50 which allows minor works without reassessment of need.
- Town Council – what is the justification for limiting GIA increase to 30%?
- Concern that alterations tend to make houses bigger, reducing the stock of smaller houses for people to down-size to or use as starter homes
- Policy is correct, but the problem is that the policy is not applied. Need stronger monitoring of policies otherwise policy is ineffective
- PD rights are more stringent in AONB, particularly loft conversion. Wants para 8.99 amended to exclude loft conversions in AONB where design is acceptable
- Considers that annexes and extensions and outbuildings must not have a detrimental visual, amenity and privacy impact on neighbouring properties
- Proposals must take account of neighbours' views
- Extensions need to be in keeping with main building; should meet housing standards
- Agrees annexes, extensions, outbuildings should be integral or linked to the main dwelling
- Town Council - must condition annexes so they are ancillary to main dwellings AND not AirBnB accommodation. Concern about enforcement
- One respondent takes a contrary view. Wants annexes to be able to be used for social housing when their need by the family in the main building has ceased. Why have an empty property that could instead meet other people's needs.
- Extensions/alterations are concreting over gardens, and reducing on-site parking
- How to manage increased drainage pressure? Or protect against loss of flora?
- Concern over impacts on neighbours from extensions built too close to site boundary
- Extensions e.g. to create bedroom(s) can turn into AirBnBs. Need to take enforcement
- Adverse impact on the sustainability of smaller villages. Policy does not support villages to attract future generations. Does not provide comfort for anyone considering investing money in purchasing a property in smaller villages not in the settlement hierarchy tiers that they will be able to later reasonably develop them further so that growing families are not forced to move to find housing appropriate to their needs
- Disagrees with ban on improvements to affordable house or agricultural worker's dwelling.

- Why restrict buildings' potential? Why treat affordable and market housing differently?
- Reduce or remove policy. It is too prescriptive/arrogant/overdone. Planning controls on extensions are already sufficient, don't need more controls
- Should focus on existing old/abandoned properties that can be regenerated to provide dwelling(s). Regenerating brownfield sites should be the priority, not new-build.

Policy 47 - Hostels and Houses in Multiple Occupation (HMOs)

Only a few respondents commented on this policy

- Some support for policy
- HMOs should not be used to house young families. HMOs only appropriate of young single people, not the norm for older adults (except by choice)
- No mention I plan of better use of existing housing by encouraging the conversion of large houses to multiple occupancy
- Concern over poor HMO provision in Exeter, apart from student lets
- Overly prescriptive. But problems can occur, warranting close scrutiny of applications
- Clause 2 - Provide more parking spaces on site to avoid on street parking.
- Size of parking spaces/garages needs to be realistic, mindful of modern car sizes
- Objects to Clause 2 not requiring cycle storage if site has access to public transport or is within 800m walking distance of town centre. Cycling is an attractive mode at that distance
- Clause 2 – concern if provision is not made for parking. On-going cuts to bus services mean that cars will be needed even in town centres. Need electric car charging
- Clause 4 Town council supports the policy but internal standards need higher specification
- Clause 5 Sensible policy for careful subdivision of large houses which can help meet need
- Must maintain HMOs to high standard. And retain character. Use suitable insulation to avoid damp. Need for soundproofing.

Policy 48 - Provision for Gypsy and Travellers, and Travelling Showpeople Sites

Only a few respondents commented on this policy.

- The Environment Agency are pleased that this policy includes a requirement for these proposals to 'avoid sites vulnerable to flooding or affected by any other environmental

hazards that may affect the residents' health and welfare'. This is essential because such developments are considered highly vulnerable and should not be permitted in areas at risk of flooding.

- Sites must support the needs of the travelling community.
- Supports need to make adequate provision
- No evidence to justify quantum of pitches at proposed new town
- Town Council questions EDDC plans for vanlifers. How will plan differentiate legally between travellers, showpeople and vanlifers?
- Sites must have access to utilities (water, sewerage & water disposal, drainage)
- Sites for small groups only
- Sites should not affect residents of the area.
- Sites should not tolerate antisocial behaviour
- Doubts that the new settlement would be suitable
- Proposed LP allocation is next to M5. Contrary to WHO's health requirements – noise/pollution impacts
- For countryside sites -wants evidence that needs cannot be met elsewhere in district
- Approved provision in Hawkchurch is used for social housing (static caravans and touring pitches). No further need in Hawkchurch. Look elsewhere rather than change use once approved

Policy 49 - Rural Exception Sites and First Homes Exception Sites

Most comments on this policy were from communities and a Housing Association Consortium.

- One Parish Council advocates a separate Affordable Housing DPD, to include this policy. Exception sites in rural villages are very sensitive. Should be aimed at 'Social Rents' and not affordable rents
- Some broad support for policy. Part of strategy to deliver affordable housing.
- Should encourage every village to bring forward schemes under this policy. It's the best way at present of producing homes badly needed for natural growth in communities deemed 'unsustainable' as shops, pubs and schools shut due to lack of customers/pupils
- CLT comment is that Rural Exception sites offer CLT a more appropriate planning method to secure affordable housing sites that will have community support. This contrasts with reintroducing settlement boundary which frustrates CLT in trying to secure land for the building of affordable housing.
- Why not 100% as affordable housing?

- Housing Association Planning Consortium supports the policy proposal for a small element of market housing to provide sufficient cross-subsidy. Affordable housing delivery can be fast-tracked when there is no grant funding available
- Consortium emphasises that NPPF/PPG do not define small. Local Plan's definition for this policy is too prescriptive, will inhibit the ability to maximise affordable housing opportunities on Rural Exception sites
- Rural exception sites should encompass self-build.
- EDDC will need 'teeth' to implement the policies. Need more detail on implementation
- Any guarantee that dwellings approved would not be sold on to the open market for profit, and to outsiders? How would this be implemented?
- Should protect AONB from development. Policy could lead to development in the AONB. Inconsistency between policies. New starter type homes are not allowed AONB by this policy. So should reject sites eg Exmouth 17, Littleham fields of 410 houses in the AONB.
- Policy should not be justified on a District wide basis; housing need should relate to settlement.
- Housing Association Planning Consortium considers that as well as the LHNA, plan should recognise the East Devon Housing Register as another key evidence based to inform Rural Exception Site proposals
- Query raised about relying only on East Devon Local Housing Needs Assessment to justify exception scheme in a small village of under 3000 people. This is contrary to PPG-which requires proven need in relation to the local community. Need to amend policy
- 2 comments about Rural Exception Sites and First Homes Exception Site clause 2 ('A small element of market housing...')
 - A Town Council considers the percentage of market value housing to be high.
 - A Community Led Housing CIC considers clause 2 is impractical. Rural communities seek 100% affordable housing on RESs. Landowners will require the open market plots, which are then unavailable to CLT/HA for cross subsidy. Landowners dispose of land for affordable plots at £1, but it's not enough cross subsidy to deliver affordable housing without grant. Homes England can regard the landowner as benefitting too greatly and refuse to allocate grant. CIC consider that enough landowners are willing to bring sites forward at 100% affordable housing. Under NPPF the opportunity for market homes on RESs is at the LPA's discretion
- Devon County Council query whether the last paragraph would include Gypsy and Traveller community who are already residing on a particular site. They highlight the adverse issues with this, and that it would be severely limiting for families
- Support for SPD to provide further guidance

- Occasionally this type of development is justified but only rarely, ie 'exceptional'
- Keep Exception sites to an absolute minimum. They cause settlement boundary creep. Keep development within the settlement boundaries and housing plans being proposed. Apply this approach to the development plan before any exception sites are considered.
- Policy could be unnecessary if more restrictions were placed on second homes, Airbnbs, buying to rent. Or if more affordable housing were built.
- Policy approach is second best. It doesn't apply rigour to strategic planning
- Should not allow this type of development if it is on sites rejected under the Local Plan. Instead seek more affordable housing when site allocations are being developed.

Policy 50 - Housing for rural workers

Only a few respondents commented on this policy:

- Parish Council supports through Neighbourhood Plan policies
- National Farmers Union support the specific provision for rural workers to allow the provision of a suitable property (either conversion or new build) on a farm business where a need can be clearly shown.
- Must look after the Farming and Agriculture Community. Need to maintain our agricultural industry and support those that work in it notably those with a local connection
- Concern that many agricultural workers dwellings have been lost over the last 20 years
- Policy is necessary to solve the problems caused by the recent lack of migrant workers
- Support for stringent requirements being placed on rural businesses. This compares with very poor enforcement of illegal development in the countryside, that's led to retrospective applications and time-related confirmations of planning status.
- Any dwelling should be linked to the rural occupation on site and not located elsewhere within the vicinity. ie farm workers on farms
- Policy should never be used by businesses that are not proper rural businesses
- Town Council - policy might be open to abuse at the cost of the countryside. It could have unforeseen consequences when change of use applications result in rural properties being used as holiday accommodation. Policy 50 is at odds with the diversification policy.
- Policy is more prescriptive than last plan. More appropriate if policy aligned with wider sustainability /policy goals (eg local facilities and employment) than being prescriptive.
- Specific comments on clauses
 - Clause 1a. One respondent does not support the word 'existing need' as applied to rural businesses. It's self-defeating, unnecessary and could be interpreted as

meaning they already live on site. Meeting the test of 'essential need' to be resident on site is sufficient

- Clause 1d. Unclear if policy means that a greater visual/environmental impact next to an existing building is preferable compared to a lower impact of an alternative location. Wants more concise text eg just minimise the visual and environmental impact.
- Clause 1e. One respondent considers 150sqm is excessively large compared to standard sized accommodation. Another considers that a 'one size fits all' approach to floorspace is not appropriate. A specific floorspace figure could be discriminatory. Floorspace should be commensurate with the functional need
- Clause 3 – Clarify the phrase 'need is unproven' ie say 'financial' need is unproven.
- Devon County Council suggest a time clause for the review of an occupancy condition should be added to clause 3 in the policy.

Chapter 8 - Policy omissions from - Meeting housing needs for all

There were calls for policy on or related to:

- Concerns that housing should be for local need/people and not holiday or 2nd homes. Call for policy around restricting 2nd holiday homes, and short term lets
- Include a principal residence policy. Could a covenant be used to protect affordable housing from being purchased from outside the District?
- Should recognise the results of the Letwin Review on housing buildout. The housing market controlled by the big 4 builders was broken. Support proposals to require rapid build out once Planning Permission has been granted, rather than slow build out to maintain high prices and profitability
- Devon County Council state the influence of second homes needs to be adequately addressed in relation to sustainability and affordable housing.
- Rain gardens:
 - The Sid Valley Biodiversity Group -
 - Welcomes the inclusion of references in the draft Local Plan to permeable areas for gardens at Policy 45 – although there could be more robust recommendation for 'rain gardens' to be provided to ensure the same policy outcomes.
 - Sustainable Drainage Systems: It is disappointing that there is no insistence in the draft Local Plan to the use of SUDS schemes, in particular for new developments.

Chapter 9 - Supporting jobs and the economy and vibrant town centres

General matters raised in respect of this chapter included

- Lyme Regis Town Council would like more emphasis on and greater support for working from home to help with the climate crisis.
- In the absence of the EDNA it isn't possible to appropriately assess alternative strategies
- Need should be assessed on a sub-regional basis, with East Devon accommodating a higher level of employment
- East Devon should accommodate Exeter's displaced employment land through allocations

Policy 51 - Employment development within settlement boundaries

- Respondents were generally supportive of the principle of encouraging employment at settlements and providing local jobs and jobs alongside new housing.
- Strong support for improving town centres and focussing employment in them.

More specific points included:

- Devon Wildlife Trust advised that Natural context is missing from this policy. Reference should be made to the inclusion of the natural environment within employment areas in order to ensure that people are able to work in areas where they are connected with nature.
- Policy is contradictory- only allowing employment if there are no adverse amenity impacts could exclude most employment uses, thus allowing a change of use to residential.
- Need to create well paid jobs for local people, not just encourage specialist employees to move to the region. The existing local workforce need improved and better skills training, the choice of jobs being made available, and increased wages. A lovely natural environment doesn't compensate for low wages.
- Housing development needs to be explicitly linked to increases in employment land so local people can work close to home.
- Clyst Honiton Parish Council believed that commercial development in rural areas should provide jobs for locals and not increase traffic. They are concerned that office developments could lead to more vehicle movements.

- Gittisham Parish Council stated that the Local Plan's allocation of 15ha of employment land at Honiton is excessive, given the amount of vacant employment land and floorspace in the area. The council also believes that the development of high-quality employment opportunities at other sites in East Devon will make Honiton less attractive as an employment location.
- Support policy approach of resisting loss of employment land but this approach should be further strengthened by a policy that limits housing development if additional employment land is not developed in parallel.
- Support joint commission of Economic Development Needs Assessment for the greater Exeter area. Crucial to ensure that the extra employment land will be sufficient to accommodate the additional jobs required and siting will be suitable and minimise commuting.
- Employment opportunities should be developed within or next to existing employment sites, and not within residential developments.
- There should be a coherent framework for recovery and growth beyond allocating slabs of bare employment land. EDDC is well placed to encourage sustainable economic activity by supporting established businesses, encouraging start-ups, and creating a positive and welcoming environment for the sector.
- Economic growth is entirely compatible with the green agenda.
- A range of independent businesses should be encouraged, and selling and producing local products would support this.
- Business parks (such as Liverton) should not be expanded until they are full.
- Redevelopment of business parks (such as Pankhurst) indicates that there is not a need for large commercial uses.
- Commercial use in the countryside should be restricted to farms and agricultural use only.
- Failure to control ancillary use has led to a proliferation of retail and hospitality at out-of-town centre locations, damaging town centres.
- The Plan should include a positive strategy for the future development of town centres and masterplans for all East Devon towns to set out the measures (and actions) to meet their potential
- Each town centre should have an individually tailored set of proposals (or Masterplan) to take them through the Plan period. These should comprise a mix of specific proposals and general policies pertaining to that town. They should be core sections within an East Devon Local Plan, as they are everywhere else.
- Town centres need basic maintenance and cleaning; decent essential facilities and services; modest levels of investment and adequate, reasonably priced parking. Town centres in East Devon look and feel neglected and abandoned.
- Decent town centres are essential to tourism

Policy 52 - Employment development in the countryside

- This policy received quantified support as some respondents felt that employment in the countryside should be linked to rural activities/produce and there was concern that unacceptable impacts could arise from traffic and noise.
- National Farmers Union state that farm businesses will always need to develop and adapt in order to meet market requirements and also stay viable. This is not always 'intensification' as stated in the draft plan but may just be moving into a different part of the agricultural sector, which would require different infrastructure. Where a business can show a need to develop in order to remain financially viable it is important that the local plan can facilitate this or it risks contraction in agricultural businesses and a loss of employment.
- Object to policy as it doesn't recognise benefits of business parks in the countryside eg Greendale Barton. Agents for the owners say that the site is not isolated, a major A road with bus stops runs alongside it, the site is very attractive to businesses and is fully occupied, it is operationally sustainable due to being exclusively powered by renewable energy generated on site and the owners have a 22 ha expansion plan to enhance overall sustainability as well as providing for more businesses. In future it will meet the needs of the new town.
- Support a wide mix of sites and intensification/extension of successful sites
- Include policy reference to need to balance adverse aesthetic impacts against benefits in areas of high employment demand
- Include reference in policy to additional consideration being given to existing employers to safeguard existing valuable jobs
- Re-use of existing rural buildings only where they are not close to residential buildings so would not impact upon their amenity with additional traffic, noise etc.
- Intensification of current operations is permitted with some constraints, but need greater consideration of the impact on residents and traffic. Workshops using heavy machinery generate noise and cause distress to nearby residents.
- First section of policy requires criteria on which to judge potential harm.
- Second part of policy is unrealistic in terms of being readily accessible to the Tier 1 and 2 settlements via a range of modes of transport, and noting that the farm diversification policy refers to access to tiers 1-4.
- Is this policy intended to apply to agricultural development? A separate policy for agricultural buildings and other development such as slurry lagoons would be better.
- Policy should require a demonstrable demand for new Employment development in the countryside as otherwise there is the risk the land could be used for residential purposes by default.
- This policy is open to mis-use

- Too permissive and open ended. Development in the countryside should be limited to that which supports local and rural enterprise and has no visual impact or requirement for HGV's unsuitable for local lanes.
- Commercial uses in the countryside should be associated with agricultural use, increasing sustainability and access to local produce. This would reduce need to import food.
- Converting old farm buildings such as barns into independent shops ie a farm shop or to rent as a home or holiday is ok, but priority must be given to agricultural workers.
- Local farm shops should be encouraged (Exmouth was suggested as a potential location)
- This is standard policy to control these circumstances but should be enforced.
- The East Devon AONB team support the requirements that “the scale, siting and appearance of buildings and activities associated with the proposed development is appropriate to the rural character of the area and will not adversely impact local amenity” and “no adverse impact on the character of surrounding natural or historic environment”.
- Policy is too restrictive by not applying to existing business parks, industrial estates, employment sites in the countryside – need to provide opportunities for rural businesses to grow, crucial for the prosperity of the rural economy.
- Support intensification of existing rural employment businesses but policy text does not reflect more supportive justification text.
- Hawkchurch Parish Council - As it stands, this policy could allow development that would have adverse effects on local neighbourhoods because of increased traffic, noise, etc. Criteria should be included that address such potential impacts. It would also be worth considering the location in relation to settlement boundaries – any such business in the immediate vicinity is more likely to have adverse impacts on communities.
- Policy must be explicit that development includes the intensification of businesses via the expansion of their operational sites.

Policy 53 - Farm Diversification

- The Environment Agency support this policy and welcome acknowledgment that it may be necessary to limit the scale of on-farm anaerobic digester. There are some existing sites in the district that attract complaints and further expansion should be considered very carefully, especially for businesses that could cause additional or new complaints regarding odour, noise, dust, or other nuisances.
- Suggest that 'established farm holdings' are defined as those that have been operational for some years until present.

- National Farmers Union support the policy but state that it is hard to always remove all adverse impacts and these must be viewed objectively and not allowed to be weighted heavily against a proposal
- Need to consider what adverse impacts such as traffic, noise or other pollution, there may be when in, for example an historic village or hamlet, close to homes / with quiet lanes used by residents for walking, cycling, horse riding etc. Here the adverse impacts would likely be greater than those in the open countryside and carry greater weight against any positive impacts.
- The policy needs a bolder, clearer statement that the loss of farmland from food production will be resisted. Diversification should be supported but primarily as a means of ensuring continued food production and only as a last resort to move into other land uses.
- Last bullet should be re-worded more positively, ""proposals provide for the retention of hedgerows and trees and improvement in biodiversity"".
- A further bullet - that any diversification are to have no impact on existing views of hill-sides, AONB and ridge lines.
- A demand for new Employment development on Farms must be demonstrated to avoid this land being used for residential purposes by default.
- There is potential conflict with the rural workers accommodation policy in so far as rural farm accommodation could be used as holiday accommodation under a diversification application and this should be controlled.
- Alternative methods of food production that keep emissions of greenhouse gases to a minimum should be encouraged. Precision Fermentation could be a community-led way of sustaining the local populace but would need infrastructure such as energy and water to support it which need planning for.
- Encouraging diversification makes sense to allow additional income streams for farming businesses.
- Farm buildings should be retained for their heritage value and uses should be appropriate to this eg no unsightly scrap yards etc
- The picture accompanying this policy is not a farm.
- These are standard provisions to control this kind of development.
- The East Devon AONB team support the requirements that “the scale, siting and appearance of buildings and activities associated with the proposed development is appropriate to the rural character of the area and will not adversely impact local amenity” and “no adverse impact on the character of surrounding natural or historic environment”.
- Paragraph 1 is too restrictive in specifying use classes which could prevent additional and much needed income streams; the criteria in paragraph 3 will ensure proposals are acceptable. The policy should be worded more flexibly like current Local Plan Policy E4

Policy 54 - Resisting the loss of Employment sites

There was no question associated with this Policy on the Commonplace consultation webpage. Exmouth Town Council made a general comment that, in Exmouth, the existing policy relating to the loss of employment land has not proved effective and they have lost several employment land allocations in favour of housing development. More robust protection is needed; Clyst Honiton Parish Council believes that this policy may be too restrictive, as it could prevent villages from developing in a way that benefits their residents. Some villages have had unwanted employment sites for many years, and local people would like to see these sites redeveloped into housing. Keeping these sites derelict can harm the village's schools and local services, and the council is concerned that this policy could prevent villages from addressing this problem; Churchill Retirement Living supports the need to retain high-quality employment sites, but they have concerns about the wording of policy54. The term "employment" is not defined, and the preconditions listed in the policy are too extensive and time-consuming. They would delay the regeneration of previously developed sites.

Policy 55 - Employment and Skills Statements

- Devon County Council state reference should be made to the Skills Academy, aeronautical engineering opportunities and implications of moving towards Net Zero.
- The trigger is too high, should be required at much lower thresholds
- Clarification is required as to the type of skills and ensure they are inclusive
- Schools, colleges and HE providers need to be involved as well as employers
- What is EDDC's strategy for employment? How can a policy be written without the supporting evidence
- Further evidence is required, the policy is unsound. If there is a skills gap, it should either be a matter for the education sector to address or if there are training needs a matter for an employer to identify and address as they see fit.
- Imposing additional financial obligations relating to this requirement is yet another financial burden on development, resulting in the potential to reduce job creation and the opportunities naturally presented for informal on the job learning.
- This requirement is too onerous and too big a risk for the developer- eg the end users may be as yet unknown, there is no evidence that the end users will have either a skills gap or be feasibly able to deliver on commitments.
- This will create a disadvantage to developers in East Devon competing against sites in authorities without such requirements
- Jobs need to be created for local people, and not just specialist jobs to encourage more people into the region. It must start at local level first. The existing local workforce must

see an improvement in more and better skills training, the choice of jobs being made available, with an associated improvement of wages

- Let the market decide without any further interference.
- Important to support growing sectors, but unclear how the policy will do this
- Developers must adhere to the statements and EDDC take action to enforce them
- Apprenticeships are key- Skills in wood carpentry, thatching and farming in the agricultural area must be encouraged. Many skills have been lost.
- Independent and sustainable businesses should be the focus, to reduce commuting
- Over prescriptive, and far too complicated. The costs of implementing this policy will exceed any benefit.

Policy 56 - Town centre hierarchy, sequential approach and impact assessment

- Unsure how this will regenerate town centres.
- Support that out-of-centre sites should be accessible by bicycle and well connected to the centre.
- 'Edge of (town) centre' developments should only be allowed where it is shown there will be no adverse impact on the vitality and economic vibrancy of its nearby town centre.
- Prefer current policy.
- Object to inclusion of Hawkchurch as a Tier 4 settlement on transport grounds (only one bus per week) and concern that shop is reliant on volunteers and will be engulfed by the proposed allocation.
- This hierarchy seems wrong. Tier 3 centres vary considerably. Budleigh is fairly large. Lypstone has a train line. The other three settlements should be tier 4.
- The accessibility of edge-of-centre and out-of-centre sites on foot and bike needs to be such that anyone can use the provision rather than only being possible for those who are fit and able or confident enough.
- Exmouth town should be redeveloped as it has lost its historic character and is bland and run down. This could extend to celebrating maritime heritage on the seafront, restoring the arcade building and building a new swimming pool with hot tubs
- Independent businesses with a focus on sustainability need encouraging. Farm shops could be located in towns.
- Focus housing in the town centres (especially Exmouth) as an alternative to building on the AONB's/countryside
- Shop frontage and signs must also be kept in keeping with the heritage of the area as this too can have a negative impact on the area.
- Artisan markets and craft markets and farmers markets should be encouraged.

- Out of centre sites should be actively discouraged and policy should reflect this. A 'sequential test' is very unlikely to be robust enough to protect our town centres.
- The policy does not recognize the problems that our town centres face, the issue of adequate and cheap parking, and does not offer any hope for improvement
- Sidmouth Cycling Campaign support the policy that out of centre sites should be accessible by bicycle and well connected to the centre.
- Exeter Cycling Campaign would like 'by these modes' to be added after 'centre'. Currently this doesn't actually say that they should be well-connected to the centre by public transport, bicycle and foot. They can be accessible from some other point by all those things, but not necessarily the centre, so this should be explicitly stated.

Policy 57 - Town Centre development

- Devon County Council welcome this policy but suggest it is strengthened to ensure there is no overall erosion of critical mass of activity within its retail core.
- Devon Wildlife Trust advised the requirement for enhancement of the natural environment should be included within this policy. The provision of well designed, connected, diverse natural corridors through town centres can act as important flagship projects showcasing the benefits of the natural environment.
- Cranbrook town centre is poorly designed and doesn't really exist. It isn't clear where the shops are/will be and they aren't close to the station.
- Support the reference to shop frontages as it is consistent with the current SPD relating to Exmouth's shop front policy.
- Object to loss of retail premises to housing.
- The statement that change of use to residential will only be permitted if 'there is no demand for town centre use' should be strengthened. With an increasing number of businesses closing it would be good to see more positive proposals for invigorating town centres.
- Should Beer really be in this group?
- Exmouth Town centre lacks visual appeal. There needs to more character and are good examples of this are Sidmouth, and cities such as Bath.
- Rejuvenation (of Exmouth) is a must and to encourage independent, sustainable businesses rather than more hairdressers, charity shops and fast food outlets.
- This is a standard version of a long-established policy. The use of upstairs accommodation for residential purposes is greatly discouraged because many of our town centre buildings are listed or are situated in a Conservation Area, so alterations to allow occupation are very expensive and are often rejected.
- Exeter Cycling Campaign would like to explicitly mention the need to enable cycling as a means of transport, with prominence given to properly-designed and located cycle

parking. Towns like Honiton and Axminster currently have very few Sheffield cycle parking stands and these are often inconveniently located.

- Churchill Retirement Living supports the proposed Exmouth Town Centre boundary.

Policy 58 - Local shops and services

- Local shops and services overly restrictive eg no craft shop allowed
- Fully support, communities would be damaged by village shops closing
- Lack of footfall is not the main issue, viability and high running costs are leading pubs/PO's to close
- Local facilities reduce the need to travel, especially important in rural areas with limited public transport
- The policy is fine, but our planning team do not require evidence of lack of viability to be supplied, and certainly do not question that evidence. As is so often the case, it is not the policy but its application that is the problem

Policy 59 - Rural shops

- Local shops and services is overly restrictive (e.g. wouldn't permit a craft shop)
- Seems unlikely that the 30 mile radius policy would ever be enforced!
- Support this policy. Farm shops are good, but we need to develop town and village centres too.
- Need more sustainable retail including farm shops and shops that sell locally made items. Too much stuff is bought from overseas making this unsustainable.
- ED has a vast array of creators and agricultural farms that we must work together with. Darts farm and greendales are good examples.
- Increase farmers markets
- The policy used to be for a 60% requirement and this should be retained.
- Requirements have not been enforced. The large number of rural shops (especially selling non-local goods) collectively undermine existing town centres, where rates are paid, overheads are much greater and car parking charges are extortionate.

Policy 60 - Sustainable Tourism

- Devon County Council query how the loss of visitor accommodation policy will be applied to premises only recently begun to be used as visitor accommodation (e.g., Airbnb).

- Definitions are absent. Net Zero - does this mean on site or as part of the total visitor journey? (Exeter and Honiton are probably the most sustainable parts of EDDC but probably not what is meant by this policy). Improvements in public transport to access some areas would be required. How would it be achieved?
- Sidmouth TC - We welcome the proposed measures in the draft Local Plan relating to the change of use from hotels and guest houses. However, the serviced holiday accommodation sector is so important to the economy of Sidmouth that we would like to see these provisions strengthened so that change of use becomes a very last resort.
- Coast Meets Country Project - Response to Local Plan Consultation sets out a number of initiatives that the group are pursuing/supporting. It has not been possible to summarise this response here and so the representation should be read in full.
- If the sustainable tourism policy was applied 100%. then there would be no new tourist facilities.
- Support diversification of farms by providing tourist accommodation.
- Support protection of the AONB's by restricting further tourism development.
- Caravan sites such as Devon Cliffs are not sustainable due to their sheer volume and the increase stress on our local sewage works, infrastructure and Jurassic coastline.
- Discouraging hotels will increase second homes, Air BnB's etc to the detriment of local communities. Local communities will be 'hollowed out'
- The strangulation of the hotel industry across the district is very bad news for the wider economy and jobs, and has certainly undermined our town centres.
- The normal traffic access and visibility issues are dealt with adequately by normal planning policy and a specifically anti-car provision is not required in the Local Plan.
- Support retention of holiday accommodation, and especially hotels, but enforcement is needed to resist their loss. DM team need to apply the policy.
- Policy does not explain the anti-car and anti-hotel stance. Anti-car would seem to exclude towing caravans or anyone wishing to holiday in the more rural parts of the District...
- The Tourism Strategy is long on hyperbole and well-meaning policy statements, but has no practical proposals to improve the tourism offer.
- Caravans and campsites are encouraged (despite unsightly toilet blocks, shops etc) but not quality hotel accommodation.
- Disappointing that there is no appetite for encouraging cycling and walking by the signing of suitable routes. Need to capitalise on South west coast path.
- The East Devon AONB team welcome the inclusion of advice about the sensitive nature and importance of the AONB with restrictions on the erection of new buildings.
- Otter Valley Association are concerned that increasing year round tourism could harm the outstanding natural environment which draws tourists

- Sidmouth Arboretum suggest that the policy would be stronger if there was a specific mention of the mature trees and hedgerows that typify the surrounding natural environment of most of rural East Devon.
- Agents for Bourne Leisure advise that they endorses draft Policy 60 in principle, and welcomes the Council’s strategic vision for tourism, “that East Devon be the leading, year-round tourism destination in Devon”. The tourism sector is a significant economic driver for the area, and it is crucial that the Plan is supportive of investment and growth of the industry, with a positive approach to sustainable tourism development during the plan period.

Policy 61 - Holiday Accommodation Parks in designated landscapes

- Strongly support policy of not allowing new or expanded large holiday parks in sensitive coastal landscapes.
- Improvements to existing sites should be achieved through use of darker shade units and landscaping and increased tent provision as this is more affordable and lower impact on the landscape.
- The existing policy has not worked as existing large sites have continued to expand.
- Caravan parks have become too large causing visual harm in some cases.
- Existing sites have badly impacted the World Heritage Site and AONB, they should not be allowed to increase further.
- Why are caravan parks allowed and hotels are precluded.
- The East Devon AONB team support the advice and justification relating to designated landscapes
- Devon Wildlife Trust advise that they would like to see the policy reworded to to include for the requirement to deliver a minimum 25% biodiversity net gain to account for the impacts on these sensitive landscapes.
- Agents for Bourne Leisure object to policy they consider it unduly onerous and unreasonably restrictive for existing holiday parks, particularly, as the supporting text states, considering that “the majority of East Devon lies within one or more designated landscapes”. They consider the needs of the tourism sector and demands of tourists are continually changing, and it is important to cater for and adapt to these needs and demands in order to continue to attract visitors, increase the level of expenditure and support local jobs. Continual investment in holiday park accommodation and facilities is therefore required to attract new and repeat visitors and policy is far too restrictive.

Chapter 9 - Policy omissions from - Supporting jobs and the economy and vibrant town centres

- Are the economic development/employment policies intended to apply to agricultural development? The criteria do not seem to be a good fit, but there does not appear to be a separate specific policy for agricultural buildings and other development such as slurry lagoons. It is considered to be a significant omission if there is no policy to deal with such development which can have consideration impacts on the landscape and environment of the rural parts of the district, particularly the AONBs.
- No mention of promoting the agricultural/horticultural sector or supporting young people to continue working and living on farms.
- Tourism is vital for the area, but we do not want second homes. Sustainable and green tourism is good. Sites like Devon Cliffs are not.
- Retail and produce must be sustainable and where possible be locally produced and made. Independent shops and farm shops are a good example.
- AONB must be protected.
- Hill Pond, adjacent to Hill Barton Business Park should be allocated as an employment site. It is within single ownership, is available for development now and could be delivered quickly; It is an infill/rounding off site. The road to the west and north of the site would mark a clearly defined boundary to the employment development in this location; It is not within any protective designation related to landscape character and any development would be viewed in the context Hill Barton Business Park to the east and Yeo Business Park to the north and, when built out, the employment development immediately to the south; There is an existing access to the site via Axehayes Lane, which has direct access to and from the A3052. There is potential to form a pedestrian connection to the footway network within Hill Barton Business Park
- Support is given for allocating Land to the East of Liverton Business Park (Exmo 18). This is proposed for three hectares of employment use. This allocation will help the Estate to continue to deliver new jobs through its existing development of the Estate's adjacent Business Park. Notwithstanding our concerns, set out above, about the lack of settled evidence on the overall form of employment need, the location of Exmo 18 alongside existing and successful employment uses and its site adjacent to the most important town in the District strongly suggests that development of this land for employment can make an important contribution to the District's economy.

Chapter 10 - Designing beautiful and healthy spaces and buildings

General matters raised in respect of this chapter included

- The Environment Agency support the link between climate change resilience and green infrastructure with good design.
- A respondent commented - “I would prefer all new housing estates to enhance the environment by incorporating new hedgerows, tree planting, houses to all have swift bricks and solar panels, electric charging points, walking and cycling routes, environmentally diverse green spaces, good links to public transport”
- Design guidelines need to include measures to retain or provide new hedgerows and trees as well as to enhance these with planting of new appropriate species.
- View expressed - The majority of new build often fails communities because the houses are too small, small to non-existent gardens, too many houses on the site, grossly inadequate parking leaving residents frustrated and others annoyed because people encroach elsewhere. New sites need less houses to give people more space and more car parking, at least two spaces for every new house.
- A high number of additional comments flagging that recent developments have failed to deliver well designed buildings and places.
- New homes should make use of off-site volume modular building techniques.
- Developers and house builders must be far more rigorously monitored to ensure that they build well in the multiple unit market as well as in the elite up market sites.
- Green infrastructure and biodiversity enhancements, sustainable travel, modern heating, insulation, solar [power generation] should become the norm in all new developments.
- Developers must be held to account with building poor quality housing. Too many issues with new builds that cause more problems than they are worth. They must be built with character in keeping with the area such as farm style housing.
- Buildings with historical value must be renovated and not demolished because a developer would rather pull it down and build 5 houses on its footprint. Those that own vacant houses and leave them to rot must be penalised. Former Rolle College site and Goodmores farm are a prime example. Any buildings destroyed by fire, water etc that had an architectural or historical value must be rebuilt in a similar style.
- Otter Valley Association would like to see more emphasis on the value and benefits of good design, especially the growing evidence on the influence of design in the built environment on physical and mental health and well-being. Paragraphs 126 to 134 in the NPPF could be used to strengthen the design policies in the Plan. The OVA would like to see a more proactive and collaborative approach, which will engage with local communities effectively.

- If any new housing is to be built it must be high quality and in keeping with existing architecture (ideally using local materials and craftspeople), but modest in size in order to be genuinely affordable for working people who have grown up in the area and provide vital skills (nurses, teachers, tradespeople etc).
- It is imperative that it is environmentally friendly and developments are required to make use of ground source heat pumps, air source heat pumps, solar panels, water recycling, sustainable materials, natural planting and drainage solutions to protect the local environment. It is inexcusable in this day and age that developers can build new housing that avoids these measures and hastens global warming.

Policy 62 - Design and Local Distinctiveness

- The Environment Agency note the reference to the waste hierarchy as a positive but consider the plan could go further and embrace the circular economy. The circular economy may be a better way of committing to ways of reducing waste and reusing materials. In planning terms this can be particularly important when considering refurbishing or repurposing buildings rather than building new.
- Newton Poppleford and Harpford Parish Council are concerned that the policy uses terms that are subjective and not measurable. They also consider that: 'space' should include private rear gardens; developments of more than 5 homes should have variation in design detail, light pollution should be mitigated.
- Devon County Council support point 2 on the implementation of the waste hierarchy and recommend this is expanded to include the design phase.
- Devon and Cornwall Police suggest permitting proposals where they "have considered designing out crime principles and imbedded them into the design in order to reduce the opportunity for crime and anti-social behaviour".
- Much more could be said in the explanation on the importance of:
 - The influence of design on physical and mental health and well-being
 - Effective engagement throughout the design process and tools to achieve this (detailed in the NPPF and NPPG)
 - Distinctive design, providing a strong sense of place, and which is sympathetic to local character and history
 - Mixed use, legibility (encouraging ease of movement), public space and realm, inclusive and accessible neighbourhoods
 - The desirability of flexible / adaptable homes

- Home Builders Federation considers the policy wording should not be interpreted by decision makers as conveying the weight of a Development Plan Document onto the document types listed in the policy. The documents have not been subject to examination and do not form part of the Local plan. Requirements should be set out in sufficient detail to determine a planning application without relying on other criteria or guidelines set out in separate guidance.
- Home Builders Federation states that the NDSS are optional, and only to be introduced where there is clear evidence of need. EDDC will need robust justifiable evidence
- Housing Association planning consortium is concerned that there is no reference to the evidence base study that supports and justified the 'need' to implement NDSS as per PPG. Application of NDSS can undermine viability of affordable housing developments. Essential that NDSS are robustly viability tested.
- EDDC does not have robust ways to evaluate "high quality design". Guidance should be developed to assist developers and individual applicants in producing Design and Access statements that should be clear and simple.
- Devon Wildlife Trust would encourage EDDC to strive for more than 'to reduce carbon emissions over the lifetime of the development'. We recommend the inclusion of the requirement for the provision of net-zero homes within this policy and would like to see EDDC strive for carbon positive homes. The trust provides more detail on specific wording amendments they would wish to see made.
- Policy should make it clear that poorly designed developments will be refused.
- Development should allow for modern and innovative designs, so long as it is truly "high quality". Developers' standard portfolio of 4 or 5 designs carpeted across a large development should be resisted.
- Provision for low/no carbon energy as source of heating and lighting with appropriate external/internal storage to be built in at design stage. Solar generation or heat pumps should be integrated at build stage.
- Energy efficiency should be prioritised.
- Support for measures to reduce carbon emissions.
- Spaces between buildings can be as important as the design of the buildings themselves and provide coherent linkages across a wider area.
- Policy should ensure adequate gardens / outdoor space is provided.
- Support for measures to enhance biodiversity.
- Who decides what trees and hedges are worthy of retention? All trees and hedgerows are worthy of retention (unless diseased).
- Biophilial measures to be integrated as part of the design to be evaluated.
- There is evidence that living close to nature makes housing very popular and more valuable. Consider cavity bricks for nesting birds, trees, ponds, long grass and wildflowers, hedgehog highways, green spaces etc eg <https://www.barratthomes.co.uk/new-homes/dev001701-canal-quarter-at-kingsbrook>

where Barratts have worked with RSPB

- Support for minimum space standards.
- Well thought through, and so good to see design being taken so seriously. Good design means fit for purpose!
- Please ensure that EDDC is equipped to implement all the good intentions included in these policies and will follow through.
- Good design may mean NO street lighting in a rural setting. Light pollution should be kept to a minimum particularly where development is adjacent to dark areas eg of farmland or AONB.
- We support the intention to focus design attention on the most sensitive sites including allocations within AONBs or affecting a heritage asset and to address this by producing design codes for certain allocated sites and specific areas. The AONBs will be happy to work with the council on this. We welcome the retention/update of the existing local plan design policy (D1) (Blackdown Hills AONB Partnership).
- Sustainable transport should be integrated into new housing areas from the start.
- Exmouth Town Council Members commented that “high quality design” is very subjective and open to interpretation / in the eye of the beholder. Also, that Design and Access statements vary in quality but are often treated as a tick box exercise as part of the planning application process. Members support introduction of space standards but raised concerns about achieving this in the context of viability challenges by developers and increasing costs of building materials. Also risk that the same houses are built all over the country to the point where every new community is starting to look the same. As a result, the distinctiveness of places gets forgotten and communities lose their identity. Will design codes be produced by EDDC and will they have any legal status? Concerns were also raised about broader enforcement operations relating to the mitigation of noise, smell dust etc.
- Any new houses/developments should be built to passivehaus certification standard.
- EDDC should promote the construction of residential accommodation above commercial premises in or near Town/Village Centre. This would mean Town Centres not being 'dead' after 5pm.
- Housing development should be varied in size and tenure with affordable housing distributed over the site rather than clustered in one area.
- Suggestion that the policy wording is woolly, including terms such as worthy of retention, safe environment, necessary and appropriate street lighting, good levels of daylight.
- Request for the addition of a requirement for off-road parking spaces, with carports preferred to garages.
- Policy should include a requirement for integrated rain-water storage / retention.
- Concern expressed over combined sewer systems not being fit for the future – request to separate the processing.

- The East Devon AONB team supports the intention in paragraph 10.3 for the Council to provide design codes for sites allocated that lie within the AONB and other sensitive locations and the advice provided in Policy 62.
- National Grid request the inclusion of an additional criteria to ensure design policy is consistent with national policy, stating “x. Taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites”.
- Agents for Bourne Leisure set out that in line with legislation a Design and Access Statement should only be required for applications for major development and request policy amendment. They consider that the design criteria listed within the policy should not apply to all developments, as they cannot be met by all development types. For example, as caravans are not classified as buildings/development, it is not possible to meet the full requirements of this draft policy for this type of proposal. They also seek further refinement to plan policy in respect to matters relating to impacts from development.
- A developer recommends amendments to criterion 2 as it is not possible for developers to ensure future occupiers adopt sustainable waste disposal methods, so amend to state that development should include measures to promote the management of waste.
- A developer is unclear what is meant by ‘identify opportunities for design that minimises risk associated with climate change’.
- Clause 6 – no evidence has been provided to justify the requirement for these optional standards. So the policy is currently unjustified.

Policy 63 - Housing Density and Efficient Use of Land

- Devon County Council query whether efficient use of land also refers to renewable energy proposals of farmland, where there could be an option to utilise unused space on buildings.
- Comments calling for appropriate development density to safeguard gardens, outdoor space, and distance between gardens.
- Maximising site densities, which is an implication here, may create more units but unenviable living environments. People need space and privacy as well as good housing.
- Concern that increased density forces cars to park on the roadside.
- Comments suggesting that increased housing density to maximise use of land is not always a good idea as it can increase impact on the natural world, interfering with connectivity of animal movements.
- Sympathetic development in line with the existing build is what is needed.

- Design guides may be required to support design quality for higher density developments.
- I hope we will consider flats and apartments as part of this. As long as acoustic insulation is properly attended to, flats are a very pleasant option. They can provide bigger rooms, better layout and more pleasant living than a house on a tiny footprint.
- The Codes identified in section 63 assume that facilities such as bus/train services remain static (or improve) through time. Higher densities mean lesser provision of off-street parking and garaging. In the last year Stagecoach have reduced service provision to towns such as Ottery/Honiton/Axminster and reliance on using the car for journeys has been adversely affected.
- Some recent housing developments assume that residents will walk or cycle. With a higher than average proportion of elderly this assumption is erroneous.
- This policy is meaningless since conserving/ enhancing the character of the area and efficient use of land may be in tension as recognised in para 10.9; surely for each site both minimum and maximum densities are needed.
- Exmouth Town Council Members are broadly in favour of a minimum density standard but feel that a tiered system may be needed to reflect optimum densities in built up versus rural areas. Also, that the efficient use of land is potentially in opposition with environmental sensitivity.
- It was noted that there are unforeseen consequences with optimising housing density. i.e. extra pressure on already-stretched primary healthcare services! The impact of development needs to be borne in mind - not just how efficiently the land is used.
- Suggested need for a further consultation once the policy is further advanced.
- Minimum density standards for towns should consider the facilities and services of the town, not just the location with regard to transport. For example, Axminster has a limited number of services, shops and facilities, and those that there are, are severely underfunded or run purely on charity (e.g., the swimming pool). If a minimum density is set, then more funding and investment should be put into the town's facilities and services to meet the needs of the current residents as well as to facilitate further numbers.
- We have seen increased density as land prices have increased to ensure the development is financially viable, even though a developer does not need to build 'affordable housing' if the developer can prove to the District Valuer it is financially unviable.
- Play/community/allotment areas have been severely reduced over the last few years in size and increased density to meet the profit margin of c20%?? We do not wish to see high tower blocks, as per our British cities, which would not fit in with the East Devon landscape.
- All design codes should incorporate the policy guidance in the NPPF around irreplaceable habitats and urban tree cover.

- As a rule, the more 'rural' the environs, the less dense should be the development. All other things being equal, we want to see high levels of density, and this can be achieved with clever design, but lines of boxy housing closely cramped together in semi-rural, village edge locations, is not acceptable. Smaller sites with individual house design and reasonably sized private gardens can make development much more acceptable, and nice homes to occupy.
- Hawkchurch Parish Council - We note the wording of this policy has not been finalised but there is no reference to differential housing densities dependent on the location of the development. For example, distinguishing between town, suburban or more rural settings. This would be in line with national guidance and reflect what other areas do to address the acceptability of different densities and intensity of housing in different areas.
- Exceptions to minimum density standards should be allowed based on local characteristics.
- I fully support this policy and hope that it will be strictly adhered to. Too many sites in Lypstone simply have had one or two large houses built on them when they are capable of accommodating far many more much needed smaller dwellings.
- Home Builders Federation recommends that the policy provides appropriate flexibility to allow developers to take account of the evidence in relation to site specific conditions, market aspirations, deliverability, viability and accessibility.
- And need to consider policy in the context of other policies eg open space, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency, and parking,
- Often density standards impede good design. Density should be the outcome of detailed design process, not the starting point
- Implications of a Design Code requirement should be included in the viability assessment
- Design codes are resource intensive and add financial burden and potential delay to development as well as a burden on local authority resource. Wording requiring design codes for developments of ten dwellings or less in sensitive locations should therefore be reconsidered.
- Agents for FW Clarke - PPS3 had minimum density requirements. The NPPF does not. We object to the proposed setting of minimum densities. Not every single aspect of professional planning judgement needs to be set out in black and white.

Policy 64 - Display of Advertisements

- The policy is fine. It is all about enforcement, and strict adherence to protecting the look of the countryside, closely controlling illegal advertising, and being very conscious of distracting drivers.

- Needs to be in keeping with the area.
- Advertising needs to be controlled. Some town centres are devalued by gawdy and scruffy signage and there should be stronger measures to stop it.
- Again, please promote good design and creativity to commerce, with possible guides to avoid environmental degradation.
- General support for policy expressed by multiple representations.
- Exmouth Town Council Members are supportive of this policy but commented that there is no reference to the need for advertisements to be environmentally friendly - e.g. type of illumination.
- All [advertisements] should require planning permission.
- The policy should make it clear that advertising in rural areas and the AONB will not normally be acceptable.
- Lighting at night should be discouraged as it is a waste of energy, affects wildlife and spoils the night sky. The national adverts like McDonalds signs should also be controlled as they destroy the local character.
- Devon Wildlife Trust advise where illuminated, the type and level of illumination should reflect the general level of lighting in the area.' 'and must consider potential impacts on biodiversity' should be added to this statement.

Chapter 10 - Policy omissions from - Designing beautiful and healthy spaces and buildings

- None identified

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



PDF 7 of 10

Chapters 11 to 14

Pages 412-462

July 2023

Chapter 11 - Prioritising Sustainable travel and providing the transport and communications facilities we need

General matters raised in respect of this chapter included

- Despite the laudable policies relating to 20-minute neighbourhoods and high quality public transport, the Local Plan will still result in significant additional traffic leading to pollution and congestion, particularly in the western part of East Devon and in Exeter.
- The East Devon AONB team support the requirement for travel plans and assessments for proposals that “might generate substantive scale of additional vehicle movements” to take account of “proximity to environmental designations.”
- The Otter Valley Association would like to see more robust policies to reduce congestion and increase requirement for travel plans. If ‘back lane’ were closed to through traffic it would create safer spaces for walkers and cyclists.
- National Highways support the ambitions regarding sustainable transport and agree that the spatial strategy is fundamental to achieving modal shift, thus maintaining a safe and efficient transport network.
- National Highways suggest identifying the severance challenges caused by the M5 and A30 (as in the emerging Exeter Local Plan).
- Exeter City Council stress the importance of joint working with the City Council, Devon County Council and National Highways. This will need to ensure that appropriate transport provision is made to mitigate development impact and maintain the continued strategic functionality of the local and strategic highway networks. This will also help to ensure that Exeter can continue to play its vital role as the driver of growth for the wider area. They note that more strategic interventions may be required, particularly on the strategic road network. Ongoing discussions should feed into coordinated infrastructure planning and infrastructure delivery.
- New developments should be required to provide not just charging for electric cars but also secure and under-cover charging points (especially in multiple-occupancy dwellings) for electric bikes (not all electric bike batteries are removable).
- Clyst Hydon parish council is concerned that the EDDC local plan does not adequately address the issue of transport. The council specifically mentions that the plan does not:
 - Directly address the issue of commuting to work, particularly in more rural areas.
 - Make any plans for workspace development in more rural areas.
 - Discuss the rapidly changing work patterns, which are seeing more people working from home and part-time.
 - Address the needs of the ageing population, who are more likely to need peripatetic support for social, health, and domestic needs.

Policy 65 - Walking, cycling, and public transport

- Network Rail support the promotion of sustainable transport with the provision of safe and pleasant cycling and walking routes between services and facilities.
- Network Rail must be contacted if there is an increase in use or change to the environment of a level crossing – any increase in risk requires suitable mitigation.
- National Highways presume ‘20-minute neighbourhoods’ means an 800m walkable catchment, or a 10 minute walk to destination and 10 minutes back home – this could be made clearer.
- Devon County Council (DCC) suggest cross-referencing with net-zero policy and adding the need for easy interchange between active and shared transport modes by using mobility hubs.
- DCC note that 20-minute neighbourhoods align with the Devon Carbon Plan.
- DCC question the idea of a new community as it does not limit the need to travel and offer a genuine choice of transport modes.
- DCC state there should be more focus on sustainable travel in existing settlements.
- DCC is currently reviewing its policy on Park and Ride sites given the slow uptake of bus travel since the pandemic but support park and change sites on the edge of urban areas.
- DCC state supporting active travel and reducing unnecessary travel should be considered with regards to addressing the needs of people with disabilities and reduced mobility.
- The Devon Countryside Access Forum consider that prioritising walking and cycling links should be made clearer, and suggest wording to do so.
- Sidmouth Cycling Campaign support this policy which prioritises walking and cycling links in new development. However, this policy could be made more effective by defining the features of a “20-minute neighbourhood” that new development will have to incorporate. For instance, that community facilities, such as primary schools and shops, are within a 20 minute walk of all proposed housing.
- Clyst Honiton Parish Council warns that developers should not rely on public transport to justify their developments, as bus services are subject to change. The council recommends that developers assume that all new residents will use their cars.
- Need to include e-scooters and buggies in this policy.
- Cycle routes should link to train stations, so that train and bike journeys are possible.
- Our climate is not conducive to walking and cycling.
- Do not like 20-minute neighbourhoods as could lead to monitoring of people’s movements.
- Support policy, need to ensure it is delivered.

- This policy sounds great in theory but does not happen in practice as existing public transport networks are not adequate, unregulated bus system, uncertainty on CIL funding.
- Support the principle but the policy itself is vague for example, how does development incorporate a 20 minute neighbourhood, include greater permeability for walkers/cyclists, deliver national target of 50% active travel in urban areas.
- Housing industry organisation considers the 20-minute neighbourhood concept to be useful but also appropriate to consider the range and variety of development which could help a smaller settlement support more services. Policy is not sufficiently flexible.
- Also EDDC needs to work on making active travel and public transport quick, easy to use, well maintained, safe and available to all, and therefore more appealing than using a car.
- No reference to shared transport (i.e. on-street car club and bikes) which are already present in the west end.
- Support the principle of 20-minute neighbourhoods and the recognition that this may not be achievable in rural areas.
- Cycling is challenging in East Devon due to its hilly nature.
- Need much better public transport links – bus routes have been cut, and trains are unreliable.
- A cycle path should be built between West Hill and Ottery.
- Would like high quality public transport in West Hill.
- Need to prioritise the availability of high quality public transport.
- Need to define the features of a 20-minute neighbourhood such as community facilities.
- Need off-street walking/cycling routes to connect existing settlements, not just where development is happening.
- Need a network of dedicated cycle and walking routes between all main developments and employment areas (Greendale, Hill Barton, Clyst Sy Mary, Science Park etc).
- Strengthen policy to allow all children to cycle off road to school.
- Need more emphasis on rail transport including linking with the Airport and the new town.
- It needs to be made clear that the policy is geared towards residential development, rather than all new development, otherwise there could be conflict with the location of large scale employment which may not deliver a 20-minute neighbourhood.
- Larger developments should consider ultra low emission streets where vehicle movement is restricted except for public transport, disabled vehicles, delivery vehicles, local residents.
- Residents of the proposed new town will not likely have a 20-minute neighbourhood for many years if Cranbrook's experience is repeated.

- Even high quality public transport will not provide a suitable alternative to the car if people are still required to commute to work, for example new housing along the Exe Estuary will be car dependent, concentrating employment land on the western side of the district.
- Site assessments have not applied the 20 minute neighbourhood as criteria on distance to services is 1,600m rather than 800m.
- There is no definition of “larger scale development” or “smaller scale development”.
- There is no definition of “rural” and “urban” areas.
- Walking and cycling routes should be clearly signed.
- Facilities for active travel should be in place before homes are occupied so that sustainable habits are encouraged from the start.
- Delivery of this policy is just as challenging in urban areas as rural areas.
- Remove the last sentence as it will allow developers to not deliver this policy.
- This policy is not deliverable in rural areas with limited job opportunities and facilities.
- Do not restrict car use as many older people rely on cars for their independence.
- This policy contradicts the Local Plan proposals at Hawkchurch, which only has one bus per week and therefore new residents will be reliant on the car to access facilities.
- Support no development at Cowley but would like a cycle route to link with Exeter city centre, the Exe Estuary Trail and elsewhere.
- Enabling walking and cycling will encourage tourists and support the economy.
- Promote the South West Coastal Path.
- Cyclists, pedestrians and cars should be segregated where possible, but this should not be at the expense of any of the three.
- It should be possible for people to live in town centres without needing a car, by improving town centres and/or providing good quality public transport.
- Bus and train services have been reduced following Covid, meaning the car is essential in many cases, so need a more robust approach.
- Losing all minor roads like Langaton Lane only makes some vehicle trips longer.
- Consideration should be given to links between towns, cycling plus increased tourism and traffic
- I believe that EDDC should be bold in its ambition. It should set out very strong DESIGN principles which actually demand that the policies in this plan are adhered to, by prospective applicants (developers), BEFORE the latter submit their applications for OUTLINE planning permission. Waiting to RESERVED Matters to implement policies is, in the vast majority of cases, too late.
- Agents for Bourne Leisure endorse draft Policy 65, which recognises that opportunities to deliver walking and cycling links and access to high quality public transport in new development will be more challenging in rural areas compared to urban areas

- The National Trust support policy and highlight relevance of Local Cycling and Walking Infrastructure Plans. The National Trust recommend that consideration is given to including the emerging LCWIP, which is being produced by Devon County Council, as an SPD.
- Exeter Cycling Campaign welcome the commitment to “Protecting transport sites and routes” in the draft but these are largely leisure routes. To deliver a modal shift away from private vehicles the Local Plan should enable a network of new, safe cycle paths that connect up settlements in East Devon to enable journeys for commuting, retail and education purposes, following Department for Transport design guidance and be designed for desired commuter levels (where 50% of journeys are by foot or bike). This is especially important for the proposed new town.
- The proposed Infrastructure Delivery Plan should give prominence to cycle, walking and bus connections to the new town, and the final choice of location should take into account the public transport options including access to train stations
- The Local Plan would benefit from proposing adding a new commuting cycle route from Axminster to Seaton (the nearest station).
- Policy should be more specific and firmer, for example:
 - a. Walking and cycling paths will have priority across all side roads in new developments, and signalled crossings of major routes will be of single phase.
 - b. 20 mph speed limit will be the default design (both with signage and road layout) in all new developments.
 - c. Cycle parking shall be designed to be more conveniently located than car parking in residential, retail and educational developments, and should allow for the charging of e-bikes.
 - d. Cycle parking numbers will meet or exceed LTN 1/20-specified numbers
 - e. Cycle parking design will meet LTN 1/20 standards (e.g. will accommodate non-standard bike forms, be secure, be sheltered, be of Sheffield-stand design)
 - f. To meet the policy statement that walking and cycling links should be “coherent, direct, safe, comfortable and attractive”. It should be a requirement for all new developments that they are connected up to the cycle network.
 - g. Permeability of developments should be higher for those on foot or travelling by bicycle, and this permeability should be maintained across independent developments. For example, in Cranbrook there have been issues where obvious links to networks etc are outside of the planning boundary, so it's too late or difficult to make links better into the development.
 - h. For commercial and employment developments, cycle access and parking as well as showers, lockers should form part of the application to enable those arriving by bicycle to do so safely and conveniently.

Policy 66 - Protecting transport sites and routes

- National Highways would like discussions and further evidence regarding the bus priority route at A3052/A376 to M5 Junction 30; and park and areas of search at A30/Heavitree Road corridor, and A376/A3052 Clyst St Mary corridor; due to their interaction with the strategic road network.
- Devon County Council support recognising these routes and protecting them from other development.
- There appears to be an omission in Policy 66 (Protecting transport sites) where there is no commitment to improving existing or adding new train stations.
- Support this policy, let's make sure this happens.
- Explain relationship between Devon County Council and EDDC and complexities of widening transport choice when privately owned bus companies are involved.
- Unclear on what the policy is trying to achieve, cannot understand criteria for specifying some strategic cycle schemes and not others – for example, why is Exe Estuary Trail not listed?
- Exmouth Town Council seek protection of Bapton Valley Park as an evolving walking/cycling route in Exmouth.
- Exmouth Town Council highlighted a local campaign to protect Summer Lane for active travel.
- Exmouth Town Council seek protection of the area around the train station to enable the delivery of an integrated transport interchange.
- Need to protect the cycle route from Knowle to Exmouth, it is enjoyed by many and under threat from Exmo_17 proposal.
- Strongly support the creation of cycle route between Feniton and Sidmouth, as referenced in the Ottery and West Hill Neighbourhood Plan.
- Strongly support the creation of cycle route between Sidford and Sidbury.
- Need a safe cycle route between Seaton and Colyton, as roads from Colyford entrance to Seaton Wetlands and Colyton are very dangerous.
- Extend the Seaton to Colyton cycle scheme to Axminster as this is a common route for commuters.
- Sidmouth Cycling Campaign support this policy
- Have not mentioned all the Sustrans cycle routes, and the international “Trans Manche” route.
- The Clyst Valley Trail is years away from being delivered so should not be protected.
- Query why the cycle route from Cranbrook to Treasbeare to Exeter has not been protected – does the Clyst Valley Trail include this?
- The Boniface Trail is also partly within East Devon so should be added to the policy.

- Promote duelling of the railway line and/or passing loops to enable a more frequent service.
- Restore Seaton Junction station so it can be redeveloped.
- Need a new light rail link between Seaton Junction and Colyton, then onto Colyford and Seaton shared with the tram.
- Re-instate light rail link from Feniton to Sidmouth, to connect Sidmouth, Tipton and Ottery back to the rail network.
- Redevelop the railway from Exmouth to Exeter to enable it to function as an attractive commuter route.
- Bus priority routes assume there are sufficient, reliable, affordable buses which is not the case.
- Allocate a park and ride facility in the north of Sidmouth to cater for additional day visitors causing congestion and lack of car parking.
- Park and Rides sites will need electric vehicle charging points.
- An 'urban tram' is required that runs directly from Park and Ride to central Exeter.
- Owner of land on the A377 corridor, Cowley has submitted land and supports its allocation for a Park and Ride site.
- Exmouth Town Council note the potential for a Park and Ride at Sowton to serve Exmouth has been overlooked.
- Typo as "A4052" does not exist, should state "A3052".
- The National Trust supports the protection of sites and routes that promote sustainable travel, including the Clyst Valley Trail. It would be beneficial if further details could be set out with regards to the Partnership working with Exeter City in respect of the Clyst Valley Trail that are required to ensure connections to the wider active travel network.

Policy 67 - Travel Plans, Transport Statements, Transport Assessments

- National Highways expect transport evidence to inform the thresholds.
- National Highways suggest the policy contains an option to require a transport assessment/travel plan outside any thresholds if necessary, to ensure unforeseen developments that could have transport implications to be addressed.
- Devon County Council state such supporting documents for developments of a reasonable size and nature are standard requirements. Travel Plans raise awareness and provide opportunities for people to change to more sustainable travel modes.
- This is a good policy, support.
- Travel Plans should encourage people out of their cars and onto the railway, as well as encouraging walking and cycling.
- Support this policy but note that new settlement Option 1 does not comply as it very remote with no public transport.

- No new housing should be built without significant improvements to public transport.
- Bullet point 3 should be separated into two bullet points.
- Exmouth Town Council (ETC) support setting thresholds but these must be evidence-based.
- ETC concerns about limited scope to influence public transport providers.
- Need to ensure transport statements/assessments meet local need and are produced to a minimum standard as they often inaccurate and misleading.
- Sustainable travel needs to be incorporated in new development from the outset to ensure residents use active travel and not cars.
- It is not possible to forecast the amount of vehicle movements that will be generated by a development.
- Exeter Airport Ltd state the policy is imprecise and should include provisions that will apply to development that may give rise to unacceptable impacts irrespective of thresholds.
- Policy is misleading as does not thresholds on the size of development before transport is considered.
- Policy is not robust enough; it needs targets and detail on monitoring to ensure aspired levels of sustainable travel are achieved.
- Cars are necessary in rural areas so road network should be improved to cut travel times.
- Transport assessments assume bus services will be the same when development has finished which, given cuts over recent years, should not be the case.
- The extra number of vehicles assumed in new development feels too low.
- Bullet point 3 should be 2 separate bullet points:
 - Proximity to environmental designations
 - Impact on promoting walking and cycling
- Exeter Cycling Campaign have concerns about the efficacy of “Where development schemes generate substantive additional vehicle movements...planning permissions will not be granted...unless a Transport Assessment and Travel Plan identifies measures to secure new sustainable travel arrangements”. Travel Plans and Assessments in new housing developments are often ineffective at nudging people away from using their private vehicle for all journeys, however short.

Policy 68 - Parking standards

- National Highways generally agree with this policy but require further information with regards to a non-residential parking standard, to ensure parking provision is appropriate to reasonable trip generation assumptions in the transport evidence.

- The Environment Agency recommend this policy should also provide for expansion of EV charging points for existing communities to ensure sufficient infrastructure is in place as society transitions to EVs. This could perhaps include a presumption in favour of new EV charging proposals.
- Devon County Council state each site should have its own parking standards – rural locations will require additional parking spaces, with lower provision in urban areas where there are good sustainable alternatives.
- Devon and Cornwall Police suggest considering designing out crime principles when designing parking provision in new development, for example avoiding large rear parking courts in preference to on-plot parking.
- Lyme Regis Town Council support measures to deliver EV charging but would like reference to need to retro fit or provide community facilities.
- Requiring 1.6 parking spaces for each house assumes car travel will be the norm, so likely to increase CO2 emissions.
- Clyst Honiton Parish Council is concerned that the current parking standard of 1.6 parking spaces per dwelling may not be sufficient, due to narrower roads and unusable garages. This could lead to cars being parked on pavements or too close to each other, which could have health and safety implications.
- Sidmouth Cycling Campaign support the inclusion of a cycle parking standard in this policy, but suggest it is separated from the car parking standards paragraph. We also recommend replacing the requirement of 2 cycle parking space per dwelling with a reference to the requirements of LTN 1/20. Table 11.1 of LTN 1/20 suggests a minimum requirement of 1 secure space per bedroom. This table also provides guidance on parking standards for non-residential development, which should be referenced in this policy. Provision should also be made for charging e-bikes in residential developments.
- All new housing should make provision for electric car charging points.
- Install electric car charging points in all car parks and explore opportunities in other public spaces.
- Housing in rural areas should have off-road parking for at least two cars, especially with the increase in electric cars.
- No need for policy as included in Part S of the Building Regulations (including where exceptions may apply).
- Flexibility to parking standards based on site location should be kept as in adopted policy TC9.
- Policy should breakdown provision for dwellings to provide clarity.
- A developer states the policy lacks clarity and needs more detailed parking standards which provide a suggested bedroom tenure/car parking spaces breakdown.
- The Avenues Residents Association (Exmouth) advise - Pol 68 appears to be incomplete. The Plan needs this section to be completed properly. The wording used

here is very weak and the Council should be doing more than "liaising", they should provide policy for operators to work to!

- Exeter Cycling Campaign state parking policy needs to be strengthened for cycle parking standards. The Local Plan should commit to the national guidance minimum cycle parking numbers laid out in LTN 1/20 of one cycle parking space per bedroom rather than the proposed 'per dwelling'. The local plan should mandate that this cycle parking must meet LTN1/20 standards for design, convenience and minimum numbers.
- The proposed car Parking standard is too low for East Devon, especially for rural area. And some comments suggest it should be more flexible to reflect the different needs of different areas and household.
- The policy could be seen as an important way to encourage people to use public transport or bicycles instead of cars.
- More EV charging points will be needed across the district, in order to encourage people, switch to electric cars.
- Car parking standard should consider the subsequent for the on-street parking issue in East Devon.
- Provision of electric vehicle charging points duplicates Building Regulations so does not serve a clear purpose. Should delete from policy.

Policy 69 - Rear Servicing of Shopping/Commercial Development

- Support policy as it will ensure a much better experience in town centres.
- Exmouth Town Council (ETC) support this policy, particularly important for pedestrianised areas such as the Magnolia Centre in Exmouth.
- ETC consider that different methods of distribution may be popular in the future such as cargo bikes, rail freight, electric vans so policy should support alternative, environmentally friendly delivery methods.
- Agree with policy as it's not fair for delivery vehicles to get parking fines when they are only trying to do their job.
- Reasonable ambition but rarely practical.
- Do not agree with removing the ability for town centre shops to receive deliveries, particularly with centuries-old streets and layouts.
- Need to clarify whether the policy applies to all Class E uses or just shopping and commercial development.

Policy 70 - Safe vehicular access to sites

- National Highways generally agree with this policy but it should be noted that access affecting the strategic road network are also informed by DfT Circular 01/2022 and must comply with the Design Manual for Roads and Bridges.
- Sensible policy.
- Support this policy, which should be applied to the proposals at Hawkchurch to build 38 dwellings on a narrow lane.
- Several respondents, including Exmouth Town Council consider that the term “safe access” is subjective – who will determine this? Devon County Council often issue standing advice, refer to statutory guidance, or not comment at all.
- Whilst Highway engineers may like space for two bin lorries to pass, Poundbury shows how access can work without adverse impact on the urban environment.
- Safe access is important but also need to consider how traffic impacts can be reduced.
- Safe access should be considered near schools.
- Add pedestrian and cycle access to the policy to ensure they are given greatest weight.
- The impact of access traffic upon other local road users should also be considered.
- Road widths need to increase as roads are clogged with parked cars, making it difficult for emergency vehicles to pass through.
- Question the need for this policy as it unnecessarily reiterates NPPF para 110b.
- This policy should explicitly include the need to ensure safe access for electric and human-powered vehicles. This is the future that we need to be building.

Policy 71 - Aerodrome Safeguarded Areas and Public Safety Zones

- Exeter and Devon Airport Ltd (EDAL) support this policy and will support the Council to ensure it is fully and consistently applied.
- EDAL consider the policy should be amended to state development which would impact on the operation of safety or navigational systems at the Airport must provide suitable mitigation, for example funding for system upgrades.
- This policy is used by the airport and developers to limit the delivery of solar PV panels, which is too restrictive as there are very few flights, warehouses are planned on the edge of the Airport, and the runway is culverted at Clyst Honiton.
- Good to protect minor airports such as Dunkeswell which still provide lots of low-level infrastructure.
- Exeter Airport should be closed and redeveloped as housing – an airport should not be included in a carbon neutral plan.

- Welcome policy 71 on aerodrome safeguarding but need to consider safeguarding of Exeter Airport in all allocations, including for the proposed new town.
- Clyst Honiton Parish Council has expressed concerns about this policy.

Policy 72 - Digital Connectivity

- National Farmers Union state Rural areas continue to suffer with a lack of connectivity (broadband and mobile), in the modern age this is a real barrier to business, resulting in a drag on efficiency. We welcome the recognition of the need for connectivity, but importantly this is not just for new development, there are large parts of the district which do not have an acceptable service so provision of new infrastructure to cover these 'not-spots' should be encouraged.
- Need flexibility for scenarios where 'superfast broadband' may not be feasible, for example in rural communities.
- The provision of 'sufficient mobile connectivity' is subject to service provision beyond the control of a developer and should be omitted from the policy.
- Exmouth Town Council Members support the policy but stressed the need for community resilience in respect of possible over-reliance on electronic communications.
- General support received for this policy, and numbers of comments pointed out the need of improvement on digital connectivity across East Devon.
- Policy should also cover the existing housing.
- Barratt David Wilson Homes - Policy requirement for new development to provide access to superfast broadband and high-quality communication duplicates the changed Building Regulations (changes came into effect 26 December 2022). This part of the policy does not serve a clear purpose – should be deleted

Policy 73 - Wireless connectivity and telecoms infrastructure

- Exmouth Town Council members support this policy.
- Private fixed broadband networks on new housing estates can limit residents' choices
- EDDC should pause 5G rollout due to health concerns, more research needed.
- Programme of extension of wireless connectivity and telecoms should consult local residents in advance.

Chapter 11 - Policy omissions from - Prioritising Sustainable travel and providing the transport and communications facilities we need

- The Local Plan would be improved with the addition of a planning policy which mandates that active travel infrastructure and public transport is in place and roads are adopted by DCC before houses are occupied so that bad driving/parking habits do not develop.
- Work Hubs: The Devon Climate Emergency Response Groups 'Carbon Plan' referred to 'work hubs' as one means of reducing the need to travel. The Local Plan should align with this and commit to work hubs as one means of decarbonising transport.

Chapter 12 - Caring for our outstanding landscape

General matters raised in respect of this chapter included

- The Policies in this Chapter were strongly supported. There were some requests for wording changes and minor additions but overall the policies were seen as very important to maintaining a high-quality environment.
- Numerous respondents supported the protective nature of the landscape policies but felt these were at odds with other policies of the Plan, particularly those supporting or allocating additional housing, employment or solar development. The sentiment was that these will inevitably lead to the loss of greenfield sites and will impact on the visual appearance and character of the landscape.
- Woodbury Parish Council submit nine maps showing where and how the countryside should receive further protection across the parish and beyond, by increasing public footpaths, quiet lanes, public open space, green wedges, public access woodland.

Policy 74 - Landscape Features

- The policy is considered to be important by respondents and most comments expressed concern that new development could be detrimental to important landscape features and/or suggested additional features to be included in policy.
- The East Devon AONB team support this policy.
- Devon County Council recommend the policy is amended to refer to “valued landscape attributes” and “special features and qualities” as evidenced in the Devon-wide Landscape Character Assessment.

More detailed points included:

- High quality landscape is vital to East Devon's economy, sense of place and at the root of wellbeing in the District. Protecting and enhancing must have a very high priority in the Plan.
- A number of respondents felt that proposals for new development undermine countryside protection policies.
- A large area of countryside will be lost to the new town and this was considered to conflict with countryside protection objectives.
- Disingenuous to suggest that developing greenfields will provide more green space.
- This policy should make clear that it applies to all proposed developments including land allocations and proposed development put forward through the LP.

- The landscape, countryside and rural area should be protected from light pollution and development detrimental to tranquillity.
- Need to refer to the Environmental Improvement Plan being published in Jan' 2023. Sitting at the heart of the government's Environment Act, its targets will include; to halt the decline in species populations by 2030, restore precious water bodies to their natural state; and boost nature recovery by increasing tree and woodland cover.
- Need to refer to the Plant Biosecurity Strategy published 9th January 2023. The strategy sets out how more than 30 signatories, including Defra, the Royal Horticultural Society, National Farmers Union and the Woodland Trust, will deliver an ambitious programme of behavioural change across society through the Public Engagement in Plant Health Accord.
- Climate change and protection of habitat should be prioritised
- The text refers to landscape appraisal/LVIA, it is suggested that further guidance be prepared on what will be required to demonstrate that a development will protect and enhance features.
- All High Distinctiveness Habitat should be strongly protected and not just trees and hedgerows or Irreplaceable Habitat.
- There is no need to include Best and Most Versatile Agricultural Land in this list given that it is covered by '83. Policy - Development on High Quality Agricultural Land'.
- Support protection of trees and hedgerows. Replacement will not compensate for loss of mature trees or ancient hedgerows.
- Concern that trees and hedgerows are removed without penalty, and that replacement/mitigation isn't properly monitored or enforced.
- Archaeological features should be referred to.
- Sites should not be allocated within the AONB's.
- Important lowland heath should be referred to.
- There is no commitment to control solar farm developments. Developers are taking advantage of the maximum size allowed before government approval required.
- Concern was specifically raised in respect of landscape features on, or around, sites at Littleham, Exmouth, Whimple, Colyton, Yarty Valley and the Axe Valley.
- Devon Wildlife Trust consider that the list of features that contribute to the nature and quality of East Devon's landscapes should be expanded to include wildlife corridors which must not be subject to impacts from lighting. Furthermore, the list should include 'the development must deliver a minimum 20% biodiversity net gain'. They also provide specific suggested policy wording amendments.
- A developer recommends criterion a) is deleted as it conflicts with policy 85 which priorities protection of certain trees rather than all trees; and sometimes tree removal can be beneficial.
- A developer states the provision of homes and employment carries substantial weight in the planning balance when considered against the lack of robust housing and

employment land supply in EDDC and across the subregion. This policy needs to be applied flexibly in recognition of this shortfall; this is especially the case in areas outside of the AONB which are less sensitive to change.

Policy 75 - Areas of Outstanding Natural Beauty

- Policy is well supported. Numerous respondents expressed concern about the quality/quantity and impact of new development on the AONB's.
- The East Devon AONB team support this policy and the justification paragraphs 12.4, 12.5 and 12.9 supporting local landscape character assessments and LVIA's but would encourage a clarification of how the setting of an AONB is considered.

More detailed comments included:

- The Blackdown Hills AONB Partnership welcomed the reference to AONB management plans and the AONB Teams are happy to work with officers to refine and develop the policy further. They request clarification on defining the setting of the AONBs, and also how it will be determined whether development proposals could affect the special qualities of an AONB.
- The National Farmers Union state within the landscape protection these areas are granted, it is vital that these farm businesses are allowed to develop where needed, in order to remain viable. Within this policy there should be specific provision for what agricultural businesses deliver for the AONBs in terms of landscape management and development that allows them to continue should have specific regard.
- Devon County Council state the third bullet point should refer to scope for mitigation and whether there is potential for significant effects to reflect the NPPF.
- Lyme Regis Town Council support protection of areas through AONB status but do not support national park designation for either East Devon or neighbouring parts of Dorset.
- A number of respondents felt that sites in, or impacting on, AONBs should not be allocated. Some additional comments said that no major development should be considered in the AONB and that this is not in the public interest and/or exceptional circumstances should not apply. Point 3 should make clear that major development should not be permitted within the AONB.
- Prominent new development, within and/or highly visible from, the AONB is not supported. Anything visible from an AONB must be rigorously analysed for visual impact prior to planning approval, as per latest govt. guidelines
- The Policy should make clear that it applies to all proposed developments including land allocations and proposals in the Local Plan.
- The landscape, countryside and rural area should be protected from light pollution.

- Several respondents said that allowing developments that impact upon the AONB on the basis of their economic benefit is not justified.
- Many areas outside AONBs are just as beautiful and being overdeveloped (Hawkchurch and Whimble were given as examples). These areas require protection too. AONBs should take a greater share of this rural development.
- AONBs need appropriate development to enable a mixed demographic, local employment etc. Limiting development in such areas produces a huge demographic imbalance and divorce young families from their extended families and support networks. This is socially damaging.
- Why do the AONB's have such a high degree of protection given their limited public access and a lack of public facilities.
- The Local Plan should allow absolutely no development beyond the settlement boundaries (eg Sidmouth, Sidford, & Sidbury) otherwise there is a real threat to the AONB. Recent developments on edges of towns have encroached on the AONB.
- There should be a review of the AONB boundaries urgently and additional land should be brought into the protection of the AONB where appropriate.
- The impact of the Levelling Up and Regeneration Bill currently going through parliament should be fully assessed before committing to damaging allocations in AONB's.
- All of the construction will cause adverse effects on the AONBs from increased emissions for the next 20+ years.
- Tourism is a major source of income to our area but developing the AONBs will deter visitors
- Monitoring development in AONB and enforcing conditions is important
- The AONB forms part of the UNESCO World Heritage Site along the Jurassic Coast and needs protecting from further development. The south West Coast Path is an important walkway for all ages and also needs its access protecting for future generations
- Accepting that some AONB development is needed, this should be sensitively designed small scale development rather than large housing estates of repetitive styles. Large allocations are not supported as more modest scale and higher quality would sit better within the landscape.
- Some representations referred to specific proposed site allocations, for example at Whimble, Colyton, Sidmouth and Exmouth. These matters will be considered as part of the site specific considerations.

Policy 76 - Coastal Preservation Areas

- The policy is well supported with a general opinion that coastal preservation areas should not be built in

More detailed comments included:

- The Environment Agency consider it would be good if the policy included an additional 'purpose' of the green wedges to help communities to adapt and be more resilience to climate change should be added.
- Devon County Council are not aware of the detailed assessment (paragraph 12.7) but note landscape character is broader than openness and views to and from the sea only.
- Coastal areas must be protected for wildlife as well as people - every effort should be made to make sure that marine and coastal wildlife is not adversely affected by changes (increases) in human activity - eg increased noise, lighting, movement or pollution of coastal area.
- Although public access is important, owners of dogs are frequently insensitive to the need to control them to avoid disturbance to species of biodiversity importance or to other non dog owners. This includes damage caused by dog fouling.
- Appropriate proposals for increased public access must exclude access that adversely affects existing homes and infrastructure
- Is there potential conflict between this policy and the rural farm diversification policy?
- The policy should be strengthened. Some housing allocations will destroy the openness to and from the sea and so should not be allowed. Has this been assessed?
- Anything affecting the health and biodiversity of the coast, as well as the views, should be included in its protection. Sewage, road and agricultural run-off should not be permitted to enter the rivers or sea.
- Concern that the scale of development proposed is going to cause sewage overflows onto all the surrounding coastal areas.
- The coast of East Devon is unique in its visual and geological form, it needs to be carefully managed and protected to ensure it continues to be a valuable attraction for visitors - as well as providing vital habitat for biodiversity.
- Visual openness is extremely important to those who wish to enjoy the coast path and country walks.
- A review is long overdue. Past errors, and intrusive development, should be corrected.
- Much of our coastline is protected by ownership e.g. the National Trust, but the need to prevent overdevelopment and inappropriate development is clear.
- It is unclear from the Policies Maps where the boundary of the CPA lies around the area of Seaton Hole. The mudstone cliffs must be protected as they are prone to collapse from above as well as from coastal erosion from below. Policy should recognise that water flows from above must be identified and managed properly as well as proper building controls ie risk assessment for proposed groundwork and heavy plant usage near these cliffs.
- Littleham brook (north of Maer lane) should be within the CPA. This whole area represents a significant and necessary floodplain for runoff for this side of Exmouth.

Policy 77 - Areas of Strategic Visual Importance

- The policy is well supported with numerous comments that views are important to local and District character. It was also noted that views were considered important in Neighbourhood Plan consultation feedback.
- The East Devon AONB team support the Policy but are unclear as to how these 'strategic' areas or view type have or will be identified and mapped and how they will be evidenced in respect of any particular development. They are happy to work with Policy officers to develop this Policy further to enable the key view 'types' or areas across the AONBs to be identified.

More detailed comments included:

- Several respondents refer to the need to prevent light, noise and/or substance pollution and enforce if necessary.
- EDDC must insist that areas of strategic importance are preserved. There should be no exceptions to this.
- An exception should be made for solar and wind farms which may impact visually on a landscape, but are too important to be turned down solely for this reason.
- The Blackdown Hills AONB Partnership would like clarity as to how the 'strategic' areas/views have been identified and whether they can be mapped and be evidenced in respect of any particular development. They recognise that views are a special AONB quality and are happy to work with officers to develop this policy further.
- Need clarity as to how these views are different to point j. in policy 74.
- Support reference to the study 'what makes a view' in paragraph 12.9, but need to clarify that it is Blackdown Hills AONB specific.
- Policies need to be strengthened and written specifically into Policy 32 to prevent future industrialisation of the countryside.
- AONB landscapes require particular protection and are of high visual importance
- The new town is contrary to this policy as it will cause light pollution, noise pollution, traffic pollution and a detriment to the enjoyment of the area.
- Anything affecting the health and biodiversity of the coast, as well as the views, should be included in its protection. Sewage, road and agricultural run-off should not be permitted to enter the rivers or sea.
- Development will damage landscapes even if visual impact is low.
- Specific views were referred to, including Woodland Trust's new woodland at Yonder Oak, Whimble and Littleham and the Maer Valley in Exmouth.
- Agents for Bourne Leisure objects to policy noting it refers to "key views and views of local landmarks" but without specifically identifying or designating them. Items a and b of

draft Policy 77 are particularly concerning, as a judgment will need to be made without any proper consideration at the plan-making stage. This will create inconsistent decision-making and will not provide certainty for applicants or the local community. Bourne Leisure requests that draft Policy 77 is removed from the Plan or is reworded to address the concerns. They also advise policy also references “cumulative impacts within views”. Existing development needs to be taken as the baseline for the built environment and provides the context for assessing new/additional development. Applications for extensions should not lead to the Council re-assessing the harm of existing developments, as this is the wrong starting point and may inadvertently rule out needed and sustainable development.

- Barratt Homes and Vistry object to policy wording, which fails to recognise that changes to views may not always result in a negative or adverse impact on that view.
- The effect of this policy would be to prevent the vast amount of development as Landscape Institute guidelines interpret any change as being harmful – therefore amend wording to ensure landscape has an appropriate weight in the planning balance.
- Policy should be applied flexibly, especially outside AONB's, in recognition of the shortfall in employment land (but also housing land) in EDDC and across the sub-region

Policy 78 - Green wedges

- The policy for protection of green wedges was well supported, however numerous respondents expressed concern that existing green wedges are being eroded and coalescence is already taking place/will take place as a result of proposed allocations.

More detailed comments include:

- Existing Green Wedges have been ignored while considering proposed development sites. It is contradictory to allocate housing in existing green wedges, especially where appeals have been won on the basis of the protective designation.
- The proposed policy is weaker than the existing policy, which should be retained.
- Green wedges aren't necessary. Landscape harm, the loss of recreational spaces, and harm to ecology can be addressed without the need for this blanket policy approach. Each application should be assessed on its merits and within these more sensitive areas they can be informed as necessary by landscape and visual appraisals and detailed ecological assessments. They can then be judged on the appropriate balance of harm and benefits.
- Development on a Green Wedge is likely to cause loss of agricultural land, impacting food security

- Development on a Green Wedge will have a detrimental effect on the wildlife and biodiversity of the area. Within GW's there should be at least 10 % net gain for biodiversity from pre development baseline, using the metrics set out in the Environment Bill (2021)"
- Sports provision in Green Wedges are likely to require lighting which will affect the flight paths of bats.
- The Policy should be fully adhered to there should not be any exceptions.
- Concern was expressed that some existing green wedges are not effective (as development is being allowed in them)
- Links between settlements, eg tree-lined cycle/footpaths are essential/are acceptable within GW's
- If Green Wedge land is lost then compensatory provision should be made on adjacent land.
- Important policy for the creation of place, identity, landscape, habitat, active travel and recreation opportunity.
- Smaller green wedges even within major housing developments, are crucial in providing access to open space and in their ability to protect existing habitats (hedgerows, trees) and to allow net gain on site
- Should have same status as Green Belt.
- Existing green wedges are not large enough to create a meaningful gap that separates settlements and should be much larger where possible.
- Green Wedges should provide wildlife corridors between and into settlements. Woodlands should have a 50m buffer from new developments and a target of 30% canopy cover in new developments. Existing trees, hedges and other bio-diverse habitats should be enhanced in new developments in order to allow for this permeability between sites.
- Development within green wedges should only be allowed in exceptional circumstances and then it should be minimal and not detract from the landscape.
- Neighbourhood Plans received a lot of community support for Green Wedges and these areas (eg Sidmouth-Sidbury, West Hill to Ottery St Mary and Beer to Seaton) warrant protection in the local plan. Urban sprawl should not be permitted in these areas.
- Additional Green Wedges are required. Farringdon (and other villages affected by the new town), Clyst Honiton, Cranbrook, Exmouth, Colyton, Sidbury, Sidford, Lypstone, around Woodbury Common and Whimble were specifically suggested as locations to be considered for new or additional GW's.
- Devon Wildlife Trust advise We would like to see the addition of a further requirement: 'Development within Green Wedges must deliver a minimum 25% biodiversity net gain'.
- Broadclyst Parish Council - The Council does not agree with the statement that development in Green Wedges will be supported if it cannot be located elsewhere, and that it would not compromise, individually or cumulatively with other existing or proposed

development, the integrity of the green wedge, either by diminishing its physical extent or through visual intrusion. The protection to land identified as a Green Wedge must be sacrosanct and upheld without exception.

Policy 79 - Land of Local Amenity Importance or Local Green Space

- The policy was well supported although some responses suggested that the terminology may need to be clarified.

More detailed points included:

- The Environment Agency comment that these spaces will be crucial in helping communities to adapt and be more resilient to climate change.
- Policy is ambiguous. Unclear it relates to green space “on the ground”, whether it is publicly-accessible or it relates to spaces between (and including?) buildings that are simply visible. It may duplicate Policy 77 and unclear whether it includes trees.
- Policy should apply environmental criteria in addition to visual ones and these spaces should include at least 10 % net gain for biodiversity from pre development baseline, using the metrics set out in the Environment Bill (2021)
- Don't want local amenities, prefer a more isolated lifestyle.
- LGS and LLAs are needed for human and biological protection.
- Maps need to be improved and policy should say the areas are under review. LGS and LLAI should be listed.
- Housing allocations threaten some of these areas eg Mear Valley and Littleham Fields at Exmouth, contrary to this policy.
- Neighbourhood Plan policies relating to LGS and LLAI should be referred to
- Devon Wildlife Trust advise We would like to see the addition of a further requirement: 'Development within LLAI or LGS must deliver a minimum 25% biodiversity net gain'.
- Broadclyst Parish Council - The Council does not agree with the statement that development in Local Green Space or Land of Local Amenity Importance areas, development will be restricted to those limited types of appropriate development set out below, unless very special circumstances can be demonstrated. Local Green Space or Land of Local Amenity Importance areas must be protected from development without exception or exemption.

Policy 80 - Contaminated Land

- The Environment Agency comment that the policy could specify that the purpose of the policy is to protect the water environment as well as human health.
- Exmouth Town Council and several other respondents agree with policy.
- How can you do this if you want to build everywhere?
- Should stop plan until current plan expires in 2030.
- Very happy with this chapter but will it be applied because contradicts a strategic site allocation elsewhere in plan.
- Policy does not recognise contamination from agricultural activity.
- A few respondents raised the need to consider decontamination of waste from low carbon technologies including batteries.
- Hundreds of acres will be contaminated by solar and energy storage companies when technology becomes obsolete – bonds need to be required by EDDC to cover future costs of contamination.
- Decontamination of land must be properly recorded and monitored.
- A Few respondents felt that brownfield development should be prioritised.
- New town is too close to landfill site and Hill Barton Business Park with its noise pollution and unpleasant odours and particulates.
- There is lots of contaminated land to the west of East Devon affecting Option 1 of the new town and bad smells which would affect the new town.
- Good aspirations but monitoring and enforcement are biggest issues.
- Harm to people needs to be considered properly, not just trying to build houses everywhere.
- Two proposed new town options are on landfill sites.
- Denaturing contamination would add to development costs and disincentivise brownfield development.
- Contamination of former Seaton gas works has not been fully investigated but nearby development has commenced.

Policy 81 - Potentially Hazardous Developments Notifiable Installations

- The Environment Agency support this policy.
- Exmouth Town Council and one other agree with policy.
- Battery energy storage systems are hazardous and need to be classified as such in the local plan.
- Support policy and should apply to pipes from waste to heat plants and high-tension power cables.

- Add to policy wording 'or adjacent land x metres'
- Who decides what is a health and safety risk and how great it is?
- Why build when it is dangerous to health? You don't have to build and build.

Policy 82 - Control of Pollution

- The Environment Agency are satisfied that this policy includes the basic elements we would want to see in a pollution control policy, particularly regarding pollution of surface or ground waters. However, the policy says that permission will not be granted to proposal that will result in 'unacceptable' levels of pollution. It is not clear how an 'unacceptable' level of pollution would be defined. The policy should be clear that new proposals will be expected to not cause pollution of air, land, or water and that any unavoidable impacts will be adequately mitigated. To address this the policy should require new development to be accompanied by a construction environment management plan (CEMP). The CEMP would need to cover SuDS and soil management during construction to avoid compaction and sediment laden run-off. Paragraph 12.29 states that 'possible pollution effects from proposed development can be a material consideration'. We recommend that this is amended to be less ambiguous so that 'can be' is replaced by 'are'. Paragraph 185 of the NPPF is clear that likely effects on pollution should be considered.
- Natural England recommend that this pollution policy is strengthened to recognise the importance of environmental assets such as clean water and air to the natural environment and local communities. Policy should seek to protect habitats from water-related impacts and where appropriate seek enhancement. We would expect this policy to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development and proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation or from agricultural development which can be damaging to the natural environment.
- Exmouth Town Council ask who defines acceptable levels and whether policy can be used to address issues with South West Water.
- Support policy.
- Several respondents queried the definition of what is 'acceptable'.
- How can you do this?
- Most important but developers are allowed to evade and SWW cannot refuse – EDDC need to protect residents by applying.
- Need to apply to battery energy storage systems and large agricultural units.
- This should be a top priority.
- Should be enforced.
- Too many properties are not connected to the mains sewers.

- No indication of what an unacceptable level of pollution is – all pollution is unacceptable.
- Need to consider, manage and minimise air pollution (traffic, solid fuel burning) noise pollution (traffic), water pollution (plastic and microplastic, sewage and farm waste) light pollution (streetlights, domestic lighting, commercial buildings).
- Battery energy storage systems are ecological disasters in the making and plan should assess.
- Can policy be used to address Southwest Water mismanagement?
- River pollution big issue in East Devon.
- Does item 1 include wood burning stoves?
- Needs to be stronger to address river pollution.
- Need to keep storm water separate from sewage.
- Should not allow developments near watercourses.
- Point 5 should refer to all insects, not just flies.
- There is no acceptable level of pollution.
- New town option 1 too close to Hill Barton, which already causes problems for residents.
- Where will sewage/drainage be discharged?
- Should not interfere and cause damage to humans and environment.
- Pollution should be barrier to development, including from additional traffic and affecting water environment.
- More air and sea pollution will be caused by scale of development proposed at Exmouth.
- Agents for Bourne Leisure endorse the principle of draft Policy 82, but requests that 'visitors' is added to the policy wording to ensure that adequate amenity protection is provided for visitors to East Devon as well as residents and the wider environment.
- Barratt Homes and Vistry feel that policy should be reworded because new development should be self-sustaining and should not be required to correct existing pollution issues.

Policy 83 - Development on High Quality Agricultural Land

- The Policy was well supported. There was an overriding concern that food production should be prioritised over other uses.

More specific points included:

- Natural England advise that soils should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. This policy could be made more robust by

requiring relevant development to incorporate a soil handling plan and sustainable soil management strategy based on detailed soil surveys.

- National Farmers Union state food security and securing the provision of an acceptable level of home produced food is critical for the nation and with future challenges and the impact of climate change this will only become more vital. Therefore support policy
- One respondent stated that, whilst no-one wants to see the loss of greenfields, given the need for housing the policy was as balanced as it could be.
- Conflict between areas suitable for high fruit/vegetable productivity (eg the very fertile low lying pebblebed soils) and suitability for solar farms. They should be protected for food production.
- High value cropping systems with minimal tillage should be encouraged to prevent silt entering rivers due to historic style ploughing eg Exe is being silted up
- Land management plans should be required to slow down water flow and enable capture of silt from eroding farmland. There seem to be few references to this in the plan.
- A number of respondents felt that there is no justification for loss of best and most versatile agricultural land, especially given the uncertainty of future food production.
- It is inappropriate to allocate sites in the Local Plan for development without undertaking a full assessment of the agricultural quality in terms of Grades 1, 2, 3a and possible 3b. Such an assessment will help the authority to determine if the benefits of the development justifies and clearly outweighs the loss of high quality agricultural land needed for food security.
- Grade 3b should be included as Best and Most Versatile. It is capable of greater output in times of drought and climate change than higher grades.
- No justification to develop any agricultural land apart from the provision of agricultural workers accommodation but only if unavailable on or nearby the farms.
- It is right that allocated development do not need to justify the loss of high quality agricultural land. Sites have been allocated due to the strategic benefits that can be delivered and should not therefore need to justify the principle of development relative to the quality of the agricultural land to be lost. This could otherwise unduly delay and overcomplicate the delivery of these sites, if not potentially prejudice their delivery.
- The policy is weak and open to exploitation. Greater clarity as to what “overriding need” means.
- Food security is as important as energy security. We may not be able to import the bulk of our food into the future.
- Include a section on rewilding/biodiversity net gain of 3,4 and 5 Grade land, and encourage eco-tourism. This forms part of the BNG mitigation hierarchy within the Environment Act 2020.
- Development allocations, and allowing solar farms, run counter to this policy.

- All existing agricultural land within the West side of East Devon, i.e. Farringdon, will be replaced by new houses
- C G Fry object to blanket prohibition that has not been evidenced. This risks delivery of development that will support the strategic outcomes of the draft plan. Should be redrafted to reflect NPPF paragraph 174 b.
- Barratt Homes and Vistry suggest that the requirement that development will only be permitted on the best and most versatile land where land of a lower grade is unavailable is ambiguous because it does not confirm the way in which the assessment should be undertaken.
- Broadclyst Parish Council - Policy 83, development on High Quality Agricultural Land is not supported. It is felt that the policy wording is too vague and that it offers too many opportunities to be overridden.
- Clyst Honiton Parish Council is concerned that the development of a new town will require the development of high-quality agricultural land. They believed that the environmental impact of developing this land should be carefully considered.
- The provision of homes and employment carries substantial weight in the planning balance when considered against the lack of robust housing and employment land supply in EDDC and across the subregion. This policy needs to be applied flexibly in recognition of this shortfall; this is especially the case in the western side of the District where development is clearly focused.

Chapter 12 - Policy omissions from - Caring for our outstanding landscape

- Calls for - new landscape protection areas to further defend our special place from more development. What about wider buffer zones to Woodbury common, protecting special views and nature corridors and designating green wedges
- Rewilding should be encouraged through policy
- Whereas many other planning authorities refer to 'blue corridors' in their local plans, there is no mention of these as such in the East Devon local plan.

Chapter 13 - Protecting and enhancing our outstanding biodiversity and geodiversity

Chapter 13 of the plan addresses biodiversity and geodiversity. There was a general picture of strong support for protection and enhancement of biodiversity in comments received, with some calling for stronger policies. Key general cues raised in comments were.

- The Environment Agency comment that the introduction to the chapter is a good start, but parts of the chapter and some of the policies seem disjointed and muddled.
- Exeter City Council stress the importance of joint working with the City and Teignbridge in respect of mitigating in combination impacts on European (wildlife) sites. In terms of addressing these impacts, the updated Joint European Sites Mitigation Strategy will be key.
- Devon Wildlife Trust are impressed with the breadth and detail provided within Chapter 13 'Protecting and enhancing our outstanding biodiversity and geodiversity' and applaud East Devon District Council for their commitment to exceed minimum national levels with regard to biodiversity net gain.
- Protection should extend to gardens
- New development should incorporate nest boxes for birds ie Swift bricks, House Martin nest boxes House Sparrow boxes a Super Highway for Hedgehogs to obtain access to gardens at night perhaps some hidden areas for them to sleep during the day.
- I also believe wild area with a good pond also Bat roosting boxes perhaps also a Kestrel nest box or two.
- Some native trees of course and hedgerows.
- Any new housing developments would be a marvellous opportunity to create a wildlife friendly eco system area, all you have to do is create the spaces and the creatures would colonised it over time.
- There is no provision for animals to migrate through urban areas. Connectivity is vitally important for biodiversity. If each site is assessed on its own, the effect will be to isolate populations which will lead to eventual annihilation.
- Credible checks should be put in place to ensure that required mitigation/habitat provision is delivered as part of/alongside development.
- Developers should be held accountable for adverse impacts.
- A respondent advised a tree does not become carbon neutral until it is 27-34 years old (EU research) so any tree negatively impacted by development or pollution cannot be carbon offset in time for East Devon to become carbon neutral by 2040.
- A number of respondents commented on the challenges and failures of translocations.
- New planting should be in keeping with natural habitat.
- There was a call for a green doughnut economy.

- A number of respondents were concerned about whether there was a real commitment to biodiversity or whether policies would or could be enforced in practice and whether development with adverse impacts may occur regardless. There were cases where representations cited past decision on past planning applications where they believed policies had not been applied.
- A respondent suggested it was “*greenwashing*”.
- Concern was expressed about the Council having sufficient resources to apply policies, ensure they are enforced and for monitoring.
- A developer states that if development incorporates sufficient open space to offset any recreational impact, it should not be refused.

Policy 84 - Protection of Internationally and Nationally important wildlife sites

- The Environment Agency are concerned that the policy refers to ‘areas secured as compensation for damage to an internationally or nationally designated site’ and that it is not clear how broad the definition is and whether it would include areas like the Clyst Valley Regional Park, which have been identified as Suitable Alternative Natural Green Space as well as Environment Agency schemes such as the Lower Otter Restoration Project.
- The Environment Agency support the provisions for the protection of wildlife sites but point out that the terms ‘Habitats of Principal Importance’ and ‘Priority Habitats’ are the same thing and suggest that one term should be used to avoid confusion.
- Natural England advise - Internationally and Nationally Important Sites Point 3 – suitable measures should be secured rather than proposed. Point 4 - 20% BNG is not appropriate in this context as any mitigation or compensation requirements required for statutory designated sites should be dealt with separately from BNG provision. Ecological relevance and connection to the affected site would be better added to Point 4 for Regionally and Locally important sites. The policy should refer to Habitats of Principal (not Principle) Importance.
- Agents for Bloor Homes:
 - The first part of the policy relates to internationally and nationally important sites so the first sub-heading needs to be amended to reflect this i.e. reference to locally-important sites should be removed from the sub-heading.
 - Reference is made to biodiversity net gain for impacts to all Wildlife Sites. It is considered that this duplicates policy requirements set out in Policy 87 – Biodiversity Net Gain, and should therefore, be removed.
 - Proposed avoidance, mitigation and, as a last resort, compensation measures for impacts to designated sites (refer also to Paragraph 2.4 below) should ensure that the integrity of

these site is maintained and significant harm avoided e.g., in relation to the Conservation Objectives for National/International Wildlife Sites such as SACs, SPAs or Ramsar Sites, or the 'Favourable Condition' of sites such as SSSIs. There is no requirement to achieve a net gain for these sites, either in the National Planning Policy Framework (NPPF), legislation or elsewhere.

- The application of the ecological mitigation hierarchy for impacts to National/International Wildlife Sites such as SACs, SPAs and Ramsar Sites should be amended to reflect the due process that it required under the Conservation of Habitats and Species Regulations 2017 (as amended; the 'Habitats Regulations') for ensuring that the integrity of these sites is maintained.

- Habitats of Principal Importance (note Principal spelt incorrectly in the Policy and at other locations in the Consultation Local Plan) have been included in this Policy. These are not Wildlife Sites and it is considered that these habitats should be addressed through inclusion under Policy 85 to ensure a clear and consistent approach.

- Devon Wildlife Trust advise ...suitable biodiversity net gain of at least 20% is proposed' is repeated twice within this policy. We would like to see this strengthened to '25% is required'.
- Criteria in policy supported – though one responded advised they have been overridden in respect of solar energy and battery storage.
- In respect of point 2 in policy concern that loss should not happen under any circumstances – noting that many habitats can't be replaced (or take very long times to establish).
- Considered that policy needs to be rigorously applied.
- Concern that developments next/near to designated sites can cause harm and needs to be carefully controlled, including in respect to adverse impacts from occupants after construction.
- Development should not happen on or at designated sites,
- Policy supported but should include local wildlife sites in neighbourhood plans.
- Energy efficiency is more important than perceived appearance. I'd rather we produced ugly houses that were warm, dry and easy to live in, that visually acceptable ones that require huge energy to heat them and keep them dry. In practice it's rarely an either/or.
- Who decides what trees and hedges are "worthy of retention"?
- Yes to minimising energy needs.
- Yes to space minimum standards.

Policy 85 - Protection of irreplaceable habitats and important features

- The Environment Agency think that the wording of the policy should either be simplified to just refer to 'Habitats of Principal Importance' or the list of habitats expanded to

include: Intertidal mudflats; Rivers and Streams; Estuarine habitats; Coastal and floodplain and grazing marsh; Broadleaved mixed and yew woodland; Traditional orchards; Lowland heaths and Maritime slopes and cliffs.

- The Environment Agency suggest that more emphasis should be given to restoring and expanding the habitats through partnership working and community projects.
- The Environment Agency highlight the importance of data gathering and monitoring of the condition and distribution of the habitats for ensuring their ongoing protection.
- South West Water support the policy but want water habitats included within the protections proposed, including seagrass.
- Devon Wildlife Trust advise we would like to see a requirement for habitat replacement to be in line with the most recent DEFRA biodiversity metric in order to compensate for the time taken for these habitats to establish.
- The SVBG would like to draw attention to the fact that ancient and veteran trees are included in the definition of irreplaceable habitat within the National Planning Policy Framework – making it all the more important to protect and enhance the distinctive network of hedgerows and hedgerow trees throughout the District.
- Policy is supported but needs enforcing.
- Hedgerows should be incorporated into development schemes and afforded greater protection.
- Agents for Bloor Homes - As set out above in Paragraph 2.5, Habitats of Principal Importance should be addressed by this policy.
- Care needs to be taken that trees and hedgerows are not cut down over night as has happened in the past. Could go further by emphasising the penalties for wilful destruction.
- Policy should refer to protection of water meadows (and other habitats).
- Positive that damaging impacts of light pollution are referenced in policy.
- Concern that policy is not strong enough – the Exmouth Wildlife Group commented that the hedgerow element was lacking in clarity and is dated and could stipulate the retention of a certain (as yet unquantified) metreage of hedgerow in proportion to either the number of houses being built or size of development.
- It should be acknowledged that there are instances where hedgerow removal cannot be avoided, such as needing to access a development site.

Policy 86 - Habitats Regulations Assessment

- Natural England support the aims of this policy. It should be noted that some intertidal land being created as part of the River Otter Restoration Project (LORP) will be designated as “6. Areas secured as sites compensating for damage to a European site” within the lifetime of this plan. It is suggested that much of the policy wording around the

South-East Devon European Sites Mitigation Strategy (SEDESMS) could be moved to the justification.

- Natural England considers the policy restricting development within the pinch points protecting Beer Quarry and Caves SAC to be overly restrictive. Only development which would restrict bat commuting e.g. by removal of hedgerows or trees, or by artificial lighting or wind energy development could cause an adverse impact on bats. We recommend removal of the words “planning permission will not be supported for any development proposals within the pinch points, and” but retaining the rest of the policy.
- Natural England highlight that it is important that the reasoning behind the 400m zone around the East Devon Pebblebed Heaths SPA is fully explained – it is not and never has been solely about predation of ground-nesting birds by cats, but the restriction is also necessary to reduce direct recreational pressure and dog related impacts. For this reason, tourist accommodation should also be restricted within 400m. This revised wording is required to be consistent with SEDESMS.
- Natural England advise that in addition to mention of pinch points affecting Beer Quarry and Caves SAC, policy justification para 13.34 should also refer to the published Beer Quarry and Caves SAC Guidance and this document should be added to the Plan’s evidence base.
- The Environment Agency support the approach set out in the policy and hope that work on the Axminster Nutrient Management Plan and new initiatives will help to provide solutions.
- The Environment Agency strongly support the approach set out in the supporting text that the Council will assess development and encourage measures to protect and where possible enhance water quality. However, given the specific pressures in East Devon, the agency would encourage a specific nutrient management policy that links potential for funding of upstream river restoration delivering phosphate stripping to achieve this. The Agency advocate a consistent district wide approach, drawing on experience gained from the Axe catchment, to see developments across East Devon offsetting their foul effluent derived nutrient inputs whilst at the same time achieving environmental betterment and net gains for nature.
- In terms of the requirement for water efficiency measures, the Environment Agency are concerned that as currently written, the impression is that this is about water quantity rather than quality and suggest re-writing so development need to achieve nutrient neutrality not just wastewater minimisation.
- Devon County Council would like to discuss this policy to ensure the council is aware of the input that we can provide on planning applications in the River Axe SAC catchment.
- South Somerset District Council welcome the policy and recommend that the plan includes a reference to adjoining LPAs that are also impacted by the issue.
- Comment raised that the River Axe SAC is under particular threat from phosphate run off and it is unclear what measures EDDC is allowing to offset nutrient neutrality.

Mitigation measures need to be guaranteed to work and transparent. Also calls for stronger links to the Environment Agency.

- National Farmers Union state farm businesses are making significant investments in slurry storage across England, either to meet regulatory requirements or to future proof the business. This allows them not only to meet Environment Agency requirements on storage and spreading windows, but also make best use of what is a very valuable resource.
- The Devon Countryside Access Forum advises that SANGS should recognise other needs, not just those of dog walkers, by appealing to young families and those with limited access to other nearby natural open space.
- In many cases this is not an ‘intensification’ of a farm business but just better management of the resource that is already within the business. In these cases, it should not be treated as ‘development’ as it will not have any ‘additional’ impact on phosphate loading in the catchment (as relevant to the Axe catchment).
- Where businesses come forwards with developments to improve water quality these should be looked on positively.
- A developer advised that policy must be reconsidered in order to ensure that it does not unduly prevent or delay the delivery of the district’s housing needs and to ensure there is the flexibility to respond to changes in legislation, policy and guidance – noting Defra-funded Nutrient Mitigation Scheme to be run by Natural England.
- Commented that compensation not acceptable, better to refuse on principle.
- One respondent said “well done”.
- A call was made for Habitat Regulation Assessment to apply to all developments.
- The 400 metre cats buffer zone was challenge with evidence cited that cats will travel and predate further than this, comment that the buffer should be bigger. A further buffer was also called for that limits scale of developments in this buffer – 400-800 metres with development at a maximum of 3 dwellings per hectare.
- Considered that AONBs should also fall under this policy.
- The East Devon AONB team support these requirements as they apply to sites within the AONB
- Agents for Bloor Homes advise that policy is replicates legal requirements and is therefore unnecessary. it is recommended that the section of the Policy entitled ‘HRA process and requirements’ is deleted. The Policy should then be changed to ‘HRA avoidance and mitigation strategies and guidance’

Policy 87 - Biodiversity Net Gain

- Natural England supports policy on Biodiversity Net Gain. We recommend policy is expanded to make it clear that by following the mitigation hierarchy, impacts on

biodiversity should be avoided. If this is not possible, then impacts should be mitigated and finally if there is no alternative, fully compensated. Only after that process is completed should BNG requirements be applied. Whilst recognising that the Devon Local Nature Recovery Strategy is still in an early development stage, it should still be possible through the current NRN mapping to identify key and priority areas for off-site BNG to be used for connecting and enhancing habitats. A suite of 'good practice principles' [Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide. | CIEEM](#) for biodiversity net gain have been developed and published. This information may be useful in gathering evidence and developing policy. These same principles also form the basis of the BS8683:2021 Process for designing and implementing biodiversity net gain [BS 8683:2021 | 31 Aug 2021 | BSI Knowledge \(bsigroup.com\)](#) which is also available and may be of use.

- The Environment Agency fully support the policy, but recommend that the plan sets out how Biodiversity Net Gain will be achieved, especially of offsite compensation and enhancement schemes.
- The Environment Agency recommend that Biodiversity Net Gain be maintained for 100 years in line with national planning guidance for the development lifetime of residential development to be 100 years.
- Policy welcomed and supported with reference that developers who embrace the spirit and letter of the policy in creative ways.
- The East Devon AONB team support the details of paragraph 13.36 and Policy 87 which refers to East Devon Council recognising biodiversity net gain and support that EDDC are seeking to exceed national levels.
- Sidmouth Arboretum - Paragraph 13.41 refers to the many important sites and habitats in East Devon that are small, sporadic and exist in isolation. This is one of the reasons that our hedgerows are so important and the Local Plan should contain strong restrictions on their removal and possibly include obligations on developers to increase the lengths of hedgerows associated with their sites.
- Devon Wildlife Trust advise that they are delighted to see the Council include the requirement to exceed minimum national levels with regard to biodiversity net gain. However, in order to ensure that biodiversity net gain is delivered in a meaningful way, further information is required either within the Local Plan, or as a supplementary planning document. In representation they set out further detail of implementation.
- Call for 20% net gain to apply to all development sites.
- A respondent advocated a higher figure – 40%.
- A call that 20% should be within a defined time period for establishment and colonisation with either replacement species or those that will support a wider range of habitat and off-site mitigation is to be within East Devon.
- Concern that there is a loss period before biodiversity enhancement happens and policy should address this time lag period.

- Query why this is only a policy and not a Strategic Policy and why it does not refer to the Biodiversity Net Gain Metric Tool referred to in Strategic Policy 88 and to refer to the mitigation hierarchy cited in Policy 89.
- Concern that the starting point will be from when site is destroyed by development and not before. Concern also raised that development will invariably lead to biodiversity losses.
- It was cited that the biggest challenge will be monitoring and ensuring developers actually comply. It will require EDDC to put in place suitable resources to make sure this policy aim is achieved. A respondent suggested that this should be at the developers expense.
- Policy should state "there will be a requirement to use the latest version of the Biodiversity Metric."
- Beaver introduction should form an explicit part of policy.
- Swift nest boxes should be allowed for as part of net gain.
- 20% net gain objected to in policy with a call for a 10% figure to match and reflect legislation.
- A 20% figure is seen as unsound as it is inconsistent with National Standards and may impact on the viability of developments and the delivery of housing across the district.
- It was considered that there is no evidence to justify a 20% figure with 10% being seen as appropriate.
- Registered provider considers 10% BNG would halt decline of natural capital and enhance it in a measurable way. Has concerns about viability and long-term housing delivery (affordable and general) if BNG is above 10%.
- A 10% requirement should be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF).
- Policy should not require biodiversity net gain to be delivered in the district – noting cases such as where development occurs close to district boundaries and may be more appropriate outside East Devon.
- Should be provided on site except in exceptional circumstances.
- A Policy requirement of at least 20% Biodiversity Net Gain (BNG) is unjustified and unreasonable. There is no rationale provided for a figure that is double the national requirement. There is only reference to DEFRA Evidence Base and Impact Assessment Report (2017) for biodiversity net gain relating to viability. The DEFRA evidence base is from 2017 and does not provide an up to date portrait of viability, particularly as land prices and construction costs have increased exponentially since 2017. The policy fails to consider additional land take required to achieve 20%, such as where any habitat mitigation is required in the form of nutrient neutrality or Suitable Alternative Natural Green Space - this could include a large land area yet as it forms mitigation it can not be relied upon in BNG calculations – it can contribute up to a point of no net loss but not beyond. In these scenarios it would be difficult for sites to achieve 10% BNG let alone

20%. The policy should be revised to accord with the national 10% figure and encourage any increase beyond that rather than set a minimum figure of 20% that presents an additional barrier to development.

- Home Builders Federation states that there is no justification for requiring a higher percentage of Biodiversity Net Gain which could add significantly to development cost particularly where this would need to be delivered through offsite credits. Overall plan viability study needs to consider this matter, including sensitivity analysis of costs
- Housing Association planning consortium emphasise that a threshold greater than 10% must be robustly viability tested. The 20% requirement has the potential to significantly reduce affordable housing delivery
- Housing Association planning consortium wants guidance to be provided or signposted on how to practically achieve Biodiversity Net Gain, so it can be designed into processes at early stage
- Barratt David Wilson Homes urge EDDC to consider the lessons learnt from planning application 22/1532/MOUT when considering the most appropriate level of net gain. If the 20% level remains in the Local Plan, it could necessitate additional land to be identified to deliver the objectively assessed need for housing, or an increase in density. Both could result in undesirable outcomes. Any increase over that required by the Environment Act would impact on the quantum of developable land, and impact on development viability
- Policy needs to included in the overall plan viability assessment
- Agents for Bloor Homes consider that to ensure consistency with the proposed legislation, it is recommended that the Policy aligns with the legal net-gain requirement in place at that time, with 10% net gain set as the initial default position. This flexible and consistent approach would obviously allow the Policy net-gain requirement to increase above 20%, should the legislation set a higher requirement in the future.
- Agents for Bourne Leisure advise - the requirement set out in draft Policies 84 and 87 for development proposals to result in a biodiversity net gain (BNG) of at least 20% is not justified. Draft Policies 84 and 87 should be amended to “at least 10% net gain”, in line with emerging national legislation as set out in the Environment Act 2021. Moreover, there should be further flexibility in Policies 84 and 87 as to how developers can achieve a BNG, including a mechanism for financial contributions to off-site habitats if on-site delivery is not possible. They say - East Devon already operates a well-conceived financial contribution approach for recreational impacts upon European designations. This should be extended to create funds for strategic projects which can bring wider benefits to the area.
- C G Fry express concern that 20% requirement for BNG is not supported by technical evidence and takes no account of viability and should be amended in line with the provisions of the Environment Act.

- Barratt Homes object to 20% and lack of viability evidence. Evidence base is out-of-date and partly based on another District, which has yet to be examined. Policy not justified or sound. Barratt Homes have committed to deliver 10% BNG on all developments but would support a quantum that is appropriately evidence based.
- A site promoter claims that there is no justification for pursuing a target figure in excess of the national standard (10%) and that the national policy will have a significant detrimental impact on delivery and will produce little in the way of substantive ecological benefits that would not occur anyway.
- Other agents for developers object to the 20% figure.
- Various landowners state that they would make a significant contribution towards biodiversity net gain through their development proposals

Policy 88 - Local Nature Recovery Strategy and Nature Recovery Network

- The Environment Agency support the intentions of this policy and suggest that the Lower Clyst, The Exe Estuary Nature Recovery Area and the National Trust's Three Rivers Recovery scheme at Killerton are good options for targeting nature recovery efforts.
- Devon Wildlife Trust state '...in excess of the standard policy requirement'. We are concerned that an open-ended statement such as this is open to misuse. We would recommend that the Council provide a firm statement of their requirement and would like to see a minimum of 25% net gain required in these circumstances
- This policy is welcomed but net gain should be within a defined time period.
- Call for a ban on development in defined areas.
- There is scope to link with work the AONBs are doing in relation to nature recovery (and review of the management plans).
- Concern that more information and training is needed about the network and strategy to fully understand the benefits of this policy.
- EDDC should not allow proposals for allocated sites to be put forward if they contravene this policy.
- The East Devon AONB team support the policy and welcome the addition to the protection of biodiversity. AONBs are developing Nature Recovery Plans as part of their Colchester Declaration commitment, and these are to be included in the pending review of AONB Management Plans (2025) which will align with this Policy and may be considered as supporting evidence.
- Sid Valley Biodiversity Action Group welcome this policy in support of the Nature Recovery Green Paper.

- Agents for Bloor Homes advise - clarification is required as to the meaning of 'proposals', which, as per the proposed Policy, 'must contribute to the strategic objectives of the Local Natural Recovery Strategy....'.

Policy 89 - Ecological Impact Assessment

- The Environment Agency consider the policy to be comprehensive, but does not refer to BNG and LNRS so that the ecological policies seem disjointed. They recommend that these policies are reviewed to determine how they can be better integrated with one another and to avoid possible duplication or conflict.
- Devon Wildlife Trust state 'Surveys should not be conditioned as part of a granted permission'. We would like to see the use of stronger language in this sentence; 'will or must' would be more robust, with additional comment stating 'Unless in exceptional cases'.
- EIAs must be implemented not should as is written at the beginning of this policy.
- This assessment should be conducted by an independent assessor on all proposed developments.
- This will only work with effective, informed oversight: both review of the reports submitted by developers to ensure they are accurate and monitoring of the actual implementation.
- Some surveys miss out specific species. E.g. if a survey is completed outside of the 12 week period swifts are in the UK they won't be included in a wildlife survey.
- One respondent said "This is an essay, not a Policy."
- Agents for Bloor Homes consider that policy text could be rationalised in this section e.g. text on deviation from best practice could be included in the 'Justification' section, which follows the Policy. It is recommended that the heading 'Protected and notable species' before paragraph 13.53 on the Consultation Local Plan is deleted. Text within paragraph 13.53 can simply be included within the 'Justification' sub-section above. This will avoid confusion with the following policy, Policy 90, which relates to protected and notable species.
- Agents for Bourne Leisure object to the inclusion of 'the precautionary principle' within the policy, and particularly "increasing public participation in decision making". Public participation can be helpful in the planning process but in relation to applying the precautionary principle, there are significant risks that citizen intervention could result in overly risk averse approaches being taken on the whim of a single person. Decision making must be undertaken by, and in consultation with, professionals.
- A developer does not agree with policy text stating ecology surveys cannot be conditioned, as the long time scales on large scale applications can mean some ecological surveys become out of date, so should be able to condition survey updates.

Policy 90 - Due consideration of protected and notable species

- The Environment Agency recommend that the policy should unambiguously require that developers remove invasive species from their land to reduce abundance and prevent future spread into the wild. The policy could proscribe what circumstances this may not be achievable and list them as exemptions.
- The policy needs to be clear on how protection will be implemented.
- There should be no exceptions which lead to degradation of wildlife and loose interpretation of the policies.
- Good to note that birds of conservation concern on the amber as well as the red list are included.
- Requiring applicants to demonstrate full removal of invasives in perpetuity is unachievable. Policy needs to be stronger.
- Should apply to all protected species not just European.
- Agents for Bloor Homes advise - reference is made to the consideration of European Protected Species, defined as species listed under Annex II and IV of the Habitats Directive. It is considered that this should be modified and defined as species listed under Schedules 2 and 5 of the Habitats Regulations. The fifth bullet point in the first series of bullet points (defining protected and notable species) should be modified to text only i.e. not a bullet point.

Policy 91 - Ecological enhancement and incorporation of design features to maximize the biodiversity value of proposals

- There was general support in responses received for the policy.
- However, the Environment Agency did not think it was clear what the policy adds to the BNG and LNRS policies and suggest it should be made clear what it applies to. For example, it should be clarified whether the policy exists for developments of such as small-scale that BNG does not apply such as conversions and changes of use.
- Devon Wildlife Trust advise We welcome the inclusion of the requirement for a minimum of one bird box per dwelling, but would like to see this extended to cover both bat and invertebrate boxes/bricks in addition to bird boxes. Gap provision for small mammals should be specified as 13cm to account for hedgehogs. This section should include reference to the Building with Nature accreditation.
- A number of respondents called for specific mitigation features to be set out in policy, these included Swift bricks/tubes, holes in fences, ponds, long grass and wildflower areas, open green space, tree cover, amphibian-friendly drain covers, dropped kerbs and nesting boxes for predatory birds such as peregrines.

- There was a call for the first paragraph should be redrafted to make it simpler for developers to understand what is required of them.
- A respondent considered that the policy should also refer to the need to retain any trees felled (with the necessary permission) to retain and provide natural biodiversity habitats on site.
- It was commented that policy should specify that policy application/use requires input from a qualified horticulturist/ ecologist.
- It was felt that trigger point for policy application needs to be low and very clear.
- Where farm buildings that have previously held nesting swallows, suitable nesting sites should also be incorporated.
- For item 4 it was agreed that overhanging eaves for the purpose stated are appropriate but if they're made of the wrong materials then the houses built by house martins will drop off after a couple of weeks, often after eggs have been laid or hatched. The RSPB needs to be asked to specify the correct materials.
- There was a call that natural boundaries (e.g. hedges) to be made compulsory in as many instances as possible, rather than man-made, with a ban on clear glass.
- The East Devon AONB team supports the provision of ecological impact assessments and recognises these will contribute to conserving the detailed interests within AONB.
- Newton Poppleford and Harpford Parish Council would like bat and bee boxes to be included and for swift boxes to be specified instead of bird boxes in line with RSPB guidance. The Parish Council would also like RSPB advise on the correct materials for overhanging eaves and for all boundaries to incorporate holes and for all these items to be compulsory.
- Agents for Bloor Homes seek clarification as to the meaning of 'proposals' within policy.
- Agents for Bourne Leisure advise that it is essential that measures to maximise the biodiversity value of proposals and to mitigate adverse impacts of new developments on biodiversity be assessed on a site-by-site basis. The requirements for net biodiversity gain should then be the basis for enhancing features for a project. Therefore, Bourne Leisure suggests that draft Policy 91 is removed from the Plan.
- Sidmouth Arboretum - Most of the design features listed are associated with the buildings. Sidmouth Arboretum suggests the small number of site features should include the planting of trees and hedgerows explicitly to reinforce their importance.
- Sidmouth Arboretum would welcome the opportunity to contribute to the development of design guidelines for all development and comment on developers' proposals to ensure that retention of trees and hedgerows is prioritised wherever possible and any replacement will provide appropriate mitigation to maintain current, and enhance future levels, of biodiversity.

Policy 92 - Tree Policy

- There was a broad level of support for policy though some respondents did not consider that it went far enough in respect of protecting existing trees and supporting or requiring additional planting, there were calls for tree planting targets in all new developments and opposition to any loss.
- The Environment Agency supported the requirement to take account of climate change when selection appropriate trees to plant;
- Devon Wildlife Trust advise 'Development schemes should seek to'. Again, we would prefer to see 'will' or 'must' utilised here. We would like to see the requirement for native species referred to here – please see General Comments above. It is unclear whether this may be an early draft with missing information as sentences appear incomplete. We would recommend this policy is rewritten to be more user friendly.
- There was a call for policy to specifically cover Ancient Orchards, Woodland and Veteran Trees with avoidance of loss to development with the view that as these assets are irreplaceable it would be inappropriate for loss to occur through the development process. Retaining habitat rather than replacing was seen as appropriate.
- There was comment that policy should extend to hedgerows, with opposition to their loss and recognition needed for their wildlife corridor importance. A minimum number of standard trees for new hedgerows was sought.
- There were a range of comments on minimum standards or levels of new planting in developments with a call for overall canopy levels (eg 30% coverage), a new tree in every new domestic garden, a minimum number of trees stated to be planted for developments with larger green spaces.
- It was highlighted that planting small trees is better in health and carbon neutrality terms –with a preference for native UK grown trees and also trees appropriate for specific locations, noting climate change considerations. A respondent advised that owing big trees around with associated soil presents a significant plant health risk
- It was suggested we could have more tree plantations in the AONBs and to protect current woodland there already.
- There was a call for street planting to be incorporated into all new developments with minimum planting standards specified. A respondent advised that we should also consider including a management plan for street trees - to discourage residents from carrying out 'pruning' and to make sure trees are replaced if/when necessary.
- It was suggested trees should be encased (below ground) ensuring roots are adequately restrained so as not to lead to pavement "heave", once mature. Or species chosen with downward growing roots (such as Hawthorth). Similar concerns were expressed about Proximity of tree planting to buildings.
- Design guides to guide developers (and individuals) to plant appropriately resistant and diverse species is critical.

- Having the necessary staffing at the council was seen as critical to policy success and it was highlighted that policing of trees is required before developers move in.
- There was, however, scepticism in that a tree does not become carbon neutral until 27-34 years old. There is no possible way of offsetting canopy cover or where trees are negatively impacted by development within the timespan of this plan. And also scepticism that protection had not been afforded in the past to trees and as such concern about future application.
- A view was expressed that TPOs should mean proper tree protection but in many cases trees are cut down or pollarded close to death without any enforcement being implemented. There was also a call for more TPO's on veteran trees.
- Dead wood was also highlighted as important and leaving dead trees where practical provides vital habitat for wood peckers and other dead wood users, with opposition to wood chipping.
- Newton Poppleford Parish Council want the policy strengthened to protect hedgerows and trees, set a minimum specification for street trees, minimum of one tree per garden, minimum number of trees for new hedgerows, minimum distances between buildings and trees set and presumption of refusal for developments that harm ancient orchards, woodland and veteran trees.
- Support policy in principle, but concerned that there is a lack of clarity about the term 'provide potential net gain in canopy cover and contribution towards local canopy cover goals'.
- Barratt Homes and Vistry do not consider the policy as worded can be adopted until the Devon Tree Strategy is published and then policy will need further consultation.
- Various landowners state that they would make a significant contribution towards tree planting through their development proposals..

Policy 93 - Protection and enhancement of the Jurassic Coast World Heritage site

- There was support for policy for protection and enhancement of the Jurassic Coast World Heritage site, noting its tourism importance and non-replaceability, with more prominence sought.
- There were, however, concerns that some recent development and big developments in general were incompatible with policy and policy and the status of the world heritage site.
- A respondent considered the first paragraph is incompatible with the second paragraph, and the third paragraph is unnecessary.

- A further responded advised “Policy 94 is the wording I would choose to deal with applications impacting the Jurassic Coast World Heritage site. Policy 93 would then be redundant.”
- Bourne Leisure advise that draft Policy 93 does not currently allow for mitigation to be provided where it would offset adverse impacts from development within the Jurassic Coast World Heritage Site. Bourne Leisure requests that the draft Policy is amended to allow for mitigation or compensation to be provided where it would offset harm and adverse impacts in relation to the Jurassic Coast World Heritage Site.
- Sid Vale Association - Agreed though protection of the Jurassic Coast, a UNESCO ‘World Heritage Site’ (comparable to Stonehenge) should be given more weight and prominence as it is a key attraction to the Sid Valley and its tourist industry.

Policy 94 - Protection of designated geological sites

- Policy received limited comments though general support. With some comments that no development/adverse impacts should be allowed on or at designated site.
- Under point 2 it was suggested that the wider network of natural habitats and designated sites is far more important than the unspecified definition of ‘public benefits’. This woolly bullet gives developers far too much room for argument.
- A respondent advised that the AONB needs to be considered as an area of importance for native wildlife and woodlands.
- A respondent advised policy is sufficient to protect the Jurassic Coast, so Policy 93 is not needed.
- Newton Poppleford and Harpford Parish Council want the policy strengthened to reduce scope for developers to argue in favour of development for public good.

Policy 95 - Regionally Important Geological and Geomorphological Sites

- There was general support for policy from the limited number of comments, though a view was expressed that id adverse impacts would arise planning permission should just be refused.
- There was comment, as well, that considered that Policy 94 is sufficient and this policy is unnecessary and confusing duplication.
- Newton Poppleford and Harpford Parish Council consider that such sites should be fully protected and development not permitted.

Policy Chapter 13 - Policy omissions from - Protecting and enhancing our outstanding biodiversity and geodiversity

- Omission of policy reference to green corridors, noting role played by country lanes but vehicular damage that is occurring to these.
- Would be good to have a dead wood policy.
- Call for a policy regarding light/noise pollution and its impacts e.g. bats. See National Planning Policy Framework July 2021 (Para 185, 2021).
- I would like to see some reference to the need to protect the experience of those using the South West Coast Path National Trail, soon to be part of the Round England Coast Path. This is how so many local residents and visitors get to see our wonderful coastline.
- AONB should be covered in this chapter of the plan and given great nature conservation and landscape protection.
- The Woodland Trust advise - Work is underway to create a tree and woodland strategy for Devon. This plan should make space to ensure that it can deliver on the planting targets for East Devon.
- The Devon Wildlife Trust consider that there should be a dedicated overarching policy for the protection and creation of wildlife corridors. Furthermore, it is key that the balance between wider Natural Infrastructure and Natural Green Space/Natural Corridors is made to ensure benefits are genuinely enabled for wildlife and people. Functionally effective corridors with a minimum width of 20m should be encouraged in all developments to benefit biodiversity.
- Devon Wildlife Trust would welcome a commitment to use only native and locally appropriate species for landscape planting, which are locally sourced – from Devon and preferably East Devon - and, to enable this, a commitment to developing local tree nurseries and see hubs

Chapter 14 - Open space and sports and recreation facilities

General matters raised in respect of this chapter included

- In representation Sport England set out details of their role and responsibilities and amongst other matters advise that in order to meet the requirements of the NPPF there should be a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches. They note the Council's local plan comment para 14.6 to complete a new Playing Pitch Strategy. They also note the Council has a Leisure Strategy but question whether it meets the requirements of the Assessing Needs and Opportunities Guidance in respect of being sufficient to be a Built Facilities Strategy.

Policy 96 - Access to open space and recreation facilities

- Whilst there was general support in feedback for access to open space and recreation facilities, with respondents noting physical and mental health benefits, climate resilience and biodiversity.
- Sport England advise that all new dwellings (19000 approx.) in East Devon in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing. They support use of planning obligations to ensure delivery and advise that where appropriate new sporting provision should form part of on-site provision.
- Good accessibility to open space was highlighted in representation as being very important.
- Devon Wildlife Trust advise - we would welcome the inclusion of reference to the requirement for enhancement of our natural environment within this section.
- There was a concern that in the past standards have not been met and there is now frequently under-provision.
- Though a respondent cited the quality of open space provision achieved in the 1950s and 60s.
- There were challenges around standards – with a response highlighting both qualitative and quantitative considerations and questioning whether standards in Policy 97 are the ones sought.
- World Health Organization standards were highlighted in representation with access for people to at least 0.5-1ha of public green space within 300m of their home.
- A respondent advised that wherever possible EDDC should endeavour to exceed minimum standards.

- A respondent also advocated the UN target of 3 trees visible from every home, with a green space within 30 metres and that green space should be a minimum of 300 square metres.
- A respondent advocated that 25% to 30% of all developments should be set aside as open space.
- There was concern that open spaces can be, but should not be “multiple of tiny 'offcuts' of land that are basically unusable”.
- Challenges around ability to successfully implement policy.
- There were calls for additional facilities in certain locations including football and rugby provision in the Exmouth and more open space and connectivity in and through the town, an indoor sports hall in the Sid valley, West Hill needs open space, Cricket pitch needed in Lympstone.
- A respondent advised that open space needs to be available in all weathers with too much land being used falling in flood plains.
- A response considered that we should protect existing open spaces for future generations and spaces should not be sold off as assets that can be materialised in the short term.
- There was a call for open spaces to be imaginatively designed and reference was made to need for a design code.
- But a respondent also highlighted how open access and dogs can adversely impact on wildlife.
- Exmouth Town Council Members are broadly supportive of this policy in so far as it aims to support new open and recreation space; however, experience in Exmouth has shown us that “access” is key and that it is challenging to provide accessible new recreation space of a decent size and quality within our built up area boundary due to:
 - landscape impact including AONB and Coastal Preservation Area,
 - sustainable travel and accessibility,
 - protection of Green Wedge,
 - agricultural land quality,
 - impact on wildlife/biodiversity and trees/hedgerows,
 - sports pitch site sustainability and viability.
- Are the envisaged accessibility (time) standards based on walking or driving?
- In theory this is good, but why continue to develop in the Maer Valley Park and potentially in the AONB that Littleham backs onto. Exmouth like many places needs its greenspaces for the community to access.
- The cycle path in the AONB on the former railway line is enjoyed by the community. Even during lockdown people still drove to come and access this vital greenspace. Overtime parkland has been reduced and we must protect what we already have.
- Also with new large scale developments very little is put towards greenspaces. Even plumb park only has a small area and Pankhurst has nothing. It appears that if on plans

a greenspace is allocated or an area for sports activities, then as the development progresses, developers put in further planning to alter the agreed plans and more housing is built instead. This must be not allowed to happen.

- The provision of more open space and public access is clearly desirable. But unrestricted public access, especially with dogs, can impact badly upon local wildlife. So a more thoughtful and nuanced approach is needed.
- Barratt Homes support policy.
- 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

Policy 97 - Land and buildings for sport, recreation and open space areas in association with development

- Concerned that policy seeks large amounts of open space to be delivered on-site, with little room for variation and no option for off-site delivery embedded within the policy text. The policy wording implies that variation to standards can only be negotiated providing that an overall increase to standards is achieved. This offers no flexibility for scenarios where minimum standards cannot be achieved. As worded there is also no mechanism for off-site contribution.
- Queried why is Sidmouth the only town to which urban open space standards do not apply? (table p280)
- View expressed that provision for all elements itemised are important and especially Natural and Semi Natural space should be at the forefront of the applicants minds
- Noted that evidence is out of date and respondents reserves rights to make further comments.
- Respondents advises that older persons needs are lower than general provision needs and suggests Older person's housing schemes are exempt from the above requirement so long as high quality amenity space suitable for older people is provided on site.
- Considered that policy is too vague and subjective and in respect of off-site contributions it should be explicitly spent on sport and recreation provision.
- Policy should reference avoidance of outdoor light pollution.
- Policy should also refer to unstructured areas like woodland and heathland.
- Policy should refer to indoor facilities as well.
- Support principle but concerned that the wording is not sound as first paragraph contradicts second paragraph and should be deleted.
- Unreasonable to require all sites of over 200 dwellings to provide all the open space typologies identified on-site. The fourth paragraph does not acknowledge either economies of scale, or that the site may not be suitable, for all typologies, for example

playing pitches require level, well drained land. If a typology cannot reasonably be provided on-site, the policy should acknowledge that a financial contribution in lieu may be appropriate.

- Barratt Homes and Vistry agree with policy.
- Barratt David Wilson Homes have concerns about the policy seeking large amounts of open space to be delivered on-site, with little room for variation and no option for off-site delivery embedded within the policy text. No flexibility for scenarios where minimum standards cannot be achieved. No consideration of site constraints or viability. As worded there is also no mechanism for off-site contribution. So is an extra burden on developers

Policy 98 - Location of facilities for sport and recreation, open spaces and allotments

- Emphasis should be attached to upgrading existing facilities.
- The policy should be redrafted to state clearly the intention to discourage the loss of existing open spaces and allotments and the encourage the creation of new ones in urban areas.
- The policy should also consider where the value of one larger open space may be greater than a series of small ones. Cycle and footpaths along riversides could be developed through developer contributions for smaller developments.
- The policy should recognise the value trees and hedgerows in defining soft boundaries to open spaces and encouraging wildlife is to form part of new proposals wherever possible.
- There should be seating and play areas, e.g. every 1,000 metres on walkways.
- Seaton football club should not be relocated.
- Policy should define accessibility distances and how do you define “unacceptable adverse amenity or environmental impacts”?
- Sites need safe car access.
- Lockable cycle storage should be required, though importance of cycle access questioned.
- Devon Wildlife Trust state - ‘provided that unacceptable adverse amenity or environmental impacts do not arise from development’. We would like to see this sentence reworded to include reference to the requirement for enhancement of our natural environment.
- The Devon and Somerset Gliding Club (DSGC) is a non-profit organization that runs a gliding site at North Hill airfield. The club is disappointed that it was not mentioned in the new Draft East Devon Local Plan. The club is the largest gliding club in the south-west

peninsula and hosts a national gliding competition every year. The club hopes that the omission will be rectified in the final plan.

Policy 99 - Retention of land and buildings for sport and recreation use

- Sport England advise that they would be very concerned if any existing sport & recreation land & buildings including playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility. This includes playing fields used by schools (public and private) in East Devon. They consider Policy 99 in the emerging Plan conflicts with para 99 of the NPPF and their national Playing Fields Policy in particular the proposed criteria 2 and 3.
- Sport England would question the need for policy 99 to protect sport buildings and land including playing fields – this is already covered by the NPPF in para 99. A similar “local policy” with its own local exceptions may create misinterpretation and problems that we would expect the Inspector to not support.
- Policy should refer to retention of trees.
- Policy should prevent loss of existing facilities to be replaced by worse/less accessible new ones.
- Policy needs more explicit definitions for terms “equivalent community benefit” and “small part of an overall site” which are open to abuse.
- option 3 should be treated with care - as if new dwellings are built, then there are more who might want to use the open spaces for recreational use, and hence there is no longer an excess of it. To be valid this third point needs more provision over definitions of excess provision.

Policy 100 - New allotments and avoiding the loss of existing ones

- Support - This policy meets many societal aims and is fully supported. Activity, health promoting, nutrition, learning and green space.
- View expressed that allotments should be managed by the Council.
- Allotments should be accessible by public transport and foot/cycle.
- Location for new provision should be contiguous with the previous site.
- Allotment should not be lost to development – noting food impacts of climate emergency.
- Exmouth Town Council advise policy should be clearer on designation of sites and hence protection of sites under the Allotments Act 1925 – noting private allotments are

vulnerable to loss. Also bodies responsible for site management should be consulted in respect of management matters arising from or related to 106 agreements.

- Over-supply test needs greater consideration and clarity.
- Policy needs to be applied and required, esp by housing developers that agree to provision.
- Devon Wildlife Trust state - We would like to see rewording to include reference to the requirement for enhancement of our natural environment.

Policy 101 - Leisure and recreation developments in the countryside

- The East Devon AONB team supports this policy, particularly point 1
- Wording as drafted is unclear and goes further than policy as it refers to planning permission being granted rather than setting out the policy framework in which proposals will be assessed.
- Item 1. should also be expressed more positively, i.e. should be required to be consistent with countryside, natural or landscape policies as well as climate change policies.
- Item 2. Should promote the use of public transport, foot or cycling. Any car parking should be screened by hedgerows and/or tree planting.
- I think that we should not be promoting this kind of thing. Mainly as these kinds of sites are unlikely to be supported by public transport routes and the amount of carbon used for transport is totally not sustainable.
- Agricultural land for farming/food should not be given up so easily. the changing nature of agricultural land is to keep our food supply.
- Exmouth Town Council Members believe that there is a real risk of creep with this type of development with schemes expanding significantly and inappropriately from smaller scale proposals.
- A clear and well written policy.
- Devon Wildlife Trust advise - We would like to see rewording to include reference to the requirement for enhancement of our natural environment.
- Exeter Cycling Campaign would like to see that for developments falling under this policy provision is made for visitors arriving by bicycle.

Chapter 14 - Policy omissions from - Open space and sports and recreation facilities

- Sport England would wish to see inclusion in the plan of a policy for Active Design. They advise that Active Design will help improve health and well-being as well as addressing

climate change and promoting active travel – more walking and cycling. They cross reference principles with Objectives 1 and 6 and Policies 16 and 65 of the draft plan and include in representation a suggested model policy that could be included in the plan and a developers checklist that can be used and could be referenced.

- Sport England consider that there should be an additional policy in the plan – Community use of education sites. Such a policy would encourage greater use by communities of sports facilities and pitches that are located as schools.
- Role of Cemeteries and churchyards as valuable open spaces. Private sports clubs. River/city/town and village community hubs. mental health well-being.
- These policies are ok in principal but great care needs to be given to ensure that other policies such as wildlife conservation, biodiversity, landscape etc should not be harmed in any way.
- There appears to be a lack of consideration for use of open space as a general open space for all. It does not need to be specific to any one sport or activity.

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



PDF 8 of 10

Chapters 15 to 18

Pages 463-473

July 2023

Chapter 15 - Our outstanding historic environment

General matters raised in respect of this chapter included

- All the Policies in this section were strongly supported. There were some requests for clarification and for stronger wording/protection of heritage assets.
- Historic England welcome this chapter but state that, to accord with the national planning framework (Policy 20 (d)), policies should be presented as Strategic Policy
- Historic England state that the Local Plan should illustrate a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. As well as allocating sites, the Plan should also set out how it will consider and positively respond to the heritage challenges and opportunities faced by East Devon's historic towns and villages, landscapes and townscapes, and their relative condition (NPPF para 190). We support the production of a Heritage Topic Paper as evidence to accompany and inform the Local Plan's preparation.
- Devon County Council (DCC) welcomes the inclusion of heritage as a core theme, in particular its inclusion in several Strategic Policies such as Green Infrastructure, Wind Energy, Tourism.
- DCC note that some non-designated heritage assets may be of equal significance as a designated heritage asset and should be considered against such policies (para 15.4).
- Reinforcement is needed to assist the existing Conservation Officers work and coverage and much improved monitoring of work to historic buildings is needed.
- It is important that new development proposals in the vicinity of heritage assets are guided to respect their context and show sympathy in design or layout.
- Planning departments should apply the policy rigorously, and should be properly resourced to do so, both at the planning stage and in monitoring thereafter.
- The Otter Valley Association welcome the policies but would like to see the Guide to listing of Local Heritage Assets and adopted East Devon Local List referenced.
- Lyme Regis Town Council support protection of the historic environment but would like a presumption in favour of alterations to improve the energy performance of historic buildings except where there is unacceptable material harm.

Policy 102 - Historic Environment

- The Policy was generally considered to be comprehensive and the historic environment is considered to be very important.

More specific points included:

- Protection of historic buildings and their environment must have the highest priority in the local plan.
- It is often the small details which contribute to the richness of a locality, and these deserve to be respected.
- Well intentioned policy but unlikely to be effective/Local Plan policies for new development undermine it (Littleham village, area around new town and Whimple specifically mentioned)
- Active uses are the best way to ensure heritage assets are protected and don't fall into disrepair
- Major developments can have a significant impact on heritage assets and their settings.
- Developers and property owners must be held accountable for any destruction of our heritage assets.
- Need for design guide to pick up on use of local materials
- Clear definition is required of a "heritage asset" and that the term could be used, eg, in reference to Exmouth promenade and its heritage as a victorian seaside promenade as well as distinct architectural features.
- Historic information and further surveys are required at an early stage. This needs to have the appropriate enforcement powers and staffing.
- Conservation areas need more protection.
- Should include reference to EDDC adopted Guidance and the 'local list' which has started to identify local heritage assets - surely an omission.
- Not all historic buildings should be upgraded as there should be an authentic historic record through the areas buildings. SPAB guidance should be followed, the use of inappropriate materials (eg foam insulation) can destroy fabric of building
- Improvements should always consider the potential for disruption to nature and wildlife which could be using these buildings. The natural heritage of East Devon should be considered to be part of the cultural heritage of the area. (eg the NHLF Greater Horseshoe Bat project).
- Heritage assets are what give our communities a sense of identity and history.
- Policy should protect Heritage Assets identified in Neighbourhood Plans.
- Protection should be extended to cover natural assets which are part of local heritage eg apple/cider orchards at Whimple
- There is an inconsistency between this policy stating new development "must not cause harm" and policy 103 criterion 2 and 3 describing the various degrees of harm where development will be allowed.
- Policy needs to be applied flexibly in recognition of the shortfall in employment land across EDDC and the sub-region

Policy 103 - Listed Buildings

- The policy was well supported but some respondents felt it should go further whilst others were concerned that it is difficult to achieve energy efficiency whilst conserving historic features.

More specific points included:

- There is lots of sector advice on how to help make historic buildings environmentally friendly. Impact on sustainability and climate change warrants consideration here e.g. <https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/>
- Listed buildings are vital to the sense of place inter locality and should be safeguarded in the ways the policy suggests.
- Policy should acknowledge that listing covers the whole building
- There needs to be much greater protection for listed buildings within the EDDC area.
- Climate emergency makes energy efficiency essential and this should be acknowledged in policy. Reduce red tape. Allow double-glazing on listed buildings
- Difficult to achieve net zero for listed buildings.
- Developers will try and exploit the opportunities given in items I - iv and contract so-called experts to justify harming of a listed building to get their planning approval and profit
- Various individual buildings were suggested for listing and objections raised to proposed sites on the basis of proximity to listed buildings or areas of historic significance.
- Newton Poppleford and Harpford Parish Council is concerned that the drafting of this policy allows developers an opportunity to justify causing harm to listed buildings.
- The National Trust advise - the supporting text to this policy states that Heritage Statements, Statements of Significance, and Impact Assessments should be produced in line with current best practice and relevant national guidance. It is recommended that the guidance states that such assessments should follow a systematic approach in line with Historic England guidance: The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3, 2nd Edition (2017), and Statements of Heritage Significance: Historic England Advice Note 12 (2019), or as per any updates to these documents.

Policy 104 - Conservation Areas

- The Policy generated strong support for CA designation and protection.

More specific points included:

- Additional CA's should be considered. Some Neighbourhood Plans propose new CA's (eg Uplyme) and these should be prioritised.
- Inward and outward views should also be protected.
- Trees within CA's should be retained in new development and replaced if lost.
- Development should be of the highest standard of design, and respect the local and vernacular traditions evident in the conservation area.
- Item 2 - The word 'substantial' is too woolly and certainly not measurable.
- Particular care should be taken to ensure CA are taken into account where affected by proposed allocation sites eg Whimple. Some areas containing allocations eg Littleham, Exmouth, should be considered for designation as CA's
- Permitted development rights have enabled local authorities to undertake inappropriate development in CA's.
- Newton Poppleford and Harpford Parish Council argue that the word 'substantial' is not measurable and will allow developers with large financial resources to overwhelm public opposition.

Policy 105 - Archaeology and Scheduled Monuments

- Policy is supported.
- Devon County Council (DCC) suggest detailed amendments to several parts of the policy.
- More specific points included:
- There should also be included a requirement for communication with the public (not just publication and local authority archiving) as part of any mitigation procedures.
- Policy allows for exceptional cases but doesn't specify what these will be. This needs to be covered in more detail.
- Generally acceptable but note that some monuments are cleaned in the mistaken belief that they look better. In whose opinion ?
- Does the Local Planning Authority have a suitable qualified officer?
- Item5 - The word 'substantial' is too woolly and not measurable.
- Newton Poppleford and Harpford Parish Council argue that the word 'substantial' is not measurable and will allow developers with large financial resources to overwhelm public opposition.

Policy 106 - Historic Landscapes, parks and gardens

- The policy was well supported by respondents although some felt it should go further.

More specific points included:

- Important contributors to local and regional sense of place and deserve policy protection.
- Business sponsors for these areas can help keep them maintained.
- Open countryside and amenity of landscape should be protected at all costs
- Sub section 3 is very subjective, woolly and not very measurable. How do you quantify substantial harm? How do you measure the balance between substantial harm and substantial public benefits? Who decides?
- It's important to link the landscape, park and gardens to the biodiversity actions given the importance some of these can play in providing valuable green space.
- EDDC seeks to commercialise parks and gardens in ways which undermine their historic value, and restrict opportunities to visit

Chapter 15 - Policy omissions from - Our outstanding historic environment

- No need for additional policies was identified.

Chapter 16 - Ensuring we have community buildings and facilities

General matters raised in respect of this chapter included

- None recorded

Policy 107 - New or extended community facilities

- A number of responses to this question highlighted the need for community and other facilities being provided alongside other, notably housing development and suggest that often this does not happen.
- This policy does not specifically protect places of worship that are not Listed. Places of worship are valuable places of social interaction across all groups irrespective of age, sex, gender, race and abilities. They provide the one quiet (indoor) space for reflection away from the busy-ness of life.
- There is no evidence on the space needs for places of worship or associated facilities and the inter-faith needs that might be met to serve a diverse population in certain parts of ED. There is no analysis from the churches or church schools on their needs and this policy should be developed from such dialogue.
- There is a serious lack of sporting facilities that are open and free/ cheap access to the local area. Many sport / football clubs do not have there own grounds or suitable grounds to play in all year round.
- There is no point in increasing the size of villages and all towns if there are no facilities available.
- Dual or multi-use of facilities is often appropriate, within reason, but a spread of locations is also important (for reasons of accessibility amongst others) and there is a risk in, for example, assuming that a school will necessarily be able to double-up as a community facility available for a wider range of uses. Reference made to places of worship sharing with other uses often being inappropriate.
- Concern that new community buildings rarely have solar panels fitted - either to existing buildings or new builds. why not? surely this should be a priority to help overcome climate change?
- Facilities may be lost under questionable viability grounds.
- Exeter Cycling Campaign would like to see that existing facilities are also improved as part of this plan in ensuring accessibility by sustainable modes of transport

Policy 108 - Loss of community facilities

- How is "community" defined? How is "viability" to be measured? This could change from year to year. Add "community" between "higher" and "value" in last bullet.
- So much happens in these community assets, it is absolutely right that they are protected under this policy. Long live village halls!
- Health hubs, specifically Sea Change, was highlighted as an important facility.
- The Theatres Trust welcome the policy's premise of guarding against the loss of facilities in line with paragraph 93 of the NPPF (2021). There are several valued community facilities across East Devon including at least six theatres. However we consider there is some scope for further refinement to ensure the policy is robust and effective. We suggest the first criteria is amended to read, "the community facility is no longer needed and cannot be made to be viable". Viability if given as an option in isolation can be problematic and is vulnerable to being undermined, for example it could be viewed on a narrow commercial basis whereas the same facility could be successful under different ownership or model of operation such as community or voluntary led. It would also be possible to make a facility unviable through neglect. There should be text around viability evidence and relevance of marketing tests.
- Suggested need for additional supplementary text setting out the sort of evidence that may be required to demonstrate redundancy, which should include a minimum marketing period at a value appropriate to existing use and condition without development potential, advertised with local or national agents appropriate to the facility.
- It's not just the value of the facility, but also how accessible it is for those who currently use it. If you could walk to the old facility but now have to drive to the new one because it's too far and there's no bus, then that may not be a suitable replacement.

Chapter 16 - Policy omissions from - Ensuring we have community buildings and facilities

- None recorded

Chapter 17 - Implementation and monitoring of the local plan

General matters raised in respect of this chapter included

- The Environment Agency support the acknowledgement that flood risk and habitats are often critical for new development to take place. However, the Agency note that central government funding for flood infrastructure will only cover a proportion of the cost of a scheme so developer contributions will be important in ensuring that crucial flood risk management infrastructure is delivered.
- South West Water request more emphasis on public infrastructure including the connection for drinkable water and the capacity of the sewerage system to deliver in a timely manner to support present and future development.
- National Highways note the intent to carry out further infrastructure work to support the Local Plan and anticipate ongoing partnership in this work.
- National Highways state that Local Plan growth must be deliverable and there cannot be any presumption that strategic road network improvements associated with growth will be funded through a future National Highways' Road Improvement Strategy.
- Devon County Council (DCC) consider it essential that infrastructure necessary to support the development proposed in the local plan is provided in an appropriately timely manner.
- DCC note the need to ensure there is a coordinated approach to planning and providing education infrastructure, expanding education infrastructure where necessary.
- DCC needs assurance that education contributions will be supported for all dwellings with two or more bedrooms, and are secured via s.106 rather than CIL
- DCC are currently updating the strategic transport model covering Greater Exeter, which can be used to identify necessary transport improvements to mitigate the impact of proposed development sites.
- Home Builders Federation recommends that the plan includes an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported. This should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met.
- Home Builders Federation recommends that the Council 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.
- The lack of proposals on how adherence to the plan – and progress – will be monitored, and by who, was referenced. Another comment said EDDC should ensure that adequate resources are available to monitor polices once in place, with particular reference to Biodiversity Net Gain.

- Specific monitoring to ensure developers actually carry out what they are obliged to do so in decision notices was requested, and that developers should be held to account if they fail to deliver any measures agreed to “reduce or remediate the negative aspects” of a development.
- It was suggested there could also be some form of feedback mechanism for the public to raise concerns or issues with new developments when these are not being done as laid out in the plans, especially when doing remedial works (e.g. to pavements after groundworks).
- It was said monitoring should be “transparent” and reports prepared by the district council should be “freely and easily available in the public domain”.

Chapter 18 - Have we missed anything?

We invited respondents to identify anything that they thought was missing from the plan. Key comments received are set out below:

- South West Water suggest that any planning application is supported by evidence of communication with either SWW or the relevant provider to confirm available capacity.
- South West Water suggest a policy to support 'Locally Significant Infrastructure Projects' that contribute to combating the effects of climate change, improve public health or environmental/social outcomes.
- Exmouth Town Council feel that there should be policies on risks from heat and fire.
- Devon and Cornwall Police are disappointed that there are no references to police infrastructure, stating crime and demand on their services correlates with population growth - therefore Local Plan should state that planning obligations are required to deliver police infrastructure to mitigate the impact of development.
- Devon and Cornwall Police note there is very little in the Local Plan that relates to designing out crime or highlights the importance of designing places that are safe, contrary to legislation and the NPPF (paras 92 and 130). Suggest including a policy.
- There are numerous emerging policies that will have financial implications on development, in addition to infrastructure requirements associated with proposed allocations. Paragraph 34 of the NPPF outlines that policies relating to development contributions should not undermine the deliverability of the plan. Viability should be tested to ensure development is not undermined by policy requirements.
- Exeter Civic Society comment that we understand that the draft plan does not include Cranbrook as a separate one was accepted for it earlier in 2022. However, we think it would be helpful for the reader if future iterations of the plan could at least include in the relevant maps the proposed Blue Hayes extension of Cranbrook to the west and the development of Treasbere Garden Village south of the B3174 for which there is already a planning application.
- The Devon Countryside Access Forum comment there is little reference to public rights of way (PROW) – should seek to link new walking and cycling routes to existing PROW, particularly in proposal for a new town
- Comment made - Why is light pollution important? Buglife Light Pollution Bat Conservation Trust 'Landscape and Urban design for Bats and Biodiversity' Outdoor Lighting p.28: "We recommend ... that efforts are made to retain or create dark skies over urban areas so that people in major centres of population may have access to the night sky
- Consideration of a development site for a new acute hospital in East Devon (if the NHS agreed) and a new secondary school in Exmouth

- Protection of the environment we live in must include sewage pollution, to have raw sewage regularly overflowing on the maer in exmouth in the 21st century is not something to be proud of. it is a disgrace. EDDC must address this as part of the plan
- Monitoring/managing growth of AirBnB - the switch from rental to AirBnB has significant negative impacts upon local residents ability to live and work in the locality.
- A regime of planning and retro-spective planning procedures need to be established to prevent the Cornwall-style housing crisis.
- Use of Covenants registered with the Land Registry to offer a proportion of new build housing exclusively to local residents.
- Controls on conversions of bungalows into 2-storey dwellings and/or requirement in new build estates to make provision of accessible single-storey bungalows suitable for the elderly market.
- It'd be great to have East Devon Local plans to have the requirement for an integral swift nest box at the ratio of 1 box per residence in all planning applications like other councils like Brighton due to the benefits it will bring. Also it would be great if other measures such as Peregrine nest boxes or stork poles could be considered in places as if they are not provided then there is no hope for them to come back.
- Health matters. Re-opening cottage hospitals for Minor Injury Units. Transit beds to help with bed blocking at RDE. More doctors surgeries.
- Need to encourage downsizing and conversion to multi-occupancy.
- Criticisms of Commonplace (the citizen engagement platform used for the consultation process) included: the platform being 'clumsy' and 'unwieldy' to use; time consuming; slow; that is sometimes didn't work; it didn't make it clear to the user if a comment they were submitting had been registered / saved; it was illogical; that the opportunity to submit 'likes' to other people comments only appeared to be available on selected comments; the use of emojis was unclear; that many residents lacked the ability to comment online; that there was no opportunity to edit or correct comments once submitted.
- Comments suggested, where areas are preferred for development, neighbours and residents of adjacent properties should have been consulted directly, rather than "assuming that people have the time and digital dexterity to find out what's planned in terms of development locations". Others thought there had been little promotion on the Council's part of the consultation itself.
- The Avenues Resident Association advise - Para 17.1 - Sewage should also be included in this paragraph and be reported and monitored and Para 17.4 - It is not stated who holds the council responsible and how, and whether the residents of Exmouth see these reports and whether Exmouth Town Council has any responsibility?

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



PDF 9 of 10

Other issues / SA responses /
Conclusions & next steps

Pages 474-482

July 2023

Issues raised that are not necessarily directly relevant to the Local Plan

A number of respondents raised issues that are not directly relevant to or potentially fall outside of the local plan.

Particular attention is drawn to the following matters that were raised:

- A respondent commented that every policy and every budget decision by every EDDC department must now focus on the biodiversity and climate change and prioritise these two overwhelming emergencies.
- A considerable number of respondents raised matters around infrastructure provision. In some cases, these were with respect to provision associated with or required to accommodate new development and as such are clearly planning related. There were also comments about existing capacity and how this could or should inform planning decisions about future development.
- There should be a local tax on land designated for development.
- Car parking charges should be reduced to help businesses.
- There should be greater provision for the youth of Seaton who are poorly served. The (former) Jurassic centre become a bowling alley or youth club.
- Suggestion that we need less people in the UK as it is too many people that is creating the need for too many houses.
- Opposition to aggregate application near Ottery St Mary on account of adverse environmental impacts including in respect of loss of bog habitats and impacts on Devin banks from vehicles.
- Grass verges should be better managed, as happens in Dorset.
- Hedgerows should be sustainably managed.
- The state of properties in Seaton providing private rented accommodation is dire and landlords should be more accountable to maintain properties to minimum standards.
- How can we stop landlords getting hold of multiple properties possibly subsidised by local money?
- Liberate some existing housing stock from second homes and holiday lets.
- Consider Liverpool's £1 house sale for disused and decaying housing stock.
- Fear that houses will end up being bought by buyers from outside the area.
- Second homes and holiday lets need to be discouraged by levying more Council Tax, to provide more homes for local people and less need to ruin the countryside.
- In open space management the council should look to minimise the use of pesticides on its green spaces, implement sustainable tools - such as battery powered devices, rather than petrol driven and should look for ways to increase biodiversity in its green spaces.

This could be done by reducing unnecessary mowing, decreasing mowing frequency in appropriate areas and encouraging fauna and flora to flourish. This needs to be done through communication with the public but has been done to excellent standards by Salisbury City Council among others.

- As soon as Local Plan maps are published there will be lots of real estate deals and potential for people to sue if they are put at a disadvantage.
- Planning is driven by investors and developers and not the local population.
- Bus/train station shelters are poorly designed so do not actually shelter from the weather for example, Exton Station and bus shelters with sloping shelves to sit on.
- Electric vehicles are extremely dangerous to walkers and cyclists because they are silent, heavy, and are prone to battery fires.
- Speed limits are too high, there should be a 20mph speed limit in towns and villages to improve safety, reduce pollution and improve amenity.
- Many CO2 emitting cars will be on the road after the 2030 Government deadline.
- EDDC should check that road signs, safe paths and street lights have been delivered in new developments.
- Much more could be done to utilise the numerous back lanes in East Devon that are for access only.
- Restore the Honiton Road Park and Ride bus in Exeter which has been replaced by the 4/4A service with no guarantee of a space on the bus.
- All Park and Ride services are expensive, it's far cheaper to drive and park.
- Improve integration between local bus services and train stations with integrated ticketing via a Devon Metro system.
- Need a reliable train service by resolving industrial disputes, replacing the trains, and adding carriages.
- We need a new tax on aviation fuel given the huge greenhouse gas emissions from air travel.
- Each town should have its own transport website containing bus and train timetables, bike shops, bike hire, maps of cycle paths etc like www.gettingaroundexmouth.org
- The Commonplace consultation platform was frustrating to use, hard to understand, and confusing.
- Do not close public toilets as this may risk public health, especially on beaches.
- Increase tax on second homes.
- There should be a 20mph speed limit across many more roads – it was observed - a 20mph limit benefits all road users and the whole community: casualties fall 20%, noise almost halves and active travel rises. Climate, safety, active travel, place-making, the economy and quality of life are all helped.

Responses to the Sustainability Appraisal

Consultation on a Sustainability Appraisal (SA) report took place alongside the Draft Local Plan. The SA report assesses the policies and sites in the Draft Local Plan against a series of environmental, social and economic objectives. It also assesses alternative policies and sites, where reasonable, and explains why the preferred policies and sites have been chosen over the alternatives.

Whilst relatively few consultation responses relate solely to the SA report, many Draft Local Plan responses also mention the SA report. A summary of main consultation issues that mention the SA report follows below, by topic:

General

- Impacts on well-being only considered future residents and not the impact of proposed sites on existing population/residents.
- Not adequately considered the impacts of flood risk.
- Need to consider the cumulative effects across the plans.
- Exeter Airport is identified as a significant noise source, so ensure residents of new development are not within the flight path.

Overall distribution options

BDW refers to the SA P110 which assess 4 options for the distribution of the objectively assessed need for housing. Option A is the closest option to that taken forward in the Reg 18 plan. BDW agrees with conclusions about option A. However, even Option A did not consider the sustainability credentials of the distribution of residential development with the Reg 18 plan. There are distribution differences between Option A and the draft plan. So the Plan's distribution has not been assessed. Future SAs should ensure that the sustainability credentials of the proposed distribution is properly assessed.

Scale of Future Housing development

BDW refers to the SA consideration of two options for the level future housing growth (ie Policy 3 requirement). The first based on 18920 (standard method need rate); the second adding a 20% uplift to need. BDW considers that 20% uplift is an unreasonable alternative, based on the assessment work available.

But BDW considers that the SA should have assessed a number of options including uplifts to the requirement of 5%, 10% and 15%. They are deliverable. These are reasonable alternatives that should be considered in future iterations of the SA.

New settlement

- Do not agree with SA report stating new settlement options have a minor impact on transport, loss of 100s acres of land, infrastructure impact, M5 Junctions 29/30.
- SA report has not considered the reasonable alternative for a dispersed option that spreads houses to existing towns (including Cranbrook) and villages without a needing a new town – this would benefit housing delivery as higher number of developers and would mean greater flexibility.
- Disagree that no infrastructure is apparently needed for the first 2,500 dwellings (page 232, bullet point one)
- Disagree that Option 1 is likely to have a major positive effect on minimising carbon emissions, it has not considered the massive carbon footprint of the new town versus growing existing rural settlements, and the impact of travel before on-site facilities are built.
- Overall minor negative effect for Options 1 and 2 is not right as the effects of such a large development could never be described as “minor”.
- Comment regarding local lanes and low traffic volumes is not correct as new town will have at least 8,000 cars.
- Proximity of NCN Route 2 is 1.5km from the options and not on a desire line.
- Disagree that Options 1 and 3 benefit from proximity to train stations because of lack of parking at Topsham, Exton and Newcourt.
- Does not consider health and well-being of existing residents.
- Access to services commentary is unrealistic for 8,000 homes as Exeter, Topsham and Cranbrook are the only service centres of a sustainable scale, all ready access by car.
- Whilst Options 1 and 3 benefit from proximity to Exeter, neither has access by sustainable travel choices.
- Mitigation measure of linking to Clyst Valley Regional Park applies to Options 2 and 3 as well as Option 1.
- Mitigation measures do not mention any improvements to M5 Junctions 29 or 30 which are already at standstill at peak times.
- Seems like reasons for Option 1 mean it has simply been preferred because it is developer controlled.
- Energy from Waste at Hill Barton is mentioned – this is not low carbon in itself.
- Pegasus on behalf of Land Value Alliances support the findings which show that Option 1 is preferred.

- Turley, on behalf of Bloor Homes and Stuart Partners, consider that the SA is sound and has utilised a robust and transparent methodology to demonstrate that Option 1 is the most sustainable reasonable alternative for the delivery of a new community at East Devon. They state that the SA is correct in identifying that Option 1 will result in a number of major positive sustainability impacts in key areas such as: climate change mitigation, the provision of new homes, jobs & employment opportunities and connectivity & transport.
- Not correct to say that the location of the three options has been refined to ensure they do not converge with existing settlements – Option 3 is very close to two settlements, and close to another two.
- Not true that Option 3 provides a largely traffic-free route to Exeter to the north.
- The proximity to train stations is not a benefit as trains are at capacity.
- Evidence states a large area of Grade 1 agricultural land covers northern part of Option 1, the remainder being Grade 3 – this applies to Option 3, not Option 1.
- There is already unacceptable water pollution in the area, which will be made worse.
- Jobs commentary only focuses on jobs during construction, on-site jobs won't be available until construction is complete, so rating should be downgraded to “?”.
- Transport commentary has not considered additional development along the Exmouth Road.
- The 20 minute neighbourhood principle is not applied in terms of food security, despite this being stated in mitigation measures.
- Option 3 is not connected to the Clyst Valley Trail as separated by a dual carriageway.

Exmouth

- There is no bus service along Hulham Road, and the distance to the train station mean that residents will have to drive there, so sites in this area should not be scored as positive on connectivity and transport.
- Objective 1 text for Exmo_03 is incorrect as there is no mature vegetation on the site that is not typical of that found in surrounding gardens.
- Objective 2 text for Exmo_03 does not recognise the potential to extend the pavement along Bapton Lane to improve safety for pedestrians. The removal of trees to do this will reduce maintenance/cost of trimming the trees.
- Objective 6 text for Exmo_03 should note that the site is partly brownfield as it contains foundations and parts of walls of old buildings.

Ottery St Mary

- SA is incorrect in stating that developing GH/ED/26 and Otry_01a would be too visually intrusive as could amalgamate north/north west fields with proposed development at Otry_01b.
- GH/ED/27 and Otry_10 will have multiple and significant constraints, namely construction noise, mental health impacts, flood risk, loss of privacy, water quality impacts on R. Otter, land instability for Salston Barton properties, significant visual impact, poor road access.
- Reasons for including GH/ED/27 and Otry_10 are not clear as other sites are rejected for the same reasons.

Lympstone

- Bus services at Lympstone have recently been cut, and residents in most recent developments do not use the train because there is no direct pedestrian route to the train station, so should not be a major positive effect for access to services (objective 10) and connectivity (objective 13).
- The use of “as the crow flies” distances to facilities is mis-leading as there are no inter-connecting paths so true distances are much higher than stated.
- LRM on behalf of Barratt David Wilson consider that the SA’s finding on Page 109 that Option C is preferred as it promotes development at existing settlements where there is a range of jobs, services and facilities’ is robust. It supports the need for new development at existing settlements where there is a range of jobs, services and facilities.

Feniton

- The rural nature of Feniton means there is a rich habitat for a wide variety of species – it is not true that all sites are improved grassland as there is regular crop rotation. Therefore, should be a negative effect for Objective 1 except for the playing fields.
- Feniton sits in a natural bowl so proposed sites will spoil its setting. Agree that Feni_05 offers an opportunity for improvements, but all other sites should be negative for Objective 2.
- Section on reasons for alternatives being rejected states Feni_08, 09 and 11 are open and exposed, and highly visible from Hembury Fort Scheduled Monument, so should be negative for Objective 2.
- Objective 4 should be negative for all sites as the mere presence of a railway station does not make Feniton “sustainable” given the infrequent service (Office of Rail and

Road statistics show that on average 6 people got on or off each train that stopped at Feniton; PC survey showed 98% of residents didn't use the train) – mass housing will increase traffic, turn Feniton into a dormitory town, and degrade quality of life.

- The lack of jobs, facilities and public transport in Feniton mean that developing sites will increase car use for these things, so Objective 4 should show a major negative effect.
- Objective 4 comment that all sites are being linked by good quality footpaths is completely inaccurate.
- Objective 5 should be negative for all sites as flood mitigation will help current problems, but concreting over greenfield sites will make flooding worse.
- The combined foul and surface drainage system, sewage pumping station and sewage treatment plan in Feniton cannot cope with further households and added surface water run-off, irrespective of SuDS. Should be a double negative for Objective 5.
- Feni_09 is also Grade 1 agricultural land and should be major negative too.
- Objective 8 should be negative for all sites as a car is required given the limited range of facilities accessible on foot, primary school is over capacity, pop-up Post Office is in old Feniton and only open a few hours a week.
- Objective 10 should be neutral at best given the limited range of services in Feniton, primary school at capacity, and limited service at the train station.
- Objective 11: Feniton has the lowest jobs to workers ratio, and the limited train service means it is not a major advantage for accessing jobs.
- For Objective 13, it is too simplistic to say that the presence of train station means a positive score for all sites – should be neutral effect as vast majority of journeys from Feniton are by car, along mostly single track country lanes.
- Feniton should only accommodate modest growth to meet local need like any other Tier 4 settlement given the jobs and services available locally.
- Need to ensure that the borehole drinking water supply is not polluted by new development.

Hawkchurch

Hawkchurch PC - The Sustainability Appraisal misrepresents several aspects:

- It reads for the most part as though there is an available bus service – the bus service should be discounted as it is not sustainable (being one service per week as detailed in the response).
- The accessibility assessment is misleading given the dependency on car travel.
- It suggests there will be no impact on the setting of the listed buildings, we disagree - we believe the proposed level of development would impact their setting, including the Grade 1 listed church.

- It refers to employment space being retained. The storage barns are just that and not an employment area. The community shop is run by volunteers – there is no current employment on the proposed site.
- On page 466 section 8 of the table headed 'Home', the document refers to 'Significant positive where site offers maximum yield >100. All other sites have potential to deliver up to 100 dwellings with a marked positive effect...' This appears to be something left in from another assessment as neither site offers a maximum yield greater than 100.
- The health and wellbeing commentary misrepresents the impact: The scale of development would impact the many walkers in the village, both through the increased traffic and the change in character of the area (35% of household have at least one person who walks daily – the PROW are a significant feature of the Parish). The children's playground is adjacent to the junction of the proposed access road and the main street and close to the site – which includes proposals for light industrial employment space – so actually close to potential noise sources.

West Hill

- The distance to facilities quoted for West_05 as "just under 1km" is not accurate and should be corrected to say it is well over 1.5km to shops/school/village hall, with distances varying from 1.6km to 2.3km.

Local Plan consultation responses may also be relevant to content of the SA report without actually mentioning SA – for example in commenting on the merits of policies or suggesting alternative policies or sites. These are noted in the Local Plan responses set out for each policy and will be addressed as appropriate in future versions of the SA report.

Conclusions and next steps

In this report we have sought to set out a summary of the key themes and issues that have been raised in the consultation on the draft East Devon Local Plan. We have recognised that there were policy aspects and details missing from the plan that would and will require extra work and engagement. However, and more significantly, through the consultation process all and every aspect of the plan is open for debate and as such can change in the light of feedback received.

We recognise that through the consultation work there were some significant challenges that were raised in respect of many of the policies in the plan and especially to many of the sites that were proposed as allocations for development. The plan we produce will ultimately need to be considered by a Planning Inspector at public examination and they will be considering it in the context of Government legislation and policy, specifically as set out in the National Planning Policy Framework. We note, however (and specifically at the time of drafting this report) that there is uncertainty over possible changes to legislation and Government policy. There is, therefore, a degree of uncertainty looking forward, not the least in respect of housing numbers that the Council may determine as appropriate to plan for and accommodate – there may be greater clarity later in the year over this matter through possible changes by the Government and through Council assessment of matters.

In this report there is no comment made on the comments received, and specifically no recommendations on if or how the plan might be change in respect of feedback received. Going forward, however, the Strategic Planning Committee of East Devon District Council will need to determine appropriate local plan policy, and therefore any plan changes, in response to the consultation feedback and any other existing or new or emerging considerations.

Later in 2023 it is likely that the Council will produce a new Local Development Scheme, a project plan for local plan/Development Plan Document production. This will set out what is likely to be a new timetable for production of the local plan.

As part of the future local plan making work we would envisage that further consultation will take place at this Regulation 18 stage of plan making. After this we will move onto the next formal stage of plan making where, at the Regulation 19 stage, the plan (as may be revised) is made available for comment and these comments, the plan and supporting evidence and material is set to the Planning Inspectorate for a public examination.

Timetables for the above work are, however, to be defined.

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



PDF 10 of 10

Appendices

Pages 483-510

July 2023

Appendix 1 - Feedback on comments on the Commonplace platform

Set out below are a range of comments made by people on their negative experience of using Commonplace (the citizen engagement platform used for the consultation). It should, however, be noted that most people who used the platform did not raise negative concerns.

Re: use of the interactive map

If you look at the screenshot I've attached it says that by clicking on a particular point I can leave a comment (or that's what I've understood). I keep clicking on those black dots and nothing happens. Am I doing something wrong? If so what are my options for leaving comments?

I'm truly baffled as to why I cannot leave a comment. I'm using a laptop and mouse rather than an iPad, so in theory it should work. Would you know if this is a widespread problem or just me?

It seems impossible to comment on the individual sites on the Site Map included in the Commonplace consultation. I have followed the instructions but tapping on the points within each site does not take me anywhere. How can I comment on individual sites please? I note that at the top of the site map is the notation "completed". What does this mean please? I have not commented on the sites yet.

The district wide map of proposed sites which purports to give a means of commenting on each individual site (by clicking on "points") simply does not work. It is even headed "completed" rather than "active". I have therefore been unable to respond to this so I shall write to you separately about this section. This tool is clunky, unnecessarily complicated and has the appearance of being designed to put large numbers of people off responding. Maybe this is your intention?

Re: each individual comment being acknowledged separately

Every time I wish to make a comment or agree with a comment it seems that I have to have an email sent to me in order for that agreement or comment to be accepted. Is this truly the case or am I still doing something wrong? If it is the case, is this not an incredibly clumsy process which many might find time wasting and off putting? I can't believe many residents will be motivated to get involved if this is the case.

Re: use of emojis

Some people thought the sentiment emojis were patronising, while some were confused about exactly what they meant and what the numbers meant. There was a feeling by some people that it was some sort of score that would be added up and so would count against people going for the "0" end. I think it would be MUCH better to put the usual legends under each one ("strongly disagree", "disagree", etc.) and drop the percentage numbers both here and in the comments, replacing them with the matching legends.

In other places a 1-5 scale (agree....disagree) was used, and again there should be a separate legend under each one and that legend rather than the number used in the comment.

Because some people skipped clicking an emoji right at the top for one or other of the above reasons, their comment went through as neutral (50). The system should probably require a rating and not allow it to be skipped.

Conversely, some people clicked an emoji and moved on thinking they'd done their feedback, so I had to tell them to plough on through the section until they were thanked and only then was their feedback recorded. The system should probably do the "do you really want to abandon your comment?" thing.

Re: lack of clarity whether documents had been successfully uploaded

I have endeavoured to upload our consultation response on the draft East Devon Local Plan for 2020 – 2040 but to no avail. I keep running into problems when I try and upload or attach the documents via the East Devon Commonplace website. It is possible that I have uploaded it several times (I tried several times) but I have not had any confirmation. As such, please accept our consultation response via email.

I have submitted representations on a couple of policies via the council's Commonplace portal. I think I have also uploaded a site plan and covering letter. Indeed I might have uploaded these twice! However, the system does not seem to record that the documents have been uploaded. Therefore I am copying these to you as well, as a back-up that they actually get submitted.

General comments

Please either make this site works or provide some other way for people to make their views known. The site is unusable as it is and I am not old or incapable by any means!!!

I have just (attempted) to complete my response to the content of the Draft Local Plan. This is one of the worst examples I have seen of a tool that is supposed to be the principal means of gathering views from the public. Having worked at director level in a professional capacity for many years, I consider myself as competent and literate when it comes to IT. Many people will not have the IT skills, nor the same knowledge of public sector language to enable them to work their way through this and respond. The front page is muddled and confusing and gives little clear guidance about navigating through the relevant and appropriate section.

Have tried to submit my response to the EDLP consultation documents, but the Commonplace website won't let me in to the appropriate pages. I asked for support from them but got a message about stuff I should do at my end to try to get it to work. I use a new iMac running the latest operating system software - tried again this morning - still no go. I figure it's not my job to fix deficiencies in their software, so maybe you're paying too much for outsourcing the consultation work. I'm sending my comments here and hope you can add them to wherever they should be at your end.

My final comment is what a tortuous process it has been to use this system, see the information, read the maps, constantly request confirmation emails to be sent again. Truly exhausting. I fear you will have lots of graded responses (very satisfied to very dissatisfied) and limited rich information in the form of actual thoughts and words, Please treat the rich information with more seriousness than smiley faces.

Appendix 2 - Feedback from in-person submissions at the consultation events

This appendix provides details of the main themes and issues that were submitted on the slips of paper that were available for people to make quick comments at the exhibition events.

Paper slip comments from any/all consultation event that relate to the plan strategy

Comments relating to plan strategy	Type of comment	Policy or ref	Category	Summary of comment
plan strategy	support	8	new town	a second new tow near the city/airport is a good idea
plan objectives	comment	Table 8	objectives	objectives 9 and 10 are more important on your list and should go above objective 6. Development should only be approved if safe cycling and walking routes to main facilities are provided.
plan strategy	support	3	housing - need	support planning policy on creating homes
non planning related	comment	n/a	non planning related	Plan would be improved with further work on social mobility
evidence	comment	n/a	climate change - general	Plan would be improved with further work on climate change
evidence	comment	35	flooding	Plan would be improved with further work on flood prevention
evidence	comment	29	climate change - energy	Plan would be improved with further work on energy generation to help cost of living
evidence	comment	Table 8	infrastructure - general	Plan would be improved with further work on upgrades to infrastructure.
plan strategy	Objection		Exeter Airport	The airport was identified as a liability, not an asset. Its continuation and expansion was opposed on climate grounds.
plan strategy	support		Wind turbines	Welcomed that sites for turbnes were identified, it was suggested that general people prefer these to solar farms.
evidence	comment		date of maps	Map is out of date, does not show Cranbrook

Paper slip comments from the Axminster consultation event on the 1 December 2022

Subjects at: Axminster	Type of comment	Policy or ref	Category	Number of similar comments	Summary of comment
allocations_general	Support	19	allocations - support		Support site allocations
allocations_Axmi_02	Comment	19	site constraints - gas pipeline	5	Mains service (gas) for Axminster run through field
allocations_general	Comment	19	biodiversity - phosphates	2	Phosphates in river Axe will delay any development. Potential pollution to River Axe from runoff
allocations_general	Comment	19	infrastructure - transport	6	Traffic management - improvements needed to pinch points in highways at George Hotel and Stoney Lane and Weycroft Bridge or gridlock will be exacerbated by 1000+ homes.
allocations_general	Comment	19	retail		New developments on edge of town will encourage people to shop in Chard or Seaton rather than Axminster unless traffic flow improved in Axminster.
allocations_general	Comment	19	scale of development	2	number of new homes will change character of town completely.
allocations_general	Comment	19	infrastructure - water	2	increased population needs increased water supply and waste water management
allocations_general	Comment	n/a	non planning related		increased risk of wild fires
allocations_general	Comment	19	infrastructure - health	7	Lack of access to health services
allocations_general	Comment	19	environment - design		new buildings need to be eco friendly
allocations_general	Comment	19	housing - affordability	3	housing needs to be affordable in perpetuity. Axminster needs affordable housing for local people and new people on lower incomes. Most homes will be unaffordable and bought by rich retirees
allocations_general	Comment	19	infrastructure - transport	2	need public transport improvements. lack of public transport - bus and train links already difficult to get to work or evening leisure outings
allocations_general	Comment	19	infrastructure - green		need green spaces for nature

Subjects at: Axminster	Type of comment	Policy or ref	Category	Number of similar comments	Summary of comment
allocations_Axmi_02	Comment	19	environment - historic	7	historic site - archaeological interest from Fosse Way
allocations_Axmi_02	Comment	19	allocations - access	7	access poor with lack of parking and tractors using lane. Already congested and parked cars more housing would be chaotic and dangerous
allocations_Axmi_02	Comment	19	biodiversity - wildlife	8	biodiversity - bats fly around the field. There is a bat roost. rare butterflies and linnet roost in hawthorn tree on northern edge of field
allocations_Axmi_02	Comment	19	flooding	4	will cause flooding - runoff from field bad when wet - storm drain floods
allocations_general	Comment	19	infrastructure - transport	5	North to South bypass has not been built - need relief road
allocations_GH/ED/83	objection	19	allocations - access		lack of safe access to A358
allocations_GH/ED/83	objection	19	flooding		adjoins flood area
allocations_GH/ED/83	objection	19	loss of amenity	2	site used for outdoor walking and activities. Beautiful area used for dog walking with footpath and cyclepath
allocations_Axmi_02	objection	19	loss of amenity	3	recreation area for local people giving access to countryside - lovely area to walk and de-stress. leave our countryside alone
allocations_general	objection	19	brownfield first	4	infill brownfield before greenfield. Town centre needs improving should use empty buildings
allocations_general	objection	19	flooding		All houses on higher ground add to runoff and flooding
allocations_general	Comment	19	infrastructure - general	3	insufficient infrastructure - should be plans for new infrastructure
allocations_general	Comment	19	overdevelopment	3	Over development of Axminster. Are all these houses needed? We don't need all this development.
allocations_general	Comment	19	infrastructure - transport		transport already insufficient
allocations_Axmi_02	Comment	19	infrastructure - transport	5	will there be an access point?
allocations_general	Comment	19	infrastructure - education	4	need to consider school places

Subjects at: Axminster	Type of comment	Policy or ref	Category	Number of similar comments	Summary of comment
allocations_general	Comment	19	employment - job opportunities	4	does Axminster have the infrastructure of employment opportunities for ove 1000 new households? Not enough local jobs
allocations_general	Comment	19	agricultural land	2	no to building on agricultural land need to protect farming land for food production
allocations_general	objection	19	housing - affordability		affordable housing will attract anti-social behaviour and crime
allocations_Axmi_02	objection	19	allocations - access		Musbury Road is dangerous - on brow of hill with blind bends.
allocations_general	Comment	19	infrastructure - transport		car parks congested
allocations_Axmi_02	objection	19	environment - parking		impact of additional cars on environmental quality of Woodbury Park
allocations_Axmi_02	objection	19	infrastructure - transport	4	Axminster FC had an application rejected because of traffic congestion
allocations_Axmi_02	Comment	19	infrastructure - transport		A lot of work needed around Musbury Road to make a safe route to town centre
allocations_general	Comment	19	retail		Supermarket needed to north of town and should be facilitated by EDDC
allocations_general	Comment	19	housing - need		housing needed for older people and young families
allocations_general	Comment	19	environment - design		higher density appropriate near town centre - not everyone wants a garden
exhibition	Comment	19	exhibition		exhibition staff not properly prepared and could not answer questions
allocations - Axmi_11 a	Comment	19	flooding		run off into stream by Foxhill already severe in bad weather - water channel is narrow leaving properties at risk of flooding - will drainage be properly managed?
allocations_Char_04	objection	26	infrastructure - transport		nothing should be developed here because of unsuitable roads and access, environmental impact on roads and hedges and increase in traffic
allocations_Char_04	objection	26	infrastructure - transport	2	2 mile walk on narrow unlit road to bus route on A358 with no safe pedestrian crossing in Tytherleigh.
allocations_Char_04	objection	26	infrastructure - transport	2	Too much extra traffic on busy roads, especially at school times, traffic gridlock would be worse and dangerous

Subjects at: Axminster	Type of comment	Policy or ref	Category	Number of similar comments	Summary of comment
allocations_general	objection	26	housing - need		houses not needed
allocations_general	objection	26	housing - affordability		houses would cost more than £500, 000

Paper slip comments from the Exmouth consultation event on the 8 December 2022

Subject at: Exmouth	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
Allocations	Objection	20	General about all site allocation options and general housing growth	11	Loss of identity of Exmouth if sites go ahead as planned. Further development in Exmouth was considered to be unjustified and unsustainable. Objection to building on the periphery of the town with comments raised in respect of adverse impacts in the Maer valley and to the north of Exmouth. Some responses called for development close to the town centre. In one response it was stated that we already have more than enough houses to meet Government requirements though not enough affordable homes. It was noted in a comment that Exmouth has already grown rapidly. A response suggested abandoning Government housing targets and concern was raised around who would live in the new homes and would they be 2nd homes. Concern that many site will causes adverse environmental impacts but are needed to meet Government targets and housing should meet needs and not demands.
Allocations	Objection	20	Land on the north-eastern side of Exmouth	1	The site is remote from the town centre and this would encourage driving rather than walking to facilities.
Allocations	Objection	20	Land at Douglas	1	Concerns around safe access to the site, environmental impacts, sewage capacity and loss of green space.

Subject at: Exmouth	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
			Gardens (Exmo_06)		
Allocations	Objection	20	Littleham Fields (Exmo_08 and Exmo_16 combined)	1	Objection to Littleham Brook development noting the current access for people to nature in this area and its importance for health and wellbeing. The river needs to cope with flooding events
Allocations	Objection	20	Land to the South of Littleham (Exmo_17)(Should be north east of Littleham)	16	Objection to the site on account of inadequate highway access, existing congestion, over parking, single access routes and safety issues on the surroundings roads. Extra roads as part of development were highlighted as likely to bring additional pollution. It was highlighted in response that the site is in the AONB with many ancient trees and hedges of wildlife importance. It was also suggested that allocation would set a precedence for building the AONB elsewhere. Development would generate need for more schools and health facilities with more ill health from more vehicle fumes. It was commented that the Littleham cemetery was nearly full and it was identified as challenging to find additional space, especially for a natural burial area. It was queried if the cycle path would be kept and it was highlighted that for hundreds of years the church has occupied a rural position in peace and tranquillity. The site was highlighted as already being prone to flooding.
Allocations	Objection	20	Land at St John's (Exmo_20 the proposal is to allocate Exmo_20b as shown on the Policies Map)	1	Concerns raised over viability of access to the site.
Economic impacts	Objection	20	Jobs	5	Concern about lack of job opportunities, including better paid jobs, and that without extra jobs in the town people will continue to commute out and

Subject at: Exmouth	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
					suggestion that homes should only be built where there are jobs. There was a call for office development at and near to the town centre.
Economic impacts	Objection	20	Tourism	1	It was suggested that more houses will damage the tourism industry.
Plan process	Objection	20	Plan vision	3	Objection that the plan does not set out a vision or strategy for Exmouth and that proposals for the town do not tie into the objectives.
Plan process	Objection	20	Consultation in general	2	Two respondents advised " <i>It's a disgrace</i> ".
Plan process	Objection	20	Local engagement	2	A respondent called for more engagement and working with the community. And there was suggestions about making the engagement more accessible and meaningful with a call to more fully hear the voices of the people of Exmouth. It was suggested that the current consultation was inaccessible to many.
Plan process	Objection	20	Developer led development	1	Concern that developers change plans, as proposals progress, to suit their financial interests.
Plan process	Objection	20	Listening to local people	1	Considered that outcomes are already determined so responding to the consultation is a waste of time.
Strategy	Objection	20	Types of new homes - pre fab	1	Provision should be made for modern pre-fab locally built homes as an affordable housing option. Also more use should be made of turning ex-commercial buildings into housing.
Strategy	Objection	20	Types of new homes - retirement homes	2	There should not be extra retirement homes as these place excess pressure on medical services.
Strategy	Objection	20	Types of new homes - affordable homes	5	There should be more social housing with one respondent saying not affordable housing as children cannot afford to buy homes. But also submissions saying more affordable housing and a comment made that lack is hindering ability of employers to recruit staff and young people are leaving the town. Concern was also raised that housing schemes often fail to not meet specific

Subject at: Exmouth	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
					target levels of provision and it was questioned how many affordable house go to local people.
Strategy	Objection	20	Agricultural land loss	3	Development will lead to agricultural land loss. More use should be made of Brownfield land for development.
Strategy	Objection	20	Biodiversity adverse impacts	5	Concern about impacts on wildlife and biodiversity from all the development proposed in the plan. Especially losses where development is planned.
Strategy	Objection	20	Countryside and green space - adverse impacts	6	Loss of countryside including the green gap between Exmouth and Lypstone. And also adverse impacts on the AONB. Respondents were concerned about loss of green space and wanted more provision.
Strategy	Objection	20	Infrastructure - flooding	2	Concern that development of green fields will lead to flooding impacts and concerns.
Strategy	Objection	20	Infrastructure - medical facilities	3	Development should not precede new provision of medical facilities and there is insufficient to meet current needs.
Strategy	Objection	20	Infrastructure - pedestrian accessibility/town centre	2	The plan does not promote green credentials in not encouraging people to walk into the town centre. The question was raised of why the town centre is not being regenerated and that as planned new houses will be remote from the centre of town.
Strategy	Objection	20	Infrastructure - links to Exeter	1	Lack of reference / provision for links to Exeter.
Strategy	Objection	20	Infrastructure - footpaths	4	Lack of footpath provision and agreements for provision at Plumb Park have not been met. There was a challenge around where the Exmouth circular cycle path/footpath was and the path at Withycombe and Littleham Brook?
Strategy	objection	20	infrastructure - road capacity and access	8	Concern that road capacity in the town, in general, is inadequate to cope with proposed extra levels of development and there was concerns about the impacts that new development will place in respect of requirements for new roads and impacts that these would generate (noting that any many site

Subject at: Exmouth	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
					specific comments also relate specifically to site capacity and access issues). Comment was made about the delayed failure to complete Dinan Way and also congestion outside of the town was highlighted, specifically on roads to Exeter.
Strategy	Objection	20	Infrastructure - school	6	Existing schools were described as over subscribed and cannot cope with extra development. A need for a 2nd secondary school was identified. Development should not precede new provision of school spaces.
Strategy	Objection	20	Infrastructure - sewage and water capacity	2	Sewage system cannot cope with existing population and will not cope with extra development.
Strategy	Objection	20	Infrastructure - green energy production	5	New homes and buildings should all incorporate solar panels and use heat pump technology. High green standards should feature in new homes.
Strategy	Objection	20	Shops	1	Development should not precede new provision of additional shops.
Strategy	Objection	20	Should build elsewhere	3	There were representations seeking to build elsewhere away from Exmouth. More and speedier development at the new town was highlighted in representation thus lessening the need to build in Exmouth. An Exmouth respondent questioned the credibility and suitability of any of the site options highlighting traffic congestion issues and challenges.
Strategy	Objection		General about all matters	1	In general comments about East Budleigh it was advised that Salem Chapel is an important historic listed building that should remain outside the settlement boundary with green space all around.
Strategy	Objection		General about all matters	1	In general comments about Otterton it was stated that - it is too full already, there will be environmental impact (from development) and there is no mains gas.

Subject at: Exmouth	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
Strategy	Objection		General about all matters	3	In comments about Lympstone it was advised that proposals for Lympstone negatively impact on all plan objectives bar 3. There were also concerns flagged for Exmouth that development north of Exmouth would erode the important gap between the town and Lympstone.

Paper slip comments from the Honiton consultation event on the 7 December 2022

Subject at Honiton	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
Strategy	objection	--	upottery classified as unsustainable	2	Object upottery classed as unsustainable, more development should be placed in the area to support the school and local business
Allocations	Objection	21	Gitti_05	1	Object the development, concerned about the drainage system in the area as local resident. Also more dentist and doctor needed in Honiton area, as local people not have access to density service in Honiton.
Allocations	Objection	21	Gitti_05	1	Access via Hayne lane is not suitable for the current amount of traffic in the area, more housing development will bring the traffic to completely unacceptable level.
Allocations	Objection	21	GH/ED/39(A)	4	Upset about the proposed development GH/ED/39A which next to ottery valley park. Concerned about the safety and security issues. Also, the development will affect the views and quiet characteristics of the area.
Allocations	Objection	21	GH/ED/39(A)	2	access road not good enough for any extra traffic in the area.
Allocations	Support	21	Plymtree	1	support no allocation in Plymtree
Flooding	objection		Flooding	2	Flooding issue not consider carefully, esp. A30.

Subject at Honiton	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
Access	objection		traffic	1	The Roundabout get into Honiton cannot take all the traffic, as it is already very busy.
Housing	Objection		Affordable housing	1	Not enough affordable housing in Honiton
AONB	Objection		AONB	6	Sites fall within AONB should not be allocated, in order to protect the wildlife, biodiversity and landscape. It is the charter of Honiton.
Drainage	Objection		Drainage	2	Drainage should be consider before any allocations as it is a problem to honiton even without extra hosuing development.
Town Boundary	Question		Town Boundary	1	Question about the town boundary and is it up-to-date and reflecting the ture.
			affordable housing	1	25% affordable housing still subject to the planning permission which is unacceptable
			Housing	1	We do not need the large amount housing in other area, when we have a new settlement under development.
			Honi_01	1	Access is unsafe and unachiveable; very limited infrasture in the area and without local shop except the farm shop.
			public event		Poorly planed and not enough information and maps, staff unable to answer all the questions during the event.

Paper slip comments from the Ottery St Mary consultation event on the 30 November 2022

Subject at Ottery St Mary	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
allocations_GH/ED /27, Otry_10	Objection	22	allocations - landscape	1	Visual prominence of these sites is no different to Otry_01 from a distance. Adverse visual impact from footpath users through the site.

allocation s_genera l	Objection	22	infrastructure - public transport	5	No more housing until public transport is improved.
allocation s_genera l	Objection	22	employment - job opportunities	1	There is little work locally so people have to travel outside Ottery to work.
allocation s_genera l	Objection	22	environment - design	2	The style of housing recently approved has not been sympathetic to the town.
allocation s_GH/ED /29	Objection	22	allocations - transport	2	Development would cause increased traffic at the junction with Tip Hill.
consultati on	Comment	22	consultation	1	The thoughts of local residents are largely ignored.
allocation s_genera l	Comment	22	infrastructure - transport	1	Quarry plans at Straightgate (nr Daisymount) will have a severe effect on traffic on the main road from Ottery to the A30.
allocation s_Otry_0 1	Comment	22	housing - location	3	Housing should be located on the west side, along the road to Exeter, to avoid traffic issues in the town centre.
allocation s_GH/ED /29, 30	Objection	22	allocations - location	3	No new housing at Gerway due to traffic issues, flooding.
allocation s_genera l	Comment	22	non planning related - transport	1	There should be a 20mph speed limit in Ottery and permit parking to make the roads safer.
allocation s_Otry_1 5	Objection	22	allocations - transport	1	The road south of the five-way junction of Slade Road, Knightstone Lane, Chineway Gradens is a narrow, single track, winding road.
allocation s_GH/ED /29	Objection	22	allocations - transport	1	No pedestrian access to the town.
allocation s_West_ 01	Objection	26	allocations - location	1	Allocating West_01 is inconsistent with Neighbourhood Plan aim to resist infill development
allocation s_West_ 01	Objection	26	allocations - flood risk	1	Development at West_01 will cause more flooding in the lower areas.
allocation s_West_ 01	Objection	26	allocations - trees	1	The site is protected by TPOs and housing will destroy the tree roots.

Paper slip comments from the Seaton consultation event on the 15 December 2022

Subject at Seaton	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
allocation_s_general	Comment	23	environment - design	3	Ensure new buildings are of a high environmental specification e.g. solar, rainwater harvesting, insulation, heat pumps.
consultation	Comment	23	consultation	2	Extend the consultation period and give residents more of a say.
allocation_s_general	Objection	23	housing - need	4	Too many houses are planned.
allocation_s_general	Objection	23	housing - affordability	5	Houses are too expensive for local people, need more affordable housing.
allocation_s_general	Objection	23	infrastructure - health	4	Lack of access to health services.
allocation_s_general	Comment	23	Land availability	2	How do we know if local landowners are selling their land for development?
allocation_s_Seat_03, 05	Objection	23	allocations - transport	2	Allocations will cause congestion and safety issues on Seaton Road and junction with A3052, Popes Lane, and Wetlands entrance.
allocation_s_Seat_03, 05	Objection	23	green wedge	6	Seat_03 and 05 are within the Green Wedge.
allocation_s_Seat_08	Support	23	allocations - transport	1	Extra traffic along an inadequate road (Churston Rise).
allocation_s_Seat_08	Support	23	allocations - landscape	1	Adverse landscape impact as houses would be higher than the natural top of the hill.
allocation_s_Seat_08	Support	23	allocations - biodiversity	1	Wide range of wildlife exist on the site.
allocation_s_Seat_03, 05	Objection	23	allocations - biodiversity	2	This land is vital for wildlife, especially bats, owls, local flora and fauna.
allocation_s_general	Objection	23	brownfield first	4	Brownfield sites should be used first.
allocation_s_general	Objection	23	infrastructure - general	21	There is not enough infrastructure to support 217 more houses in Seaton - school, doctors, hospital, dentists, sewerage.

Subject at Seaton	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
allocations_general	Objection	23	housing - need	2	Maximise use of existing stock by discouraging holiday lets, using empty homes, and provide flats for downsizing.
allocations_general	Objection	23	flooding	5	Need to consider the flooding impact of 217 more houses and associated concrete.
exhibition	Comment	23	exhibition	1	Would be useful to have a plan showing where planning permission has been granted to get a full picture.
allocations_general	Objection	23	environment - agricultural land	2	Place greater emphasis on the preservation of agricultural land.
allocations_general	Objection	23	infrastructure - open space	2	Provide green space within and between development.
exhibition	Comment	23	exhibition	4	Generally EDDC try hard in difficult circumstances, pleased with the exhibition but not enough staff present and need more maps.
allocations_general	Comment	23	car parking	1	Object to overnight parking of camper vans, especially at the Underfleet car parks.
allocations_general	Objection	23	allocations - landscape	2	Colyford will lose its identity.
allocations_general	Objection	23	infrastructure - playing pitches	2	Need a new football pitch for team to be upgraded.
allocations_general	Objection	23	environment	6	Adverse impact upon the Wetlands.
allocations_general	Objection	23	allocations - landscape	1	The AONB needs to be protected.
allocations_general	Objection	23	allocations - landscape	1	Coastal protection should be upheld.
allocations_general	Objection	23	infrastructure - general	3	New infrastructure should come before new housing.
allocations_general	Objection	23	allocations - transport	2	The roads are too small to sustain the extra traffic from proposed new housing.
allocations_general	Objection	23	employment - job opportunities	4	There are not enough jobs for residents of housing, need employment land.
allocations_general	Objection	23	retail	3	Lack of shopping facilities, need to revamp the town centre.

Subject at Seaton	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
allocations_general	Objection	23	infrastructure - utilities	2	Need to water supply, electricity and gas supply can sustain the extra houses.
allocations_general	Objection	23	environment - renewable energy	1	Do not agree with solar energy allocations around Holyford Woods.
allocations_general	Objection	23	environment - renewable energy	1	Do not agree with wind energy allocations around Holyford Woods. Position of turbines would be very low so not effective.
allocations_Seat_05	Objection	23	allocations	1	Shocked to see Seat_05 proposed as it has been dismissed three times, even by the Planning Inspectorate at appeal.
allocations_general	Objection	23	biodiversity - phosphates	1	Need to consider phosphates run-off.
allocations_general	Objection	23	infrastructure - facilities	1	No facilities for young people.
allocations_general	Objection	23	housing - need	1	Build more multi-generational homes to make more efficient use of housing stock.

Paper slip comments from the Sidmouth consultation event on the 6 December 2022

Subject at Sidmouth	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
sites(not allocated)_SIDM_25	Comment	24	infrastructure - transport	5	Proposed site unsuitable on highway grounds
sites(not allocated)_SIDM_25	Comment	24	environment - AONB	5	Proposed site unsuitable due to impact on AONB
sites(not allocated)_SIDM_25	Comment	24	environment - Historic	2	Proposed site unsuitable due to impact on historic heritage site (Sand House)
sites(not allocated)_SIDM_25	Comment	24	infrastructure - water	5	Increased rain water flow will cause problems / surface water flooding
sites(not allocated)_SIDM_25	Comment	24	site sustainability	3	too remote
sites(not allocated)_SIDM_25	Comment	24	infrastructure - education	5	lack of school spaces
sites(not allocated)_SIDM_25	Comment	24	environment - farm land	2	loss of agricultural land
sites(not allocated)_SIDM_25	Comment	24	noise	1	Noise impact on neighbours
sites(not allocated)_SIDM_25	Comment	24	environment - biodiversity	2	Adverse impact on biodiversity
new settlement	Comment	8	infrastructure - transport	1	Proposed new settlement unsuitable on highway grounds, already overrun
new settlement	Comment	8	infrastructure - water	1	Increased risk of flooding, what input have SWW had?
general transport	Comment	1	infrastructure - transport	1	Sustainable transport should be prioritised for any allocations
general housing	Comment	24	housing	1	Sidmouth needs new 3 and 4 bed affordable properties. The sooner building can start the better.

Subject at Sidmouth	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
general infrastructure	Comment	1	infrastructure	1	Infrastructure needs to be in place before [other] development.
consultation	Comment	n/a	social democracy	1	EDDC suggested as forcing through decisions based on the wants of selected landowners. 'Should have consulted residents first'.
allocations_SIDM_01	Comment	24	environment - biodiversity	1	Concern over impact on AONB
allocations_SIDM_01	Comment	24	infrastructure - all	1	The local infrastructure can't cope with existing residents, new development would add to the strain
allocations_SIDM_01	Comment	24	local amenity	1	Concern over proximity to neighbouring properties on Higher Woolbrook Park
general housing	Comment	3	housing targets	1	Levelling up and regeneration bill noted as allowing a rethink on housing numbers and appropriate locations. New focus should be on urban areas and brownfield sites.

Paper slip comments from the Clyst St Mary consultation event on the 2 December 2022

Subject at Clyst St Mary	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
Allocations	Objection	8	General - Exeter suburb/expansion	2	The development will become a suburb of or part of Exeter.
Allocations	Qualified support	8	General about all options	4	Whilst new community not supported it was suggested it was a better option (with scope for infrastructure provision and proximity to Exeter) than bolting housing onto existing settlements. Highlighted that employment land provision needs to be part of the discussion. Also suggested that

Subject at Clyst St Mary	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
					any road should be past (east) of Westpoint in order to relieve A3052 traffic levels.
Allocations	Objection	8	General about Clyst St Mary	1	Positive that land areas bordering Clyst St Mary are rejected for development.
Allocations	Objection	8	Odours from Hill Barton	2	Considered that house building is inappropriate in proximity of Hill Barton on account of bad odours from Hill Barton.
Allocations	Objection	8	Site Option 1	10	Option 1 highlighted as inappropriate with poor infrastructure. Capacity of the A3052 was challenged. Also suggested proximity to Cranbrook was inappropriate and loss of prime farmland would be significant. Preferred status of this option was questioned with a respondent stating " <i>preferred by who...</i> " A land owner advised that their land was shown in this option but they did want it to be so.
Allocations	Qualified support	8	Site Option 1	2	This site was suggested as the best option. With matters raised including potential for to access the A30 and A35.
Allocations	Objection	8	Site Option 3	2	Objection to this option with adverse traffic and environmental impacts highlighted.
Allocations	Qualified support	8	Site Option 3	3	This option was seen as less bad than others given existing developments at and around the sit and generally better infrastructure and less adverse environmental impacts. Roads were considered to be better.
Economic impacts	Objection	8	Jobs	2	It was questioned where the jobs were for any new residents of the proposals.
Economic impacts	Objection	8	Tourism	3	Development will discourage tourist from coming to East Devon, with 15 years of building congestion, and instead they will go elsewhere (Inc. Cornwall).
Plan process	Objection	8	Compensation	1	Suggested that there should be compensation for existing residents.
Plan process	Objection	8	Consultation in general	1	Considered that the consultation process was ill thought out.

Subject at Clyst St Mary	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
Plan process		8	Developer led development	6	Considered that the proposals are developer led and this is inappropriate. Also highlighted that there was confusion given development proposal material that was presented to committee. Also lack of trust in quality of some house builders products and suggestion that developers are greedy.
Plan process	Objection	8	Knowledge of officers at the exhibition	1	Considered that staff at the exhibition could not answer questions asked.
Plan process	Objection	8	Listening to local people	5	Views of local people are not being taken into account and are likely to be ignored in decision taking. Development is being imposed and will adversely impact on quality of life of local people.
Plan process	Objection	8	Trust in the Council	7	Suggested that the process being followed indicates public distrust of East Devon District Council. One respondent wrote " <i>They have radicalised GESP</i> ". It was also suggested decisions have already been taken and considered the approach of new town provision showed laziness from the Council. The (deliberate) lack of information on a possible new road from the A30 to A3052 was stated as a concern.
Strategy	Objection	8	Adverse impacts on existing villages	1	New community development will have will have adverse/destroying impacts on existing settlements.
Strategy	Objection	8	Adverse impacts on listed buildings	3	New community development will have will have adverse/destroying impacts on listed buildings.
Strategy	Objection	8	Adverse impacts on quiet amenity	2	New community development will have will have adverse/destroying impacts on peace and quiet that exists at present with adverse impacts on existing residents.
Strategy	Objection	8	Agricultural land loss	7	Development will result in loss of agricultural land with adverse impacts occurring, specifically including food supply..

Subject at Clyst St Mary	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
Strategy	Objection	8	Alternative new town options	1	Should consider other new town options such as two new towns each with 4,000 homes.
Strategy	Objection	8	Biodiversity adverse impacts	5	Development will result in loss of features of biodiversity importance and will have adverse impacts on wildlife species.
Strategy	Objection	8	Countryside - adverse impacts	4	Loss of countryside will occur with adverse impacts.
Strategy	Objection	8	Cranbrook completion	2	Cranbrook needs completing before any future new town is considered and more generally considered unfair to have another new town whilst residents are still suffering from Cranbrook development.
Strategy	Objection	8	General - Site assessment process	1	Stated that the site assessment process was too subjective.
Strategy	Objection	8	Housing requirements	8	Imposed housing targets are inappropriate for East Devon. Suggested homes may lay empty and a respondent suggested new homes are too expensive for local people and are being bought as 2nd homes and buy to lets. Also suggested, on a general level, that development is not needed and one respondent advised development would house illegals (assumed illegal immigrants). Suggested Government housing requirements should be challenged and also a CPRE report on housing need was cited as showing that need figures are lower than these being planned for.
Strategy	Objection	8	Infrastructure - fire services	1	Provision is not planned for fire services.
Strategy	Objection	8	Infrastructure - flooding	8	Development will increase surface water run-off and heighten flooding problems. Reference was made to flooding in Farringdon. Also suggested existing flooding problems should be sorted out.
Strategy	Objection	8	Infrastructure - medical facilities	7	More pressure on existing health facilities that are already over-stretched.

Subject at Clyst St Mary	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
Strategy	Objection	8	Infrastructure - pedestrian safety and cycle provision	1	Concerns around provision of footpaths and cycle paths and associated safety issues.
Strategy	Objection	8	Infrastructure - public transport and buses	3	Inadequate provision is made noting existing poor public transport.
Strategy	objection	8	infrastructure - road capacity and access	14	Has not taken account of the already congested A3052 and general pressure on roads which cannot cope. Junctions 29 and 30 were considered to be at capacity and could not accommodate more cars, also village access roads and junction congestion was highlighted in comments.
Strategy	Objection	8	Infrastructure - school	5	Lack of provision and concern that provision of new schools will not happen.
Strategy	Objection	8	Infrastructure - sewage and water capacity	3	Insufficient sewage capacity and no powers to require upgrades as part of the development.
Strategy	Objection	8	Infrastructure - shop	1	Concern their would be inadequate shops.
Strategy	Objection	8	Long term impacts	1	Development will have long term negative impacts (destroying Devon).
Strategy	Qualified support	8	Master planning	1	Considered it should be called a new community which should strive to meet as many policy statements as possible and these should inform the masterplan. The idea of 4 garden villages should be considered.
Strategy	Objection	8	Nuclear power station	1	A respondent commented "why don't you build a nuclear power station whilst your on!"
Strategy	Objection	8	Quality of development	1	Suggested a new town will end up being a slum.
Strategy	Objection	8	Should build elsewhere	3	Principle of new town opposed with proposal that there should be development elsewhere in East Devon or provision is just not needed.
Strategy	Objection	8	Wind farms	1	Suggested land would be better used for wind farms.

Paper slip comments from the Feniton consultation event on the 13 December 2022

Subject at Feniton	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
allocations - Feni_05	Objection	26	Allocations	1	Sewage pipes that serve the site are too small with adjoining/close by properties experiencing sewage back-ups/floods in wet weather. New sewage provision is required.
allocations - Feni_05	Objection	26	Allocations	1	Acceptance of this development site.
Strategy - general	Objection	26	Developers and money	2	Concern that the development agenda is about greedy landowners making money.
Strategy - general	Objection	26	Development locations	1	A respondent suggests that if there is a need to build then join up the old and new villages (though in other comments they challenge appropriateness of development).
Strategy - general	Objection	26	Flooding	9	Highlighted that Feniton has existing severe flooding problems that will be exacerbated by further development leading to greater damage.
Strategy - general	Comment	26	House prices	1	Housing costs were identified as too high.
Strategy - general	Objection	26	House sizes	2	Need for smaller homes for the elderly to release family home.
Strategy - general	Objection	26	Infrastructure - buses	4	Bus services are infrequent/poor.
Strategy - general	Objection	26	Infrastructure - medical facilities	7	Medical provision was criticised for being over-subscribed, including GPs.
Strategy - general	Objection	26	Infrastructure - pub	1	Lack of a decent pub
Strategy - general	Objection	26	Infrastructure - railway station and trains	8	Too much weight is attached to the station as a consideration in suitability for development, highlighted that services are poor (a stopping train every 2 hours) and the platform is short.
Strategy - general	Objection	26	Infrastructure - roads	9	Existing narrow lanes, in general, are highlighted as congested and inadequate to cope with existing or extra traffic.
Strategy - general	Objection	26	Infrastructure - roads at	1	Traffic problems and congestion are significant at the railway crossing and more development will lead to greater tailbacks.

Subject at Feniton	Type of comment	Policy or reference	Category	Number of similar comments	Summary of comment
			railway crossing		
Strategy - general	Objection	26	Infrastructure - school	11	The village school is full and the nearest alternative is at Payhembury, accessed by narrow roads.
Strategy - general	Objection	26	Infrastructure - securing new facilities	2	Objection that new development is not accompanied by additional services and facilities and highlighted that an infrastructure plan should precede a development plan.
Strategy - general	Objection	26	Infrastructure - shop	2	There is only one shop in the village.
Strategy - general	Objection	26	Jobs	3	Lack of job opportunities in the area was highlighted as a reasons to oppose new housing development.
Strategy - general	Objection	26	Loss of farmland	3	Objection to building that would see the loss of farmland and consequential reduction in food production.
Strategy - general	Objection	26	Social integration	1	Referencing the super planning appeal concerns highlighted around social integration of possible new population if housing development goes ahead.
Strategy - general	Objection	26	Sustainability	1	A respondent writes "Sustainable ??? Buffoons the lot of you".
allocations_general	Objection	22	allocations - transport	1	Roads are already congested, they were built for cart and horses, and new development would worsen problems .
Development-general	Objection		More building at Cranbrook	1	A respondent (not from Cranbrook) advised that we should be building at Cranbrook only.

At the consultation events there were also comments made about other settlements. Matters raised included:

In respect of Chardstock

- infrastructure – transport - nothing should be developed here because of unsuitable roads and access, environmental impact on roads and hedges and increase in traffic
- infrastructure – transport - 2 mile walk on narrow unlit road to bus route on A358 with no safe pedestrian crossing in Tytherleigh.
- infrastructure – transport - Too much extra traffic on busy roads, especially at school times, traffic gridlock would be worse and dangerous
- housing – need - houses not needed
- housing – affordability - houses would cost more than £500, 000

In respect of Cranbrook

- More building at Cranbrook - A respondent (not from Cranbrook) advised that should be building at Cranbrook only.

In respect of East Budleigh

- In general comments about East Budleigh it was advised that Salem Chapel is an important historic listed building that should remain outside the settlement boundary with green space all around.

In respect of East Budleigh

- In general comments about Otterton it was stated that - it is too full already, there will be environmental impact (from development) and there is no mains gas.

In respect of Lympstone

- In comments about Lympstone it was advised that proposals for Lympstone negatively impact on all plan objectives bar 3. There were also concerns flagged for Exmouth that development north of Exmouth would erode the important gap between the town and Lympstone.

In respect of West Hill

- allocations – location - Allocating West_01 is inconsistent with Neighbourhood Plan aim to resist infill development
- allocations - flood risk - Development at West_01 will cause more flooding in the lower areas.
- allocations – trees - The site West 01 is protected by TPOs and housing will destroy the tree roots.

