

Agenda for Strategic Planning Committee Tuesday, 8th July, 2025, 10.00 am

Members of Strategic Planning Committee

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

Venue: Council Chamber, Blackdown House, Honiton

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This meeting is being recorded for subsequent publication on the Council's website and will be streamed live to the [East Devon District Council Youtube Channel](#).

1 Minutes of the previous meeting (Pages 3 - 11)

Minutes of the meeting held on 15 May 2025.

2 Apologies

3 Declarations of interest

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

4 Public speaking

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

5 Matters of urgency

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

There is one late item that is recommended to be dealt with in this way.

Item 9 – Exmouth Rugby Club revised project and Community Infrastructure Levy Bid

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 East Devon Local Plan - Consultation feedback, timetable and future workplan (Pages 12 - 107)

This report sets the scene for future local plan production work.

8 East Devon Local Plan - Local Development Scheme (Pages 108 - 117)

This report sets out details of a proposed revised Local Development Scheme.

9 Exmouth Rugby Club - Revised Project and Community Infrastructure Levy Bid (Pages 118 - 119)

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[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 19 May 2025

Attendance list at end of document

The meeting started at 10.04 am and ended at 12.45 pm

260 Minutes of the previous meeting

The minutes of the previous meeting held on 4 February 2025 were confirmed as a true record.

261 Declarations of interest

Minute 265. Community Infrastructure Level (CIL) bid recommendations.

In accordance with the Code of Good Practice for Councillors and Officers dealing with planning matters as set out in the Constitution, Councillors Todd Olive and Colin Brown advised of lobbying in respect of this item.

Minute 265. Community Infrastructure Levy (CIL) bid recommendations.

Councillor Eleanor Rylance, Affects Non-registerable Interest, I am a patient of Pinhoe and Broadclyst surgery.

Minute 265. Community Infrastructure Levy (CIL) bid recommendations.

Councillor Geoff Jung, Affects Non-registerable Interest, There are a number of environmental proposals that I have had a part in development.

Minute 265. Community Infrastructure Levy (CIL) bid recommendations.

Councillor Jessica Bailey, Other Registerable Interest, As a Devon County Councillor will only speak on this item as a member of the public and will leave the room during discussions and the vote.

Minute 265. Community Infrastructure Levy (CIL) bid recommendations.

Councillor Paul Hayward, Other Registerable Interest, As a Devon County Councillor will only speak on this item as a member of the public and will leave the room during discussions and the vote.

Minute 266. South East Devon Wildlife - Joint Habitats Site Mitigation Strategy 2025 to 2030.

Councillor Geoff Jung, Affects Non-registerable Interest, I am a member of the Habitat Regulations Joint Committee.

Minute 268. Planning and Infrastructure Bill Update.

Councillor Geoff Jung, Affects Non-registerable Interest, There are a number of changes to environmental practices addressed in the report. However I come with an open mind and do not consider myself to be pre-determined..

Non-Committee Member

Minute 265. Community Infrastructure Levy (CIL) bid recommendations.

Councillor Eleanor Rylance, Affects Non-registerable Interest, I am a patient of Pinhoe and Broadclyst Surgery.

262 **Public speaking**

Six members of the public had registered to speak.

The first speaker, Robert Persey spoke about rural exception sites and referred to the Council's policy on Housing Needs Surveys which he suggested contravened Paragraph 82 of the National Planning Policy Framework as the policy did not provide opportunities to bring forward these sites to help with affordable rural housing. He advised that there were currently 5,100 families on the Council's housing waiting list and out of the whole of the district only three parishes had conducted a Housing Needs Survey suggesting this was a deliberate way to prevent affordable rural housing. In response the Chair advised that following the adoption of the Local Plan the Council would be revising its supplementary planning document to take in account affordable housing.

The following two speakers spoke on Minute 265 Community Infrastructure Level (CIL) Bid Recommendations.

Devon County Councillor, Broadclyst Division, Henry Gent expressed his support for the four bids within his division. He emphasised the need for a primary school at Tithebarn as many of the families living there had failed to get their preferred nearest primary school places. He emphasised the need for the extension to Pinhoe Surgery as the practice have advised they would need to close their patient list this October. He also referred to the London Road, Cranbrook project advising that this footpath would be a much-needed connection to the new extensions of Cranbrook.

Ottery St Mary Town Councillor, Janice Aherne referred to the Tipton Primary School project and requested that the Committee consider deferring the project to allow the Department of Education time to clarify its need and requirements. She advised the Committee that the school was the heart of the village and if the school was removed the village would die.

The following three speakers spoke on Minute 267 East Devon Local Plan – timetable production update.

John Hamill reminded the Committee that he had previously addressed his concerns about the draft Local Plan at the meetings on 11 December 2024 and 4 February 2025 where he urged the Committee to get the critical process of the Local Plan right. He said it was clear from today's report that the Local Plan was inadequate, and this was evident by the missing technical reports and evidence as well as the objections to the Local Plan received from statutory agencies. Mr Hamill urged the Committee to delay the Local Plan and to follow the right and lawful processes to get the site selections and the consultation right.

A statement was read out on behalf of Nigel Humphrey which highlighted his findings from the Regulation 18 Consultation about site Exmo_20 which he believed should not have been put forward in the consultation.

Thomas Shillitoe reminded Members of the concerns he and others had raised about the draft Local Plan at the meeting on 4 February. He referred to the site Exmo_20 which he said was not available, suitable or achievable and which he claimed had been falsely evidenced in the Regulation 19 Consultation and he believed the Inspector will be very concerned when the Local Plan is submitted for examination.

Mr Shillitoe sought clarification from the Assistant Director Planning Strategy and Development Manager whether he believed the Regulation 19 Local Plan was sound and had met all the necessary legal requirements.

He addressed the habitat mitigation strategy and suggested it was pointless spending CIL monies for the Pebblebed Heaths or endorsing the Wildlife Strategy when the site selections had still not been assessed to identify any potential threats. Finally, he urged the Committee to only include the preferred sites and second choice sites in the Local Plan before it was submitted for examination.

In response the Assistant Director Planning Strategy and Development Management firstly addressed the comments made about Exmo_20 and advised that a feedback report on the Regulation 19 Consultation would be brought to Committee in due course setting out the responses received and recommendations about how to proceed with the Local Plan.

He did not agree with the comments made about having false evidence in the Local Plan and explained that the evidence was an ongoing process which officers were continuing to work on to update and refine the Plan.

In response to Mr Shillitoe's question the Assistant Director Planning Strategy and Development Management confirmed that he believed that the Regulation 19 Local Plan was sound but pointed out there was a need to review its current position after taking into account the comments received from the consultation which would be provided in the feedback report.

263 **Matters of urgency**

There were no matters of urgency.

264 **Confidential/exempt item(s)**

There were no confidential or exempt items.

265 **Community Infrastructure Levy (CIL) bid recommendations**

The Committee considered the Assistant Director Planning Strategy and Development Management's report that sought Members endorsement for the support of 7 project bids and to reject 5 remaining bids that the Community Infrastructure Level (CIL) Member Working Party had considered on 15 January and 27 February 2025.

The report set out the details concerning the types of bids received and the process that was followed for scoring the bids which would receive funds from the Strategic CIL Fund of £11.289million. It was noted the CIL Member Working Party had proposed that £1million should be retained for delivery of future projects.

In summary the 7 project bids supported were:

East Devon District Council - Clyst Meadow Country Park, Station Road, Broadclyst SANGS

Priority 1

To deliver 10 hectares of Country Park (SANG) and future management.

CIL Bid £1,383,624

Conditions

Cabinet on 1 May 2025 agreed that the SANG's would be managed in-house using an endowment model funded from CIL, however the CIL Member Working Party considered that the £2million upfront cost could not be justified and that an Annual contribution from CIL was preferred.

Honiton Town Council - Enhancing sport provision in Honiton

Priority 2

New pitches at Tower Hill, 3G at HCC and HPS drainage and lighting at Allhallows.
CIL Bid £601,000

Devon County Council - Mosshayne/Tithebarn Primary School

Priority 1

Construction of 210 place primary school and nursery provision
CIL Bid £4,500,000

NHS Devon Integrated Care Board - Pinhoe Surgery Extension

216 sq.m. extension to surgery to create 6 new clinical rooms due to 56% increase in patient numbers from East Devon growth areas.

CIL Bid £800,000

Conditions

A safeguard measure will place a legal charge on the property with Land Registry preventing the building from being sold without the CIL, S106 and NHS grant being repaid.

Devon County Council - Cranbrook Multi-Use Path

Priority 1

1.5km off-road walking, wheeling and cycling route between Cranbrook and Exeter
CIL Bid £1,800,000

Devon County Council - London Road, Cranbrook

Construction of missing footpath/cycle provision between Cranberry Farm pub to Ingrams

CIL Bid £750,000

Exmouth Rugby Club – Extension

2 DFU compliant changing rooms (women and girls)

Priority 2

CIL Bid £100,000

Comments from Non-Committee Members included:

Ward Member, Councillor Eleanor Rylance referred to the Council's commitments to the Pebblebed Heaths and hoped that East Devon District Council and Broadclyst Parish Council were in talks about the long-term future of the SANG at Station Road, Broadclyst and the Cranbrook multi-use path which would run through the SANG was crucial to promote active travel. She supported Councillor Gent's comments about Tithebarn Primary School and said it was nonsensical as the development was composed of nearly all young families. Lastly, she supported the Pinhoe Surgery extension and made Members aware that the surgery was in fact a cross-border surgery which went into Broadclyst and had been struggling with capacity for some time due to developments in the West End of East Devon.

Councillor Bethany Collins and Councillor Peter Faithfull supported a deferral for the Tipton St John Feasibility Study. Councillor Collins advised as it was a priority 1 bid it would be a missed opportunity to have further discussions with the Department of Education.

Councillor Ian Barlow, a Member of the CIL Member Working Group, reassured the Committee that a lot of time had been taken to obtain all the necessary advice to reach a decision on the bids. He drew attention to the upcoming devolution which was only 3 years away and suggested there was a need to ring fence the funds for the SANG at Broadclyst to ensure this money was secured.

Councillor Roy Collins referred to the site for the Honiton football facilities and said it was not suitable for a football pitch.

Ward Members and Devon County Councillors Jessica Bailey and Paul Hayward asked the Committee to consider a deferral of the decision to reject the bid on the Tipton St John Feasibility Study as there was less of a risk with this feasibility study bid as the DFE have already confirmed there is funding available but it was the question of where the school was to be located that needed further work.

Councillor Paul Hayward sought clarification from the Assistant Director Planning Strategy and Development Management about the point at which the bidder is given the funds. In response it was advised that a funding agreement would need to be set out for each bid but that fundamentally this Council would hold on to the funds until the bidder is ready to spend it.

Councillor Jess Bailey and Councillor Paul Hayward left the room and did not take part in discussions or vote for this agenda item.

Committee Members questions and comments included:

- It was questioned about the current number of pupils attending Tipton St John School and whether there would be enough pupils to attend the new one. The Assistant Director Planning Strategy and Development Management could not give a number but explained there were issues about the location of the school as a lot of pupils' travel from Ottery St Mary to Tipton St John.
- Clarification was sought on the reason to reject the bid from Network Rail. Members were advised it was an early decision by officers to reject all the feasibility studies as it was not the Council's responsibility to fund this work.
- A statement was read out on behalf of Committee Ward Member for Broadclyst, Councillor Paula Fernley who supported the 4 bids in her ward.
- Members wanted to thank the CIL Member Working Party on reaching their decision and thank you to the CIL Officers for their guidance.
- Support was expressed for all the successful bids.
- Support was expressed to defer the Tipton St John Feasibility Study bid with a suggestion that the school should be located in Tipton St John as it is a valuable asset to the village. In response the Assistant Director Planning Strategy and Development Management advised that deferring it could set a precedent for other feasibility work bids and it would be better for them to make a further bid the next time there is a bidding round.
- A concern was raised with the wording for Recommendation 3 as delegated authority was only given to the Assistant Director Planning Strategy and Development Management and the Director of Governance and would not involve the Committee. It was suggested that the recommendation should be in consultation with the Chair as well.
- Broadly support the recommendations as written but do have a concern with the funding for the Mosshayne/Tithebarn Primary School as this is conditional on DCC

providing more detailed costings – this is almost like the Council is being asked to write an open-ended cheque!

- Disappointment was expressed about the feeble level of financial support from the NHS.

Councillor Yehudi Levine proposed the recommendations as written, seconded by Councillor Kevin Blakey subject to a slight amendment to Recommendation 3 to include the Chair of Strategic Planning Committee.

RESOLVED:

1. The recommendations of the CIL Member Working Party in respect of each CIL bid received be agreed and to reject the bids listed in the table at paragraph 6.2 and approve those listed in the table at paragraph 6.3.
2. That all the bidders who submitted rejected bids be advised of the outcome of their bid with reference to the reasons stated in this report.
3. Delegated authority be given to the Assistant Director Planning Strategy and Development Management in consultation with the Director of Governance and the Chair of Strategic Planning Committee to agree funding agreements with the successful bidders based on the conditions as set out in the report.
4. That Members agreed to advise Cabinet that they do not agree to funding an endowment to cover maintenance costs of the SANG at Station Road, Broadclyst as per Cabinet's resolution of 1 May 2024 and recommend that Cabinet agree that these costs be funded through an annual contribution of £40k from CIL for the first 3 years after which these should be reviewed.

266 **South East Devon Wildlife - Joint Habitats Site Mitigation Strategy 2025 to 2030**

The Committee considered the South East Devon Wildlife – Joint Habitats Site Mitigation Strategy 2025 – 2030 report that had been jointly produced by officers from East Devon District Council, Teignbridge District Council and Exeter City Council to ensure that effective and coordinated mitigation can be implemented on the impacts of development on protected habitats for the Pebblebed Heaths, Exe Estuary and Dawlish Warren in the period from 2025 to 2030.

The Assistant Director Planning Strategy and Development Management briefly summarised the mitigation measures which included on-site and off-site mitigation measures and sought Members endorsement of the proposed approach and to recommend to Cabinet that the Joint Habitats Site Mitigation Strategy 2025 – 2030 be adopted.

Clarification was sought on the proposed price increase per house. Although the exact costings per dwelling could not be provided at the meeting Members were advised that the cost would increase fairly significantly.

RECOMMENDATION TO CABINET:

That Strategic Planning Committee recommend to Cabinet that the South East Devon Wildlife Joint Habitats Site Mitigation Strategy 2025 – 2030 be adopted.

267 **East Devon Local Plan - timetable production update**

The Committee considered the East Devon Local Plan – timetable production update that sought to endorse the proposed review of the timetable to come to a future

committee meeting and to include a second Regulation 19 Consultation in the Autumn to include the masterplan and further work on the New Community.

The Assistant Director Planning Strategy and Development Management addressed the reasons for the review which included receiving a lot of comments through the consultation of the Local Plan and receiving a number of concerns raised by statutory bodies in relation to missing evidence. A further reason was in relation to the complex work for the New Community which included further work on developing the masterplan and answering outstanding questions on delivery models.

Discussion on the timetable production update included:

- Clarification was sought about when the Committee would receive feedback from the Regulation 19 Consultation. Members were advised that a summary could be brought to the next meeting.
- Clarification was sought on the current five-year housing land supply figure. Members were advised that the current figure stood at 2.97 years which the Council will continue to monitor.
- Further information was requested on the Water Cycle Study in paragraph 3.2. The Assistant Director Planning Strategy and Development Management explained that South West Water had taken six months to provide data to the study which has led to further work being needed as some data was missing in relation to the waste water infrastructure.
- Reassurance was sought on a potential target date to confirm all the work for the Local Plan had been completed. The Assistant Director Planning Strategy and Development Management advised that all the work would need to be completed by the start of June as this would be within the required 18 months of being published. The Chair confirmed the deadline would be 12 June 2026 which was 18 months after the new NPPF was published.

RESOLVED:

That the proposed review of the local plan making timetable be endorsed with a new revised timetable for plan making to come to a future committee meeting and to include a second Regulation 19 Consultation in the Autumn to include the masterplan and further work of the New Community but also additional evidence and changes to the Local Plan itself.

268 **Planning and Infrastructure Bill Update**

The Assistant Director Planning Strategy and Development Management presented the report that updated Members on some key proposals on the Planning and Infrastructure Bill.

In summary these key proposals included:

- National scheme of delegations
- Mandatory training for committee members
- Planning application fee setting
- The reintroduction of strategic planning at combined authority/combined county authority level
- Nature Restoration Fund
- Compulsory purchase
- Development corporations

Members noted that the report was being considered by Cabinet on 4 June 2025 and that any comments made would be verbally reported.

Questions and comments made by Members included:

- Clarification was sought on who had provided the response that there was a need for a smaller number of Members to sit on Planning Committee. In response it was advised that officers had responded to that question under delegated powers which was in relation to strategic applications. This response had been shared with the Chair of Strategic Planning Committee before submission.
- A concern was raised that the Bill appeared to be streamlining the planning process which would take away the opportunity for councillors and members of public to respond. This would undermine the democratic process.
- A concern was raised about Natural England taking control of Habitat Regulations.

RESOLVED:

That the provisions of the Planning and Infrastructure Bill and their potential implications for the delivery of the planning service and strategic planning be noted.

Attendance List

Councillors present (for some or all the meeting)

B Bailey
J Bailey
K Blakey
C Brown
P Hayward
B Ingham
G Jung
Y Levine
T Olive (Chair)
H Parr

Councillors also present (for some or all the meeting)

B Collins
I Barlow
R Collins
P Faithfull
E Rylance

Officers in attendance:

Ed Freeman, Assistant Director Planning Strategy and Development Management
Damian Hunter, Planning Solicitor
Wendy Harris, Democratic Services Officer
Paul Osborne, Green Infrastructure Project Officer
Melissa Wall, Section 106 Monitoring Officer

Councillor apologies:

O Davey
P Fernley
M Howe
D Haggerty

Chairman

Date:



Report to: Strategic Planning Committee

Date of Meeting 8 July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

East Devon Local Plan – Consultation feedback, timetable and future workplan

Report summary:

This report sets the scene for future local plan production work. Specifically this report:

- a) Advises on feedback received at the 1st stage of Regulation 19 consultation – noting that there were a significant number of comments received for the 1st stage consultation that concluded in March 2025.
- b) Provides a steer on how the Council can effectively and efficiently respond to concerns raised in consultation feedback. We would highlight, that several Government bodies raised concerns and we would want to seek, where reasonable and appropriate, to address these and other comments through statements of common ground/dialogue and in some cases through plan changes.
- c) Highlights ongoing evidence production work to inform and justify plan policy for the 2nd round of consultation.
- d) Sets the scene and timetable for the proposed second round of Regulation 19 consultation. It is planned that this should start in in October 2025 and conclude in November 2025.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

1. That Strategic Planning Committee endorse the proposed new local plan making timetable and work plan, including studies to be completed.
2. That Members note the change to the Planning Practice Guidance regarding two stage Regulation 19 consultations and identify any areas where they would like officer advice on potential changes to the plan that are not already being considered in the work programme set out in this report. These to be addressed in a report to a future meeting prior to the second Regulation 19 consultation materials being presented to the Committee.

Reason for recommendation:

To establish a formal work plan for local plan production.

Officer: Ed Freeman – Assistant Director Planning Strategy and Development Manager,
ed.freeman@eastdevon.gov.uk Tel: 01395 517519

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☒ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☒ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☒ Place, Infrastructure and Strategic Planning
- ☐ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Low Impact

Risk: No specific risk impacts are identified.

Links to background information Links are contained in the body of the report.

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
 - ☒ Carbon neutrality and ecological recovery
 - ☒ Resilient economy that supports local business
 - ☒ Financially secure and improving quality of services
-

1 Work to date on the local plan

- 1.1 Committee will be aware of the significant progress that has been made on local plan production to date. Of most recent importance was the conclusion of the 1st round of consultation under Regulation 19 of the plan making regulations. This report specifically highlights matters arising from this and action to take the plan forward through to a 2nd round of consultation and then to plan submission for examination, through the examination and thereafter to adoption.

2 Feedback on the 1st stage of Regulation 19 consultation

- 2.1 The 1st round of local plan consultation, under Regulation 19 stage of plan making, concluded on 31 March 2025. In total we have recorded 3510 individuals or organisations making comment on the plan, some commenting on one matter only though many commenting on a wide range of matters.
- 2.2 The separate comments received on the plan are logged on Commonplace against the policy or part of the plan that they relate to. Where people/organisations **did not** use the software we have uploaded their comments onto the system. With all comments being on the software it ensures that we have a complete and comprehensive set of all comments in a single place. Though in some cases, where for example respondent

accompanied submissions with such material as images, maps or technical assessments these sit outside the software.

- 2.3 We would highlight that uploading non-commonplace made comments on to the portal was a time-consuming task, but we concluded it was valuable to do so and we would not have authority to dismiss any comments that did not come through the portal.
- 2.4 In many cases people did not make it explicitly clear which part or parts of the plan they were commenting on so there has had to be some officer interpretation of submissions to determine where they should be attributed. In some cases comments have been split up where they clearly relate to separate plan parts, even if not stated or set out as such in submissions.

3 Issues raised in Regulation 19 consultation feedback

- 3.1 We have undertaken an assessment of matters raised in consultation feedback. A consultation feedback report is appended to this report and it sets out a summary, on a policy by policy, and allocation site by allocation site basis, of key matters raised in feedback and scale of comments/concerns highlighted.
- 3.2 We received 1.1million words in feedback on the consultation. It is highlighted that we have used artificial intelligence software (CoPilot) to summarise the comments received, noting it would be a mammoth task to undertake in the absence of use of such technology and not using the technology would delay feeding back by several weeks. Use of such software also ensures a more consistent approach to and balance in feedback reporting.
- 3.3 The key themes and issues raised include:
- **Volume and Focus of Responses:** The most commented-on policy was SD01, particularly the proposed allocation of site Exmo_20, which drew over 1,100 responses and multiple petitions. Concerns centred on biodiversity, flood risk, infrastructure, and procedural fairness.
 - **Housing Strategy:** There was widespread objection to the housing requirement figure of 20,909 dwellings (80% of the standard method), with calls to meet the full need of 26,136 dwellings. Respondents also criticised the stepped trajectory and over-reliance on a single new settlement.
 - **Spatial Strategy and Settlement Hierarchy:** While there was broad support for focusing growth in the West End and Main Centres, concerns were raised about the under-classification of certain settlements (e.g. Feniton) and the underrepresentation of Exmouth's strategic role.
 - **Infrastructure and Viability:** Many responses highlighted the need for stronger commitments to infrastructure delivery, particularly for healthcare, education, and utilities. Viability concerns were raised across multiple policies, especially in relation to affordable housing, climate policies, and biodiversity net gain.
 - **Environmental Protection:** There was strong support for policies promoting biodiversity, climate resilience, and landscape protection. However, several policies were criticised for being overly rigid, duplicative of national guidance, or lacking clarity on implementation.

- **Sustainability Appraisal and Legal Compliance:** Numerous representations challenged the soundness and legal compliance of the Sustainability Appraisal, particularly regarding the allocation of Exmo_20. Concerns included inconsistencies with the HELAA, lack of consultation, and failure to apply the Mitigation Hierarchy.
- **Neighbourhood Plans and Community Engagement:** Respondents expressed frustration over the perceived marginalisation of neighbourhood plans and the usability of consultation tools. There were calls for greater transparency, responsiveness, and respect for local input.

3.4 At a later date we will bring a report back to committee with more detailed officer commentary around the issues raised in comments on the plan and possible changes. This will help inform and set the context/justification for proposed plan changes.

4 Responding to comments on the plan

4.1 It is to be expected that any plan that is submitted for examination will be submitted with objections. This is standard and as such there should be no expectation that all (or even most or in fact any) objections will be resolved. This is specifically noting that some commenting on the plan will have diametrically opposed views from others making comments on the same subject matter or for example development site allocation.

4.2 There is scope, however, to seek to address some objections to the plan. It is suggested that where these have come from statutory bodies and consultees, and specifically from bodies falling under the Duty to Cooperate, it is specifically appropriate to review whether seeking to resolve concerns raised is desirable and appropriate. We do however need to be careful to limit the changes to the plan particularly in light of new guidance in Planning Practice Guidance which states:

“How do the implementation aspects of the NPPF apply to plans where more than one round of Regulation 19 consultation has been undertaken?”

Some local planning authorities may undertake more than one round of Regulation 19 consultation on a plan. Where this is the case, for the purposes of implementing Annex 1 of the Framework, a plan is normally to be taken as having reached the Regulation 19 stage at the date on which the first round of Regulation 19 consultation commenced. However, in some limited circumstances, a plan is to be taken as having reached Regulation 19 on the date that a subsequent round of consultation commenced. These limited circumstances could include instances such as when the content of an emerging plan has changed significantly from the one presented at the initial Regulation 19 stage.

Paragraph: 86 Reference ID:61-086-20250616

Revision date: 26 06 2025”

It is essential therefore that we ensure that the plan does not change significantly from that presented in the initial Regulation 19 stage if the plan is to proceed under the transitional arrangements. Members are asked to have due regard to this when suggesting any further changes to the plan and should note that while some individual changes may not be significant in themselves it is the cumulative impact of changes that may be significant. However, if Members have concerns highlighted through the

consultation responses appended to this report, then there is an opportunity to highlight these at the meeting so that officers can provide advice on these issues in advance of the committee considering the next iteration of the plan.

5 Summary and response to comments on the local plan

- 5.1 In addition to receiving comments from the public and the development industry (as well as interest groups and others) we highlight that a number of bodies with statutory powers (including some we are legally required to consult) and other public organisations with specific responsibilities also commented on the plan.
- 5.2 Some of these statutory bodies raise significant concerns and objections to the plan. In some cases these could be overcome with plan changes that would not be substantial in respect to actual wording changes but could overcome concerns highlighted and reduce the number of modifications needed at examination (and by design the number of objections that would need to go forward to examination).
- 5.3 It is stressed that the Council is not obliged to agree with comments made and may take a different view on matters from those making the comment. However, it would be prudent to consider matters carefully and review whether plan changes would be desirable and/or further assessment work is needed which in some cases it is indicated is needed/desirable.
- 5.4 The following table briefly summarises some of the key issues raised by statutory bodies and indicates the work being undertaken to address concerns.

Issue	Actions
National Landscapes The Levelling-up and Regeneration Act 2023 (LURA) introduced a duty for planning authorities to 'seek to further' the statutory purposes of protected landscapes (conserving and enhancing their natural beauty). Representations have been received from Natural England and both the Blackdown Hills and the East Devon National Landscape partnerships raising concerns that it is not clear how the plan strategy and site allocations comply with the duty to further the purposes of the national landscapes.	Review allocations within or adjacent to a national landscape to assess whether they are justified in light of the 'duty to further' and the relevant guidance . Update the 'Major Development in the National Landscape Topic Paper ' to address concerns raised by Natural England and the National Landscape partnerships.
Wind Energy The local plan policy map identifies areas suitable for wind energy that are relatively small, and some that are close to the national landscapes (modern wind turbines can be 150 metres high). The Environment Agency, Historic England, Natural England and the Blackdown Hills Partnership have raised concerns about the potential impact of wind turbines on heritage assets, landscape and water quality. There is concern that identifying relatively few, small sites	Consider whether removing the areas identified from the proposals map and amending policy text could reasonably overcome the issues. Although noting that this would appear to be contrary to the 2023 version of the NPPF that the plan needs to comply with.

Issue	Actions
<p>is effectively an allocation for which assessment work has not been undertaken to understand the impacts on heritage/landscape. This issue is complicated by changes to the NPPF between 2023 and 2024 (transitional arrangements state that the plan should be examined under the 2023 NPPF). The 2023 NPPF requires us to consider identifying areas as being suitable for wind energy to be shown on the policy map. Applications could then only come forward within those areas, however the 2024 NPPF removed this limitation making identifying such areas less important.</p>	
<p>Transport National Highways and Devon County Council highlighted the need for transport evidence, in particular regarding highways capacity for West End developments (including employment and New Community).</p>	<p>This evidence is being produced.</p>
<p>New Community Devon County Council raised concerns about the absence of some detail around proposals for the new community and supporting evidence.</p>	<p>This is being produced.</p>
<p>Health Care The NHS has identified a lack of capacity in primary health care in the west of East Devon.</p>	<p>Explore issue with NHS and resolve through the Infrastructure Delivery Plan.</p>
<p>Water Quality The Environment Agency require additional evidence to understand the potential impact of additional housing on water quality.</p>	<p>The water cycle study will provide evidence and additional policy/ policy wording may be required.</p>
<p>Heritage The potential of several sites to result in significant harm to heritage assets, including listed buildings and Scheduled Ancient Monuments, was raised by Historic England and Devon County Council. Although the site allocation work previously undertaken highlighted the potential impacts and policy required the issues to be addressed through the development management process, Historic England and DCC are clear that, in some cases, the work must be carried out before allocation.</p>	<p>Additional heritage impact assessments are being undertaken, and, in some cases, site promoters have been advised that additional archaeological investigation works are required.</p>
<p>Flood Risk The Environment Agency highlighted allocations that require a 'level 2' Strategic Flood Risk Assessment.</p>	<p>This work is being undertaken.</p>

- 5.5 A large number of comments and objections to the plan were in respect of sites allocated for development. At this stage of plan making it is **not** considered that a substantive review of whether sites should be removed from the plan and not shown as allocations is appropriate. Whilst appreciating many sites saw objections made, the Council did go through a comprehensive and logical exercise in reaching allocation choices. It should also be noted that, if sites were to come out of the plan in a

substantive way with anything more than minor impacts, new sites would need to be added (or other ways found) to make up housing shortfalls and the expectation is that this would delay plan production.

- 5.6 There were a very small number of cases, specifically for sites allocated for employment uses, where technical objections made were of a nature that would warrant serious consideration of site deletion (but in such cases deletion would not have significant impacts in terms of meeting minimum development requirements).
- 5.7 For some sites where there were objections, specifically from statutory bodies raising technical points of concern, it is considered that further work should be undertaken to see if these concerns can be overcome. We would seek to achieve this through additional technical evidence gathering and/or through policy changes (the expectation being of changes to policy wording rather than boundary changes to allocations – for example making it clear, or clearer, where there maybe areas of constraint on certain parts of site that would, for example, not be acceptable for built development – for example because of adverse heritage impacts that development might result in).
- 5.8 Several allocated sites are located in close proximity to Scheduled Monuments and Historic England and the DCC Archaeologist have advised that technical assessments (geophysical surveys and investigative trenching) should be undertaken prior to allocation so that their importance, setting, and likely extent are more fully understood. They would not support allocation of these sites without satisfactory technical assessment. This would inform the layout of development and ensure that subterranean remains and their settings are protected (they could, for example, be used as public open space or for informal recreation or wildlife) and policy wording would be reflect these requirements. We would still require a programme of works and recording of finds to be agreed through planning conditions. Housing site promoters have been asked to provide this further technical information. This issue affects 477 dwellings on two allocations, and 3.6ha of employment land, but it may be possible to achieve site layouts that retain this capacity whilst preserving the heritage assets.
- 5.9 Historic England and/or the Devon County Council Archaeologist have also objected to an employment site and one other site due to their potential impact on ancient monuments (parts of the monuments are believed to overlap the sites). These sites are relatively small and are subject to other technical constraints (for example, flooding and highway safety), and there is sufficient headroom in the total amount of land to be provided, that these sites could be deleted without creating a shortfall.
- 5.10 Supporting technical information has been submitted by some site promoters (or has been requested) and this is being reviewed by the Council's Conservation Team as part of further heritage impact assessment work on these sites. It is anticipated that in most (if not all) cases, harm can be minimised through detailed site layouts, careful design and landscaping within the allocated sites. This is likely to require changes to policy wording.
- 5.11 Since starting the site assessment work the legislation relating to National Landscapes has introduced a new duty for planning authorities to 'seek to further' the statutory

purposes of protected landscapes (conserving and enhancing their natural beauty) and several statutory consultees have objected on the basis that it is not clear how the Local Plan strategy and site allocations comply with this duty. In response to this, a topic paper is being produced alongside further site assessment work that specifically considers how development of sites within, adjoining, and affecting the setting of, National Landscapes can further their purposes. Opportunities to conserve and enhance the wider National Landscape are also identified. It is clear that the measures required will be individual to each site, but at this stage the assessment work suggests that careful design, layout and reinstatement of historic natural features will assist in meeting the duty and most (if not all sites) will be retained as allocations, albeit with amended policy wording setting out the works required in more detail.

- 5.12 We would envisage that any further assessment work on or related to sites would be published as addendums to the technical site assessment work/settlement specific reports that have already been published. In some cases site capacity levels in policy may need to or have scope to change. This maybe especially so for housing with some allocation sites, given constraints, potentially having only reasonable capacity for lower development levels than those referenced in the initial regulation 19 plan, but with some offering scope for greater capacity.

6 Further evidence gathering and studies

- 6.1 In the initial Regulation 19 consultation we noted that a number of evidence documents were to follow. We set out summary details below of key ongoing evidence work, in addition to matters already highlighted in this report, that will support the plan as it progresses.
- 6.2 **New community masterplan work** – local plan policy for the new community will need to be refined through on-going assessment and master planning work. Consultants are continuing to refine proposals for the new community with a masterplan to be finalised in the coming weeks. This masterplan will form a key piece of evidence to show how local plan policy can be implemented and as such will be critical to refinement (but unlikely to lead to wholesale changes) of existing policy. Whilst in some cases going beyond the strict requirements for justifying local plan policy there is a raft of related new community work that is also progressing, this includes:
- a) **Delivery vehicle assessment** – committee will be aware of work examining delivery vehicle options for the new community, with a particular focus on potential for creation of a development corporation to lead on such work. A report is also being prepared for Cabinet in July to consider potential delivery vehicle options for the new community and to include details of a strategic outline business case for a delivery vehicle. Decisions reached may be referenced or reflected on in the local plan and consultation materials.
 - b) **New towns programme submission** – committee will be aware that the council has made a submission under, and to be part of, the government's new town programme. A successful outcome could see financial, technical and wider

support to help deliver the new community. A decision from government is not expected until after the summer recess.

- c) **New town financial assessment and viability work** – this work will specifically look at viability matters at the new town, informing, amongst other considerations, the mix of uses that can be achieved, scales and rates of planned delivery, delivery of (and need for) social and community facilities and levels and provision of affordable housing.
- d) **Infrastructure delivery plan** – the new community will need to be supported by an Infrastructure delivery plan that needs to be produced. This will dovetail with or potentially merge with a plan wide Infrastructure delivery plan which already exists but which we will look to refine.

- 6.3 **Greater Exeter Transport Study** – in cooperation with neighbouring local authorities, and working with and through Devon County Council, we have commissioned consultants WSP to assess and review transport impacts arising from local plan proposals, including the New Community. This work is especially concerned with impacts on the strategic road network, as managed by National Highways (who are also a key partner in this work). The key roads, and especially junctions on to and off these roads, being the M5 motorway and the A30.
- 6.4 There are specific concerns relating to the capacity of junctions on the western edges of our district, specifically M5 J29 and J30, the A30 Airport Roundabout, and Clyst St Mary Roundabout. Whilst some capacity enhancement may be possible through modest physical improvements, the emerging assessment outputs point to a far greater emphasis on the need for green travel and movement solutions at the New Community in particular – more and better public transport and an emphasis on more walking and cycling, reducing the need to travel, co-locating new homes with places of work and social and community facilities, greater home working and actions that would help spread the load of travel more evenly throughout the day.
- 6.5 This higher level assessment also inter-relates to and with new community specific work on travel, accessibility and movement that is informing masterplan work. Specific work on a transport ‘vision and validate’ approach is also underway for the new community. The consultant’s work is scheduled to reach final conclusions and outputs in late July/early August. Interim findings have and will come out sooner and in emerging form will help inform and refine any potential local plan changes.
- 6.6 **Water cycle study** – officers have met with consultants Haskoning (formerly called Royal Haskoning) on the work and steps needed for completion of the water cycle study. It is hoped that a brief for this further work will be agreed shortly with a final study and outputs to be produced in time for the second Reg 19 consultation in October. The work is to remodel impacts on capacity in response to local plan allocations as well reconciling data from different sources. The work will be undertaken in liaison with inputs from the Environment Agency and amongst other outputs will help refinement of plan policy noting, for example where sewage infrastructure

improvements are needed and where corresponding phasing of development is appropriate, so as to align with any required or planned works.

- 6.7 **Strategic flood risk assessment** – there is some limited work to be completed on strategic flood risk matters. This includes a review of a very small number of sites that are allocated in the plan that have not been fully assessed. This work will be completed in summer 2025 and we will highlight to committee, in due course, if the work generates any policy concerns. Though even if it does mean, for example, that some allocations cannot be carried forward, it would not undermine the overall plan and the plan strategy.
- 6.8 **Pebblebed Heaths - Air quality assessment and mitigation strategy** – the need for this work was highlighted in Habitat Regulation Assessment and in due course will need to feed back into the Habitat Regulation Assessment. The work is specifically concerned with vehicle exhaust emissions, specifically nitrogen deposition, on the Pebblebed Heaths, and increases that will arise on account of new development. A key output will be to establish means, nature and projects to secure mitigation. Consultants – Ricardo Ltd – have been appointed to undertake the work and their final conclusions and final recommendations are scheduled to be out in October 2025. Early outputs from the work will, however, help refine, if needed, plan policy wording.
- 6.9 **Housing needs assessment** – Government policy specifically requires up to date housing needs assessment evidence. We have, therefore, re-commissioned ORS to do an update of their earlier work. This will be concluded in mid-2025.
- 6.10 Whilst we major on the above, we will also be doing or commissioning further work and especially updates – to include Habitat Regulation Assessment update and further Sustainability Appraisal work. There may also be need or scope to consider updates to such work as the plan viability assessment.

7 **Duty to Cooperate and Statements of common ground**

- 7.1 A matter of great relevance to plan making, as highlighted in some comments on the plan, is the need to meet Duty to Cooperate requirements. This is a legal plan making requirement to ensure local planning authorities and county councils cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. It comes into particular affect where such bodies have or may raise objections to a plan.
- 7.2 Whilst we do have some objections from such bodies on the 1st round of Regulation 19 consultation, we would hope that many could be resolved through plan changes or through setting out statements of common ground that clarify what we agree on and what we do not agree on and why and potentially setting out justification for differences (if appropriate).
- 7.3 The first thing that the inspector/s appointed to examine our plan will consider is whether we have met our duty to co-operate and, if it is found that we have not, the plan will not progress to examination of soundness. It is therefore vital that we actively

consider any issues raised under the duty to co-operate to establish whether agreement can be reached.

- 7.4 Discussions about meeting the housing requirement of other local planning authorities is an issue that has been raised in other local plans and some plans have failed to meet the duty to co-operate on these grounds. Through the Regulation 19 consultation, Torbay requested that East Devon help to meet their housing requirement and Mid Devon, Somerset, and Dorset said that they did not yet know whether they would be able to meet their housing requirement. Given the physical separation between Torbay and East Devon, it would (we would suggest) be difficult for Torbay to justify how the provision of additional housing within East Devon could meet the Torbay housing requirement. Furthermore, the environmental and other constraints of building additional housing in East Devon, rather than in or closer to Torbay, to meet a Torbay requirement would need to be properly investigated, considered and justified. However, it is relevant to note that the submission Teignbridge Local [Plan](#), which borders Torbay, included a policy (H1) on meeting possible unmet housing needs from neighbouring authorities, but the Inspectors advice was that it would be better to include explanatory text to explain that, in the event of housing not being delivered in accordance with the plan, or if the identified needs for new homes were to change, the requirements of legislation and national policy/guidance in respect of the need for a review/update of the plan would be followed. This is considered to be an appropriate means of dealing with the uncertainty of whether other local plans will be able to meet their housing requirement and it has the benefit of being suggested as a way of meeting a similar situation in a recently examined plan. Consideration will be given to whether including additional text to the local plan would deal with this issue adequately.
- 7.5 Duty to co-operate matters that have arisen through plan preparation are set out briefly in the table below. We are currently working on statements of common ground focussed on the topics listed so that they can be published alongside the second Reg.19 consultation.

Topic	Issue	Summary Notes
1A Housing	Meeting the East Devon requirement	Reg.19 plan and supporting evidence show how this can be achieved.
1B Housing	Meeting Exeter requirement	Plan is at Regulation 19 and meets Exeter's housing requirement. No request made for East Devon to meet need.
1C Housing	Meeting Teignbridge requirement	Plan is nearing adoption and meets the Teignbridge requirement.
1D Housing	Meeting Mid Devon requirement	Too early in plan making to know if Mid Devon can meet its own requirement.
1E Housing	Meeting Somerset requirement	Too early in plan making to know if Somerset can meet its own requirement.
1F Housing	Meeting Dorset requirement	Dorset plan is at Regulation 18, and it is not known whether it can meet the Dorset housing requirement.
1G Housing	Meeting Torbay requirement	In the Regulation 19 consultation Torbay requested that East Devon help to meet its housing need.

Topic	Issue	Summary Notes
1H Housing	Meeting the Gypsy and Traveller requirement	Joint evidence on permanent pitches with Exeter, Mid Devon and Teignbridge. Ongoing joint work on need for transit site/s.
2A Climate change	Mitigation	Joint work with Devon CC, Mid Devon and Exeter that informs policies of plan. Detailed recommendations from Environment Agency on Reg.19 policies to be considered for inclusion in second Reg. 19 plan.
2B Climate change	Adaptation	Substantive comments from the Environment Agency on the Reg. 18 plan were incorporated into the first Reg. 19 plan. Further, more detailed, suggestions on the first Reg. 19 plan to be considered for inclusion in second Reg. 19 plan.
3A Employment	Meeting East Devon needs	Reg.19 plan and supporting evidence show how this can be achieved.
3B Employment	Meeting the needs of others	There are questions as to whether the Exeter plan relies on provision of employment land outside of the city boundary.
4A Transport	'Greater Exeter' strategy	Further work is being undertaken with Highways England, Devon CC and other councils to understand the capacity of the transport network to accommodate growth levels.
4B Transport	Rail improvements	Improvements to the frequency of the Exeter Waterloo line are supported through plan policy.
4C Transport	Walking and cycling improvements	The Clyst Valley and New Communities Local Cycling and Walking Infrastructure Plan being prepared by Devon CC is supported through plan policy.
5A Water quality	River Axe catchment	Work on implementing mitigation measures is ongoing.
5B Water quality	River Exe catchment	At the Reg. 18 stage the Environment Agency highlighted potential impacts from cumulative growth projections in East Devon, Exeter and Mid Devon on the Exe Estuary Special Protection Area. No specific comments on the River Axe were submitted at Reg.19.
5C Water quality	Improving all East Devon water bodies	Work is ongoing with Natural England and other councils in Devon to improve our natural environment, including water quality. This is supported through plan policy but could be strengthened by policy additions.
5D Water quality	Impact of increased housing numbers	This is being assessed through the water cycle study.
6A Biodiversity	Nature recovery	There is a pipeline of biodiversity net gain delivery that can accommodate the planned level of growth.
7A Habitat mitigation	In combination impacts of proposed development on Exe Estuary SPA and	Work is ongoing but the mitigation strategy work started through the adopted local plan addresses the impacts identified.

Topic	Issue	Summary Notes
	Pebblebed Heaths SAC	
7B Habitat mitigation	Air pollution from increased traffic on Pebblebed Heaths SAC	Work is ongoing on understanding the issue and addressing impacts.
8A Landscape and seascape	Impact of windfarms	Work is ongoing on whether this issue could be resolved through policy wording and changes to the policy map – see table in Section 5 of this report.
9A Site allocations	New community	Work on this is ongoing.
9B Site allocations	Land north of Topsham	Policy WS10 provides for joint work with Exeter City Council on a Development and Infrastructure Delivery Framework to ensure development and infrastructure needs are coordinated.

8 Proposed timetable and format for consultation

8.1 In response to the matters raised in this committee report we have now drafted a revised detailed plan making timetable to get to Submission of the local plan for Examination. Key steps ahead, noting timings for committee meetings are:

- Study and assessment work by officers and appointed consultants – ongoing through the summer – with interim findings on most work coming through in July 2025 and final outputs in September and October 2025.
- Officers to complete first redraft of the local plan by mid August 2025.
- Committee to receive 1st redrafted local plan in September 2025. The aim will be for this to be at the scheduled 2 September meeting, but a special or extra meeting or meetings may need to be held or be seen as appropriate. It should be noted that we would aim to make this 1st redraft also the final redraft, but would see merit it having the contingency/flexibility to refine to a 2nd version if needed.
- In September or October committee will be asked to endorse the local plan for the 2nd round of Regulation 19 consultation. This is under council constitution [constitution-may-2025.pdf](#) Para 2.7.4 item (d).
- On the basis of the above we would envisage the 2nd round of Regulation 19 consultation running from October 2025 into November 2025. Precise dates are to be determined, and these would need to be informed by such matters as all evidence and supporting documents being completed and published at or before consultation start.
- In December 2025 through to January 2026 we would ideally hope to be able to assess and review all representations received. But we would stress that a key

determinant of achieving this will be the number and complexity of such submissions. If high levels (or complexity) of submissions are submitted then this timetabling may not be possible. But, if achievable, noting deadlines are tight, it would allow for a feedback report to go to Strategic Planning Committee in late January 2026 with a recommendation to go to Council for the plan to be submitted for Examination at a provisionally scheduled Council meeting of 18 February 2026. We would though stress that tightness of deadlines is such that, working to provisionally scheduled Council meeting dates, a report going to Council on 15 April 2026 looks more realistic. It should be noted that the Council constitution, Para 2.7.4, item (B) sets out that it is for Council to determine submission for Examination. We would need to align whatever Council meeting the plan goes to with a prior Strategic Planning Committee that would need to make a recommendation to Council.

- Plan Examination starts at the point of Submission. Assuming the plan progresses through examination at some point/s the appointed inspector or inspectors (it's now increasingly common for more than one to be appointed) will hold one or more sets of oral hearing sessions. We should also work on the basis that the inspector/s will require Main Modifications to the plan for it to be found sound. These modifications will need to be consulted on and for nearly all plans there are such modifications.
- Plan adoption will follow, subject to the inspector/s advising of acceptability, this may be expected in 2027. Depending on when in 2027 the plan is adopted will effect whether the plan has a life span of at least 15 years which is an expectation of the guidance at the point of adoption. There is a risk that the plan does not show 15 years which could be mitigated by adding an extra year to the life of the plan. However, this would require us to identify a further years housing land supply. Options for addressing this issue are currently being evaluated and will be reported on at a future meeting.

9.2 In our timetabling we need to be aware that we are progressing under transitional arrangements as set out in the 2024 version of the NPPF. Our understanding of these arrangements is that we have up until December 2026 to submit the plan for Examination. It is also worth highlighting that under the transitional arrangements the plan will be examined under the wording of the 2023 NPPF. Though doing so will generate some quirks and oddities, including where legislation may make some provisions of the 2023 NPPF redundant or not acceptable for use/application – an example of this is that the definition of “Traveller” has changed in the 2024 NPPF and our policies apply this new definition to ensure that the Plan complies with the Equalities Act and recent case law.

9 The format of the 2nd Regulation 19 Local Plan and consultation process

9.1 We would aspire to have as few changes as reasonably possible and credible in the amended version of the local plan. Any further changes should address soundness issues raised through the consultation only if possible. Where changes are made, in

papers to committee and in the consultation document, we would plan to show these as tracked changes (new text underlined and deleted text struck through).

- 9.2 For the consultation document it may well be that we number or otherwise denote changes and that we are seeking respondents to comment on the changes only and not revisit matters that are not amended from the original consultation document. We will need to submit comments received from both the 1st and 2nd rounds of consultation to the Planning Inspectorate for examination.
- 9.3 We would recommend that this second round of consultation on the plan is similar to the first, with material published on the Commonplace platform, which we will encourage people to use. We would also suggest minimising changes to the Policies Map (the mapping that shows, for example, sites that are allocated for development). But if or where changes are made we will need to determine the best way of illustrating these, so it is clear to respondents or interested parties where original lines or boundaries fell and where any new ones are located (if amendments have occurred).

10 Relationship with Neighbourhood Plans

- 10.1 Members should note that as we move forward with the new Local Plan, emerging neighbourhood plans will continue to be examined primarily for their general conformity with the adopted Local Plan (2013-2031), until such time as the new Local Plan is at least at Main Modifications stage. However, the relationship with the emerging Local Plan, as it progresses into these later stages of plan production, is increasingly relevant. Greater surety of its final content, as well as access to the complete set of supporting evidence documents, will provide a firmer basis for communities wanting to consider preparing a new or revised neighbourhood plan.

Financial implications:

This report sets the scene for the next steps in the Local Plan and the work which is being/will need to be commission, which falls within existing budgets. (AB/24/06/2025)

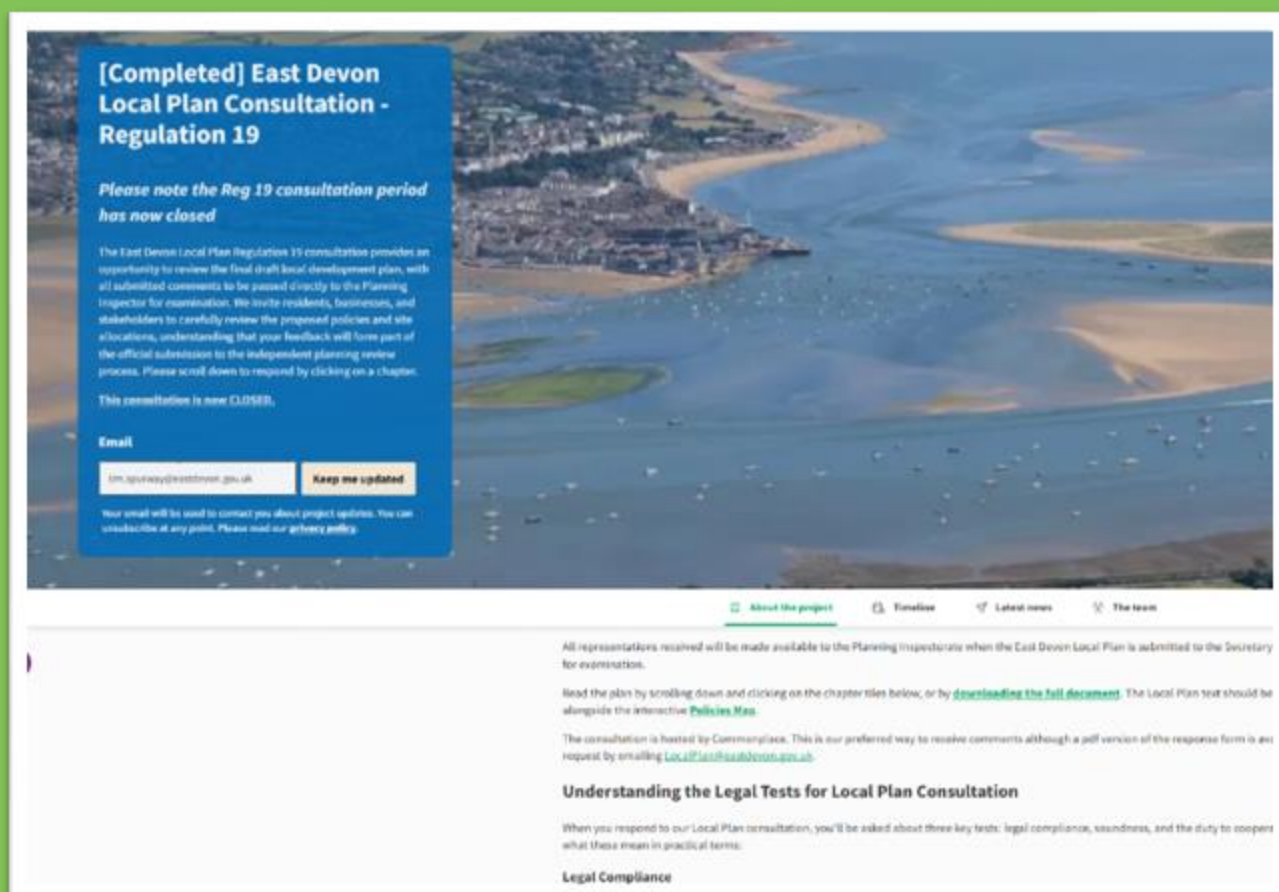
Legal implications:

There are no direct legal implications identified within this report (002533/24 June 2025/DH).

Draft Feedback Report

East Devon Local Plan (Regulation 19)

Consultation (13 Feb to Monday 31 March 2025)

A screenshot of the East Devon Local Plan Consultation website. The top section has a blue background with white text. It says "[Completed] East Devon Local Plan Consultation - Regulation 19". Below this, it says "Please note the Reg 19 consultation period has now closed". There is a paragraph of text explaining the consultation process. Below that is an email sign-up section with a text input field containing "dm.spruway@eastdevon.gov.uk" and a "Keep me updated" button. Below the button is a small disclaimer. The background of the top section is an aerial view of a coastal town and harbor. Below the blue section is a white section with a navigation bar containing links: "About the project", "Timeline", "Latest news", and "The team". The main content area of the white section contains text about representations, a link to "download the full document", and a link to "LocalPlan@eastdevon.gov.uk". It also has a section titled "Understanding the Legal Tests for Local Plan Consultation" with sub-sections for "Legal Compliance" and "Soundness".

[Completed] East Devon Local Plan Consultation - Regulation 19

Please note the Reg 19 consultation period has now closed

The East Devon Local Plan (Regulation 19) consultation provides an opportunity to review the final draft local development plan, with all submitted comments to be passed directly to the Planning Inspector for examination. We invite residents, businesses, and stakeholders to carefully review the proposed policies and site allocations, understanding that your feedback will form part of the official submission to the independent planning review process. Please scroll down to respond by clicking on a chapter.

This consultation is now **CLOSED**.

Email

Keep me updated

Your email will be used to contact you about project updates. You can unsubscribe at any point. Please read our [privacy policy](#).

[About the project](#) [Timeline](#) [Latest news](#) [The team](#)

All representations received will be made available to the Planning Inspectorate when the East Devon Local Plan is submitted to the Secretary for examination.

Read the plan by scrolling down and clicking on the chapter tiles below, or by [downloading the full document](#). The Local Plan text should be alongside the interactive [Policies Map](#).

The consultation is hosted by Commonsplace. This is our preferred way to receive comments although a pdf version of the response form is on request by emailing LocalPlan@eastdevon.gov.uk.

Understanding the Legal Tests for Local Plan Consultation

When you respond to our Local Plan consultation, you'll be asked about three key tests: legal compliance, soundness, and the duty to cooperate. What these mean in practical terms:

Legal Compliance

Executive summary

Executive Summary

The Regulation 19 consultation on the East Devon Local Plan was held from 13 February to 31 March 2025 and received considerable engagement, with 3,510 responses totalling approximately 1.1 million words. The consultation was structured around the Planning Inspectorate's model form to address procedural and legal requirements for plan production, and the legal tests of soundness set out in the National Planning Policy Framework (NPPF). Recognising the technical nature of this format, plain English guidance was provided to support public participation.

Key Themes and Issues Raised

- **Volume and Focus of Responses:** The most commented-on policy was SD01, particularly the proposed allocation of site Exmo_20, which drew over 1,100 responses and multiple petitions. Concerns centred on biodiversity, flood risk, infrastructure, and procedural fairness.
- **Housing Strategy:** There was widespread objection to the housing requirement figure of 20,909 dwellings (80% of the standard method), with calls to meet the full need of 26,136 dwellings. Respondents also criticised the stepped trajectory and over-reliance on a single new settlement.
- **Spatial Strategy and Settlement Hierarchy:** While there was broad support for focusing growth in the West End and Main Centres, concerns were raised about the under-classification of certain settlements (e.g. Feniton) and the underrepresentation of Exmouth's strategic role.
- **Infrastructure and Viability:** Many responses highlighted the need for stronger commitments to infrastructure delivery, particularly for healthcare, education, and utilities. Viability concerns were raised across multiple policies, especially in relation to affordable housing, climate policies, and biodiversity net gain.
- **Environmental Protection:** There was strong support for policies promoting biodiversity, climate resilience, and landscape protection. However, several policies were criticised for being overly rigid, duplicative of national guidance, or lacking clarity on implementation.
- **Sustainability Appraisal and Legal Compliance:** Numerous representations challenged the soundness and legal compliance of the Sustainability Appraisal, particularly regarding the allocation of Exmo_20. Concerns included inconsistencies with the HELAA, lack of consultation, and failure to apply the Mitigation Hierarchy.
- **Neighbourhood Plans and Community Engagement:** Respondents expressed frustration over the perceived marginalisation of neighbourhood plans and the usability of consultation tools. There were calls for greater transparency, responsiveness, and respect for local input.

Areas of Support

- Support was expressed for the plan's emphasis on sustainable development, climate action, and infrastructure-led growth.
- Many policies received general support in principle, particularly those related to design quality, open space, and the protection of heritage and biodiversity.

- Several site allocations were endorsed by developers and landowners as deliverable and aligned with local needs.

Next Steps

This report remains in draft form pending further checks on the AI-generated summaries, when a final version will be published. All consultation responses are intended to be made publicly available via Power BI in due course.

DRAFT

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The approach to consultation

To ensure consistency and alignment with national requirements, we adopted a standardised question format for the Regulation 19 consultation, based on the model form provided by the Planning Inspectorate. This format is designed to address whether the plan has been prepared in accordance with legal and procedural requirements and whether it meets the legal tests of soundness set out in the National Planning Policy Framework (NPPF). However, we recognise that the technical and legal language used in these questions may not be easily accessible to all members of the public.

Anticipating this, we provided plain English guidance on the consultation platform to help explain the process and terminology. This included a direct link to the Planning Inspectorate's own guidance on completing the form, to support respondents in navigating the process.

Each submission followed a consistent format. Respondents were first asked to identify the part of the plan they were commenting on. They were then invited to explain why they supported or objected to that part of the plan, specifically in relation to the legal and procedural requirements and tests of soundness, and to suggest any changes they believed were necessary to be made.

This report reflects the latter two elements of each submission: the reasons for support or objection are summarised under **Main Issues**, while the suggested changes are captured under **Calls for**.

The scale of engagement was significant. We received a total of 3,510 responses, comprising approximately 1.1 million words. Around 35% of these were submitted outside the Commonplace platform and had to be manually uploaded by officers to ensure all responses were captured in a single, consistent database.

The report breaks down the total number of responses made by policy. Approximate numbers are also provided for sites. It is noted that the two figures may not add up, as people often commented on multiple sites or topics in a single submission. The most commented-on policy by a considerable margin was Policy SD01, specifically the proposed allocation of site Exmo_20. This site attracted a high volume of responses, including multiple petitions objecting to its inclusion. These are summarised in the relevant section of this report.

To manage the volume and complexity of responses, officers used CoPilot to generate the initial summaries presented in this report. While officers have undertaken substantial checks on the outputs, further review is still required due to the scale of the task and the known limitations of AI tools. As such, this report is presented in draft form. A final version will be published once all necessary checks have been completed and any identified errors corrected.

A number of site promoters also submitted representations advocating for the inclusion of sites not currently allocated in the draft plan. These submissions typically set out the perceived

benefits of their proposed sites. A non-exhaustive list of such sites is provided below and will be expanded in the final version of this report:

- Honi_15
- Wood_24
- Brhe_07

We are also in the process of publishing all consultation responses. It is intended that these will be made publicly available using Power BI, in a format similar to that used by Teignbridge District Council for their Regulation 19 Addendum consultation - [Teignbridge Addendum Regulation 19 Responses](#). We are currently working with Strata to explore how best to implement this approach.

Response summaries

1. Introduction

Total responses: 84

Main Issues:

- Multiple respondents dispute the legal and procedural validity of the two-stage Regulation 19 consultation, arguing it does not meet the requirements of the transitional arrangements under the NPPF. (Planning consultants, developers, individuals)
- Criticism was directed at the plan's housing requirement methodology, which is seen as a misapplication of the 80% threshold intended for testing existing figures, not setting new ones. (Planning consultants, developers)
- The plan is viewed as overly reliant on a second new community, which lacks sufficient evidence and clarity, raising doubts about its deliverability. (Planning consultants, developers)
- Doubts were raised about whether the plan period will extend 15 years from adoption, as required by national policy. (Planning consultants, developers)
- The viability assessment is considered incomplete, with omissions such as the Building Safety Levy and realistic professional fees for large sites. (Planning consultants, developers)
- Some respondents flagged that policy wording is overly complex or diluted by repeated caveats, which may undermine clarity and enforceability. (Public body – Environment Agency; planning consultants)
- Developers involved in Cranbrook expressed unease about the ambiguous relationship between the new Local Plan and the Cranbrook Plan, fearing overlapping or conflicting policy burdens. (Developers)
- Frustration was expressed over the consultation process, particularly the usability of digital tools and lack of responsiveness to community feedback. (Parish councils, individuals)
- Several representations challenge the plan's treatment of neighbourhood plans, arguing that it fails to respect their content and status. (Parish councils, individuals)
- The chapter's language and structure were criticised for being unclear, jargon-heavy, and inaccessible to non-specialists. (Individuals)
- Infrastructure concerns were prominent, with respondents highlighting insufficient attention to sewage, water, healthcare, and transport capacity. (Individuals, environmental groups)
- Environmental stakeholders noted that water quality, biodiversity, and ecological protection are not sufficiently embedded in the plan. (Public body – Devon Wildlife Trust; environmental groups)
- The Policies Map was described as incomplete or inconsistent, particularly in relation to Cranbrook and settlement boundaries. (Planning consultants, developers, individuals)
- Some respondents found the presentation and grammar of the chapter lacking, suggesting it undermines the professionalism of the document. (Individuals)

Calls for:

- Provide legal clarity and justification for the two-phase Regulation 19 approach and ensure full compliance with transitional arrangements. (Planning consultants, developers)

- Revise the housing strategy to meet full local need and extend the plan period to ensure a 15-year horizon post-adoption. (Planning consultants, developers)
- Update the viability assessment to include all relevant costs and ensure policies are realistically deliverable. (Planning consultants, developers)
- Streamline policy language and consolidate viability caveats into a single, clear policy. (Public body – Environment Agency)
- Clarify the interaction between the Local Plan and Cranbrook Plan to avoid duplication or unintended policy burdens. (Developers)
- Improve consultation accessibility, including better mapping tools, clearer documentation, and more responsive engagement. (Parish councils, individuals)
- Strengthen the role of neighbourhood plans and ensure they are respected in decision-making. (Parish councils, individuals)
- Add a glossary and index to improve readability and navigation. (Individuals)
- Embed infrastructure planning more deeply into the spatial strategy, with clear commitments to delivery. (Individuals, environmental groups)
- Reinforce environmental priorities, including water quality, biodiversity, and ecological assessment. (Public body – Devon Wildlife Trust; environmental groups)
- Ensure the Policies Map is accurate, complete, and aligned with supporting evidence. (Planning consultants, developers, individuals)
- Rewrite the chapter for clarity, professionalism, and accessibility. (Individuals)

2. The Vision

Total responses: 47

Main Issues:

- Concern that the vision underrepresents the need to meet full housing needs and address the national housing crisis. (Planning consultants, developers)
- Concern that the vision places disproportionate emphasis on environmental constraints at the expense of housing delivery. (Planning consultants, developers)
- Support for the vision's emphasis on sustainable development, climate action, and infrastructure delivery. (Public body – National Highways; public body – NHS Devon Integrated Care Board; planning consultants, developers, individuals)
- Concern that the vision lacks clarity on how infrastructure, particularly healthcare and education, will be delivered alongside development. (Public body – NHS Devon Integrated Care Board; individuals)
- Concern that the vision does not adequately reflect the importance of water quality, natural watercourses, and pollution mitigation. (Environmental groups, individuals)
- Concern that the vision does not sufficiently reference the statutory protection of designated nature conservation sites. (Public body – RSPB)
- Concern that the vision lacks commitment to measurable biodiversity net gain. (Environmental groups, individuals)

- Concern that the vision does not reflect the full scope of the historic environment, focusing too narrowly on built heritage. (Public body – Historic England; public body – Devon County Council)
- Concern that the vision lacks mechanisms to ensure infrastructure is delivered in tandem with development. (Individuals)
- Concern that the vision lacks realism about the viability and deliverability of development sites. (Planning consultants, individuals)
- Concern that the vision does not reflect the importance of proportional development in rural areas. (Individuals)
- Concern that the vision lacks reference to the statutory status and correct terminology for the Jurassic Coast World Heritage Site. (Public body – Jurassic Coast World Heritage Site Team)

Calls for:

- Rebalance the vision to explicitly commit to meeting housing needs in full, including through the allocation of sufficient land. (Planning consultants, developers)
- Strengthen references to infrastructure delivery, including mechanisms for ensuring timely provision of healthcare, education, and utilities. (Public body – NHS Devon Integrated Care Board; individuals)
- Include explicit references to statutory nature conservation sites (e.g. Exe Estuary SPA, East Devon Heaths SAC/SPA). (Public body – RSPB)
- Replace “support” with “achieve” or “deliver” in relation to biodiversity net gain. (Environmental groups, individuals)
- Broaden references to the historic environment to include landscapes, archaeology, and non-visible heritage assets. (Public body – Historic England; public body – Devon County Council)
- Add references to water quality and the role of the planning system in protecting natural watercourses. (Environmental groups)
- Include a commitment to proportional development and prioritisation of brownfield land. (Individuals)
- Clarify the role of the West End of East Devon as a strategic growth area and its relationship with unmet needs from Exeter. (Planning consultants, developers)
- Ensure consistency in terminology and references to the Jurassic Coast World Heritage Site. (Public body – Jurassic Coast World Heritage Site Team)

3. Spatial Strategy

Total responses: 293

SP01: Spatial strategy

Total responses: 83

Main Issues:

- Broad support for focusing development at the West End due to its sustainability, infrastructure, and proximity to Exeter. (Developers, Planning Consultants)

- Concern that Exmouth is under-emphasised despite being the Principal Centre with significant growth potential. (Planning Consultants, Individuals)
- Objection to the classification of villages such as Lympstone and Feniton as Local Centres, citing limited services and infrastructure. (Parish Councils, Individuals)
- Concern over over-reliance on Cranbrook and the proposed new community given long delivery lead times. (Developers, Planning Consultants)
- Lack of clarity around the definition and boundaries of the “West End” undermines transparency. (Individuals)

Calls for:

- Elevate Exmouth’s strategic role and increase its housing allocation to reflect its size and sustainability. (Planning Consultants)
- Reclassify Lympstone and Feniton to Tier 4 Service Villages to better reflect their infrastructure capacity. (Parish Councils)
- Provide a clear definition and mapping of the “West End” to improve policy clarity. (Individuals)
- Reduce reliance on strategic sites and diversify allocations across more settlements to improve delivery. (Developers)
- Adopt an infrastructure-first approach, particularly for transport and wastewater, to ensure sustainable development. (Environment Agency, Planning Consultants)

SP02: Levels of future housing development

Total responses: 70

Main Issues:

- The housing requirement of 20,909 dwellings represents only 80% of the Standard Method output, which is widely seen as a missed opportunity to meet full housing need. (Developers, Planning Consultants)
- The stepped housing trajectory is viewed as unjustified and risks under-delivery in the early years of the plan. (Developers, Planning Consultants)
- The plan lacks flexibility to respond to changes in housing need or delivery rates, especially given its reliance on large strategic sites. (Developers)
- The justification for the housing target appears to be driven more by transitional arrangements than by robust local evidence. (Developers, Planning Consultants)
- Concerns from individuals that the plan focuses too much on quantity rather than the right type of housing—such as affordable, accessible, or smaller homes—and fails to address underused or vacant housing stock. (Individuals)

Calls for:

- Increase the housing requirement to meet 100% of the Standard Method output (1,188 dwellings per annum). (Developers, Planning Consultants)
- Remove or revise the stepped trajectory to ensure consistent delivery throughout the plan period. (Developers, Planning Consultants)
- Introduce flexibility mechanisms—such as reserve sites or contingency allocations—to respond to under-delivery or unforeseen constraints. (Developers)
- Provide clearer, locally grounded justification for the housing target, rather than relying on

transitional compliance under the NPPF. (Planning Consultants)

- Prioritise use of existing housing stock, limit second homes, and ensure new developments meet diverse local needs, including multigenerational and accessible housing. (Individuals)

SP03: Housing requirement by Designated Neighbourhood Area

Total responses: 21

Main Issues:

- Broad support for the principle of setting minimum housing requirements for neighbourhood areas, with recognition that this provides clarity and flexibility. (Developers, Planning Consultants)
- Concern that the figures are derived from a housing requirement that only meets 80% of the Standard Method, which may underdeliver against actual need. (Developers, Planning Consultants)
- The stepped trajectory and reliance on neighbourhood plans—given their voluntary nature—are seen as unreliable for ensuring delivery. (Developers, Home Builders Federation)
- The inclusion of large strategic allocations (e.g. Cobdens) within neighbourhood area totals (e.g. Whimble) is seen as misleading and inconsistent with the spatial strategy. (Planning Consultants)
- Individuals raised concerns about perceived unfairness in distribution—e.g. Lymington's high allocation compared to larger settlements like Budleigh Salterton—and the lack of transparency in how figures were derived. (Individuals)
- Some individuals and parish councils expressed frustration that they were instructed not to include housing targets in emerging neighbourhood plans, yet are now criticised for not doing so. (Individuals, Parish Councils)

Calls for:

- Reiterate and clarify that the figures are minimums and not caps, both in the policy text and the table, to encourage appropriate additional growth. (Planning Consultants, Developers)
- Exclude strategic allocations like Cranbrook from neighbourhood area totals to avoid confusion and better reflect settlement-level planning. (Planning Consultants)
- Increase housing requirements to reflect 100% of the Standard Method output and ensure consistency with national policy. (Developers, Home Builders Federation)
- Provide clearer guidance and support for neighbourhood planning groups, especially where they were previously advised not to allocate housing. (Individuals, Parish Councils)
- Reassess the sustainability scoring of settlements and allow local discretion to support small-scale growth in villages currently deemed “unsustainable.” (Individuals)

SP04: Employment provision and distribution strategy

Total responses: 18

Main Issues:

- The proposed 178.16 hectares of employment land significantly exceeds the 80-hectare need identified in the EDNA, with insufficient justification for this oversupply. (Planning Consultants, Developers)
- The inclusion of 17.5 hectares at the second new community is seen as unrealistic given its early planning stage. (Planning Consultants)
- The policy is too narrowly focused on traditional employment use classes (B2, B8, E(g)), lacking flexibility to accommodate emerging sectors and non-traditional employment-generating uses. (Developers, Planning Consultants)
- Some allocations are questioned due to their location in sensitive areas (e.g. national landscapes, heritage sites) or lack of supporting evidence. (Historic England, Planning Consultants)
- Infrastructure and transport concerns were raised, particularly regarding the concentration of employment land in the West End and its impact on the strategic road network. (National Highways)

Calls for:

- Allocate more employment land in market-facing, sustainable locations like Hill Barton, Greendale, and land north of Sowton, and reduce reliance on uncertain sites. (Developers, Planning Consultants)
- Broaden the definition of employment uses to include a wider range of Class E and other employment-generating activities such as tourism, leisure, and community services. (Developers, Planning Consultants)
- Introduce flexibility in the policy to adapt to changing economic conditions and allow alternative uses where justified. (Developers, Planning Consultants)
- Update the EDNA and clarify how post-COVID trends and shifts in demand have been accounted for. (Devon County Council)

SP05: Development inside Settlement Boundaries

Total responses: 5

Main Issues:

- While the principle of supporting development within settlement boundaries is broadly accepted, the policy wording is seen as overly restrictive—particularly in discouraging neighbourhood plans from allocating sites outside these boundaries. (Planning Consultants)
- Several respondents raised concerns about the redefinition or exclusion of specific properties or areas from settlement boundaries, particularly in Lypstone, where changes were made without consultation and appear to contradict sustainability principles. (Individuals, Parish Councils)
- The policy lacks a clear and robust definition of what constitutes a “settlement boundary,” leading to potential confusion with parish boundaries or built-up area boundaries. (Individuals)
- The allocation of certain areas as green wedge—such as central village plots near public transport—was criticised as inconsistent with the plan’s sustainability objectives. (Individuals)

Calls for:

- Amend the policy to allow neighbourhood plans greater flexibility to allocate land outside settlement boundaries where justified by local evidence of unmet need. (Planning Consultants)
- Reinstate specific properties (e.g. Hillcroft, Burgmann's Hill) within settlement boundaries where they are demonstrably sustainable locations. (Individuals)
- Provide a clear and consistent definition of "settlement boundary" and its relationship to other boundary types. (Individuals)
- Reconsider or remove green wedge designations in central, well-connected village locations, and ensure boundary changes are transparently justified and consulted on. (Individuals, Parish Councils)

SP06: Development beyond Settlement Boundaries

Total responses: 14

Main Issues:

- The policy is viewed as overly restrictive, offering limited flexibility for development outside settlement boundaries—even in sustainable locations or where there is unmet housing or employment need. (Developers, Planning Consultants)
- There is concern that SP06 contradicts other policies (e.g. SP05 and HN02) and the NPPF, particularly regarding the role of windfall development and the need to maintain a five-year housing land supply. (Planning Consultants, Developers)
- The policy assumes full delivery of allocations and windfalls, without contingency for under-delivery or market shifts. (Planning Consultants)
- The lack of a clear and consistent definition of "settlement boundary" (vs. built-up area or parish boundary) creates confusion for decision-makers and communities. (Individuals)

Calls for:

- Amend the policy to explicitly allow development outside settlement boundaries where justified by local or neighbourhood plan policies, or where needed to maintain housing or employment land supply. (Planning Consultants, Developers)
- Introduce flexibility for sustainably located sites, especially where they support local services or align with the spatial strategy. (Developers)
- Clarify the relationship between SP06 and other policies (e.g. SP05, HN02) to ensure consistency and avoid undermining windfall contributions. (Planning Consultants)
- Provide a robust and unambiguous definition of "settlement boundary" and how it relates to other boundary types. (Individuals)

SP07: Delivery of infrastructure

Total responses: 27

Main Issues:

- Broad support exists for the principle of ensuring infrastructure is delivered alongside development, but many respondents argue the policy lacks clarity, enforceability, and flexibility. (Developers, Local Authorities, Infrastructure Providers)
- Several representations object to the requirement for development to support the “wider community,” arguing this conflicts with the legal tests for planning obligations under Regulation 122. (Planning Consultants, Developers)
- Concerns were raised about the policy’s vagueness regarding who is responsible for infrastructure assessments, particularly for strategic sites where this should already be addressed in the Local Plan. (Parish Councils, Environment Agency)
- The policy is seen as insufficiently robust in addressing critical infrastructure issues—especially wastewater treatment, education, healthcare, and transport—many of which are already under pressure. (Environment Agency, NHS, Devon County Council, National Highways, Individuals)
- The policy does not adequately reflect the need for viability considerations or mechanisms to ensure long-term maintenance and monitoring of infrastructure. (Developers, Environment Agency, RSPB)

Calls for:

- Remove or revise the reference to supporting the “wider community” to ensure compliance with Regulation 122 and national policy. (Planning Consultants, Developers)
- Add flexibility for viability assessments where infrastructure requirements may affect scheme deliverability. (Developers)
- Strengthen the language around long-term maintenance and monitoring of infrastructure, particularly for green infrastructure and SANGs. (Environment Agency, RSPB)
- Clarify responsibilities for infrastructure assessments, especially distinguishing between strategic and non-strategic sites. (Parish Councils, Environment Agency)
- Explicitly reference the need for infrastructure to support blue light services, education, and healthcare, and ensure these are prioritised in funding mechanisms such as Section 106. (Devon County Council, NHS, Devon & Cornwall Police)
- Ensure the Infrastructure Delivery Plan (IDP) is up to date, comprehensive, and aligned with other strategic plans (e.g. Greater Exeter Transport Strategy, South West Water Business Plan). (National Highways, Environment Agency, Individuals)

SP08: Phased Delivery of Infrastructure and Services

Total responses: 16

Main Issues:

- The principle of requiring phased developments to deliver infrastructure and access to parcel boundaries is broadly supported, particularly for ensuring coordinated delivery and avoiding ransom scenarios. (Developers, Planning Consultants)
- However, several respondents argue that the policy duplicates existing legislation (e.g. Section 38 of the Highways Act) and regulatory standards, and should avoid repeating or enforcing requirements already covered elsewhere. (Planning Consultants)

- Concerns were raised about the clarity and enforceability of the policy, especially in multi-developer scenarios where coordination may be difficult. (Home Builders Federation, Parish Councils)
- The phrase “up to the boundaries” was criticised for being too rigid or ambiguous, with suggestions to reword it to ensure flexibility and alignment with neighbouring parcels. (Environment Agency, Developers)
- Respondents highlighted the need for stronger guarantees around the delivery of wastewater infrastructure, education, and ecological mitigation (e.g. SANGs), which are not sufficiently addressed in the current policy. (Environment Agency, RSPB, Parish Councils, Individuals)

Calls for:

- Retain the core requirement for phased infrastructure delivery but remove or revise references to other consenting regimes (e.g. s38 approvals) to avoid duplication. (Planning Consultants)
- Reword “up to the boundaries” to ensure alignment with infrastructure on neighbouring parcels and avoid disjointed delivery. (Environment Agency, Developers)
- Strengthen the policy to ensure timely delivery of wastewater treatment, particularly in areas with existing capacity issues. (Individuals, Parish Councils)
- Include explicit reference to ecological mitigation measures (e.g. SANGs) and the need to monitor their effectiveness. (RSPB)
- Ensure that infrastructure delivery is not deferred due to economic constraints and that strategic infrastructure is planned and funded comprehensively, not piecemeal. (Parish Councils, Individuals)

4. Development in the West End

Total responses: 166

WS01: Development of a second new community east of Exeter

Total responses: 65

Main Issues:

- Concerns that the delivery of 3,300 homes by 2042 is unrealistic due to lack of a delivery model, masterplan, or infrastructure strategy. (Planning consultants, developers)
- Objection to over-reliance on a single strategic site to meet housing needs without sufficient contingency or alternative allocations (e.g. Addlepool Farm, Greenhayes, Wares Farm, Hill Barton. (Planning consultants, developers)
- Lack of clarity on how the masterplan, infrastructure delivery strategy, phasing strategy, and financial appraisal will be agreed and implemented. (Planning consultants, developers)
- Concerns about the viability of delivering infrastructure in step with housing, particularly education, wastewater treatment, and flood mitigation. (Public body – Devon County Council, Public body – Environment Agency)

- Absence of references to policing and healthcare infrastructure, which are considered essential for a safe and sustainable community. (Public body – Devon and Cornwall Police, Public body – NHS Devon ICB)
- Need to safeguard the 132kV overhead electricity line that crosses the site and integrate it into the masterplan. (Public body – National Grid Electricity Distribution)
- Request for stronger commitments to conserving heritage assets and integrating them into the new community's identity. (Public body – Historic England)
- Support for inclusion of places of worship and early involvement in infrastructure planning. (Public body – Diocese of Exeter)
- Objection to proximity of development to existing properties and suggestion of alternative locations. (Individuals)

Calls for:

- Reduce the assumed delivery figure for the plan period and allocate additional sites to ensure flexibility and resilience (e.g. Addlepool Farm, Greenhayes, Wares Farm, Hill Barton. (Planning consultants, developers)
- Clarify the process and timing for the masterplan, infrastructure delivery strategy, and phasing plan. (Planning consultants, developers)
- Include specific references to safeguarding utilities and integrating existing infrastructure. (Public body – National Grid Electricity Distribution)
- Strengthen policy wording to include police and healthcare infrastructure. (Public body – Devon and Cornwall Police, Public body – NHS Devon ICB)
- Add clearer commitments to heritage conservation and high-quality, locally inspired design. (Public body – Historic England)
- Ensure early delivery of education and community infrastructure, and coordinate phasing with infrastructure triggers. (Public body – Devon County Council, Public body – Environment Agency)
- Recognise the role of faith-based organisations in community building and service delivery. (Public body – Diocese of Exeter)
- Relocate the proposed development further from existing residential properties. (Individuals)

WS02: Development within the Enterprise Zone

Total responses: 2

Main Issues:

- Concerns that the policy repeats the failed approach of the Science Park and Sky Park, which have struggled to repay loans and deliver on their original objectives. (Parish council)
Criticism that the policy lacks clarity on key terms such as “large scale” warehousing and “high value” employment. (Parish council)
- Doubts raised about the functionality and capacity of the district heating schemes at Sky Park and Monkerton, which the policy requires new development to connect to. (Parish council)
- Calls for stronger environmental safeguards and clearer definitions of biodiversity and climate resilience expectations. (Public body – Devon Wildlife Trust)

Calls for:

- Clarify what constitutes “large scale” warehousing and “high value” employment. (Parish council)
- Review the performance and capacity of the district heating schemes before mandating connections. (Parish council)
- Strengthen the policy wording to explicitly require biodiversity net gain and climate resilience. (Public body – Devon Wildlife Trust)

WS03: Exeter Science Park

Total responses: 1

Main Issues:

- Policy includes the phrase ‘supporting green and grey infrastructure’. (Public body – Devon Wildlife Trust)

Calls for:

- Terminology should be strengthened to state ‘delivery of high quality green infrastructure’. (Public body – Devon Wildlife Trust)

WS04: Land north of the Science Park

Total responses: 2

Main Issues:

- Request for the policy to reflect the need for appropriate education contributions to support development. (Public body – Devon County Council)

Calls for:

- Amend the policy to include reference to education infrastructure contributions. (Public body – Devon County Council)
- Strengthen requirement for high quality green infrastructure delivery (Public Body – Devon Wildlife Trust)

WS05: Exeter Airport and its future operation and development

Total responses: 3

Main Issues:

- Concerns about the restrictive nature of the policy regarding development north and south of the runway. (Planning consultant)
- Need for flexibility in allowing appropriate development within the airport’s operational boundaries. (Planning consultants)
- Clarification needed on safeguarding and noise contour provisions. (Planning consultants)
- Objection to exclusion of the Cranbrook Plan area from the policy scope. (Planning consultants)

Calls for:

- Allow flexible development across the operational boundary. (Planning consultants)
- Clarify safeguarding provisions and noise contour implications. (Planning consultants)

- Delete reference excluding the Cranbrook Plan area. (Planning consultants)
- Need to refer to the conservation and enhancement of heritage assets including St Michaels Church and WWII heritage (Historic England)

WS06: Land east of the airport

Total responses: 7

Main Issues:

- Support for employment allocation but concerns about traffic impacts on Long Lane/B3184 junction. (Planning consultants)
- Calls for greater flexibility in masterplanning requirements. (Planning consultants)
- Need for foul drainage solution due to lack of mains sewer connection. (Public body – Environment Agency)

Calls for:

- Amend policy to allow phased development and clarify masterplan approval process. (Planning consultants)
- Include requirement for foul drainage strategy. (Public body – Environment Agency)

WS07: Employment land north of the airport, adjoining Treasbeare

Total responses: 4

Main Issues:

- Concerns about flood risk and the need for a sequential approach to site layout. (Public body – Environment Agency)
- Need to conserve and enhance designated and non-designated heritage assets. (Public body – Historic England)
- Strategy I required to mitigate increased emissions resulting from the development (Public Body – RSPB)

Calls for:

- Amend flood risk wording to reflect sequential test principles. (Public body – Environment Agency)
- Include reference to conserving heritage assets, including Treasbeare Farmhouse. (Public body – Historic England)

WS08: Employment land opposite airport buildings, south of A30

Total responses: 4

Main Issues:

- Support for allocation but request to expand boundary to include adjacent land. (Developers)
- Clarification needed on flood risk assessment due to surface water risks. (Public body – Environment Agency)

Calls for:

- Expand allocation boundary to include adjacent land. (Developers)

- Clarify flood risk assessment requirements. (Public body – Environment Agency)

WS09: Clyst Valley Regional Park

Total responses: 23

Main Issues:

- Support for the park's expansion but concerns about clarity of policy wording and boundaries. (Planning consultants, developers)
- Objections to inclusion of developed land within the park, which could impede future development. (Planning consultants, developers)
- Concerns about the viability of contributions to CVRP targets. (Planning consultants, developers)
- Need for stronger heritage protections and clearer references to the CVRP Masterplan. (Public body – Historic England)
- Request for improved sustainable travel links and integration with Killerton Estate. (Public body – National Trust)
- Concerns about removal of references to carbon sequestration and climate resilience. (Public body – Environment Agency)

Calls for:

- Clarify terms such as “adjacent” and “close” and remove vague references to external documents. (Planning consultants, developers)
- Delete or clarify Criterion F regarding proportionate contributions. (Planning consultants, developers)
- Reinstate references to climate resilience and carbon sequestration. (Public body – Environment Agency)
- Include heritage objectives and protections. (Public body – Historic England)
- Strengthen links to Killerton Estate and pedestrian/cycle infrastructure. (Public body – National Trust)

WS10: Development next to the M5 and north of Topsham

Total responses: 16

Main Issues:

- Support for the allocation but concerns about rigid masterplan requirements delaying delivery. (Planning consultants)
- Need for flexibility to allow early phases to come forward independently. (Planning consultants)
- Concerns about loss of priority habitats and need for stronger biodiversity and green infrastructure commitments. (Public body – Natural England, Devon Wildlife Trust)
- Concerns about flood risk and need for masterplan to reflect this. (Public body – Environment Agency)
- Request for protection of heritage assets, including Clyst St Mary Bridge. (Public body – Historic England)

- Clarification needed on education infrastructure wording. (Public body – Devon County Council)

Calls for:

- Allow phased development where it does not prejudice wider delivery. (Planning consultants)
- Include reference to heritage protection for Clyst St Mary Bridge. (Public body – Historic England)
- Clarify flood risk and education infrastructure requirements. (Public bodies – Environment Agency, Devon County Council)
- Traffic mitigation and protection of M5 infrastructure. (National Highways)
- Clearer education infrastructure commitments. (Devon County Council)

WS11: Gypsy and traveller site east of M5

Total responses: 16

Main Issues:

- Concerns about flood risk and the need for all development to be in Flood Zone 1. (Public bodies – Environment Agency, Devon County Council)
- Need for foul drainage infrastructure. (Public body – Environment Agency)
Objections to the site's suitability due to noise, flood risk, and lack of infrastructure. (Individuals, Parish Council)
- Impact on ancient monument/heritage asset (Devon County Council)

Calls for:

- Strengthen flood risk wording to require all development in Flood Zone 1. (Public bodies – Environment Agency, Devon County Council)
- Include foul drainage infrastructure requirements. (Public body – Environment Agency)

WS12: Employment land at Sandygate

Total responses: 1

Main Issues:

Need for mitigation to avoid traffic impacts on the Long Lane/B3184 intersection. (Public body – National Highways)

Calls for:

Include reference to contributions toward wider strategic transport improvements. (Public body – National Highways)

WS13: Employment land at Lodge Trading Estate, Broadclyst

Total responses: 4

Main Issues:

- Support for flood risk assessment and request for habitat enhancement. (Public body – Environment Agency)

- Location adjacent to or containing Ancient Woodland or Ancient and Veteran trees (Public body – Woodland Trust)

Calls for:

- Encourage habitat enhancement alongside flood risk avoidance. (Public body – Environment Agency)
- Design and layout which protects and enhances the area (Public body – Devon Wildlife Trust)
- May need contribution to wider strategic highway improvements (National Highways)
- Traffic mitigation/active travel improvements needed (Network Rail)

WS14: Employment land south of Langdon's Business Park, Clyst St Mary

Total responses: 0

Main Issues:

- No objections raised in the consultation responses specific to this policy.

Calls for:

- No specific calls for change identified.

WS15 – Darts Farm

Total responses: 7

Main Issues:

- Support for mixed-use development. (Planning Consultants / Developers)
- Object to inclusion of land within CVRP and Green Wedge. (Planning Consultants / Developers, Individuals)
- Lack of archaeological assessment. (Devon County Council)

Calls for:

- Clarification of access and mitigation requirements. (Devon County Council)
- Need to consider impacts of the scheme on the Exe Estuary SPA by qualified ecologist (Devon County Council)
- Removal of land from CVRP designation. (Planning Consultants / Developers)

5. Development in the Towns and Villages

Total responses: 1867

SD01 - Exmouth and its development allocations

Total responses: 1398

**Exmo_20 – Land at St John's
(approx. 1110 responses)**

Main Issues:

- Harm to the Pebblebed Heaths SAC/SPA: concerns include air quality, recreational pressure, and habitat fragmentation. (Devon Wildlife Trust, RSPB, Natural England, Environment Agency, Individuals)
- Loss of biodiversity, ancient woodland, and wildlife corridors. (Devon Wildlife Trust, Individuals)
- Adverse impact on the setting of St John in the Wilderness Church (Grade II*) and other heritage assets. (Historic England, Individuals)
- Loss of tranquillity, dark skies, and rural character. (Historic England, Individuals)
- Flood risk due to clay soils and upstream location relative to Withycombe Brook. (Environment Agency, Individuals)
- Poor access from B3179 and Southern Wood; concerns about traffic, safety, and sustainability. (Devon County Council, Individuals)
- Unsustainable location due to distance from services and facilities. (National Highways, Individuals)
- Allegations of procedural flaws: site not properly consulted on at Regulation 18 stage. (Individuals, Community Groups)
- Support for the allocation and its deliverability. (Planning Consultant/Developer)

Calls for:

- Clearer flood risk policy language. (Environment Agency)
- Inclusion of heritage protection criteria. (Historic England)
- Removal of site. (Community Groups, Individuals)

Exmo_17 – Land to the South of Littleham
(approx. 115 responses)

Main Issues:

- Development within a designated National Landscape (formerly AONB) is strongly opposed. (Historic England, Individuals)
- Potential harm to the setting of St Margaret and St Andrews Church and surrounding historic landscape. (Historic England, Individuals)
- Concerns about traffic, access, and pressure on local infrastructure and services. (Individuals)
- Support for the allocation and its deliverability. (Planning Consultant/Developer)

Calls for:

- Enhanced landscape protection measures. (Historic England)
- Improved traffic and infrastructure planning. (Individuals)

Exmo_23 – Land to the South of Courtlands Lane
(approx. 13 responses)

Main Issues:

- Visual impact and proximity to National Trust land, particularly the estuary fringe. (National Trust)
- Support for the allocation and its deliverability. (Planning Consultant/Developer)

Calls for:

- Consideration of visual impact mitigation. (National Trust)

Lymp_07 – Land at Courtlands Cross
(approx. 18 responses)

Main Issues:

- Harm to the estuary fringe and green wedge. (National Trust)
- Impact on heritage assets and wildlife corridors. (RSPB, Individuals)
- Support for the allocation and its deliverability. (Planning Consultant/Developer)

Calls for:

- Protection of heritage assets and wildlife corridors. (RSPB)
-

Exmo_47 – Land west of Hulham Road
(approx. 7 responses)

Main Issues:

- Heritage concerns due to proximity to Grade I listed Point-in-View Chapel and Registered Park and Garden. (Historic England)
- Support for the allocation and its deliverability. (Planning Consultant/Developer)

Calls for:

- Heritage impact assessments. (Historic England)
-

Lymp_14 and Exmo_04a – Coles Field and Marley Drive
(approx. 7 responses)

Main Issues:

- Biodiversity concerns, including proximity to ancient woodland and sensitive habitats. (Natural England, Individuals)
- Support for the allocations and arguments for increased housing numbers. (Planning Consultant/Developer)

Calls for:

- Enhanced biodiversity protection measures. (Natural England)
-

SD02: Axminster and its development allocations

Total responses: 28

Axmi_22 - Land east of Lyme Road
(approx. 4 responses)

Main Issues:

- Objection to safeguarding land for a “possible future relief road”:
 - Lack of evidence for its necessity or deliverability.
 - Viability concerns raised in previous consultations and committee meetings.
 - Risk of delaying housing delivery. (Planning Consultant)
- General support for allocation and housing delivery. (Developer)

Calls for:

- Access requirements to be clarified through changes to policy wording. (Devon County Council)
- Removal of the requirement to safeguard land for a “possible future relief road”. (Planning Consultant)

- Rewording of policy to reflect realistic delivery expectations. (Planning Consultant)

GH/ED/80a - Prestaller Farm, Beavor Lane
(approx. 4 responses)

Main Issues:

- Concerns about:
 - Flood risk and drainage.
 - Access via Sector Lane and impact on local infrastructure.
 - Agricultural pollutants and previous site unsuitability. (Individuals)
- Objection to inclusion due to previous removal from plan and unresolved constraints. (Individual)
- Support for allocation and community hub. (Planning Consultant)
- Support for use of adjacent land for biodiversity and open space. (Developer)

Calls for:

- Removal of the site from the plan due to unresolved access and pollution issues. (Individual)
- Reconsideration of the site's inclusion based on previous assurances and unchanged constraints. (Individual)

GH/ED/83 - Land west of Chard Road
(approx. 2 responses)

Main Issues:

- Omission of flood risk considerations despite proximity to River Axe. (Environment Agency)
- Concerns about impact on River Axe ecosystem and flooding at Weycroft. (Individual)

Calls for:

- Inclusion of flood risk assessment requirements in the policy text. (Environment Agency)
- Relocation of development to alternative sites further from the River Axe. (Individual)

Axmi_01a - Land west of Musbury Road
(approx. 3 responses)

Main Issues:

- Proximity to Newenham Abbey Scheduled Monument and Roman Fort. (Historic England)
- Allocation may not be justified because area of flood risk separates site from urban edge'. (Historic England)
- Road safety concerns on A35 due to additional turning movements. (National Highways)

Calls for:

- Removal of the site due to oversupply of employment land and proximity to heritage assets. (Historic England)
- Strengthening of policy wording to ensure historic environment is considered. (Historic England)
- Reference to the proximity of the strategic road network and road safety concerns. (National Highways)

Axmi_02, Axmi_08, Axmi_09 - Land east of Musbury Road
(approx. 6 responses)

Main Issues:

- Heritage and archaeological sensitivity due to proximity to Roman Fort and Fosse Way. (Historic England, Devon County Council)
- Support the requirement for a masterplan on this site, especially to suitably manage the flood risks. (Environment Agency)
- Road safety concerns on A35 due to additional turning movements. (National Highways)
- Objection to employment allocation and community hall viability. (Planning Consultant)
- Road safety and access issues on Musbury Road. (Individuals)
- Inadequate sewerage infrastructure and surface water flooding. (Individual)
- Support for residential allocation and comprehensive masterplanning. (Developer)

Calls for:

- Removal of the site due to archaeological sensitivity and setting impacts. (Historic England)
- Desk-based assessment and site evaluation before allocation. (Historic England)
- Reference to the proximity of the strategic road network and road safety concerns. (National Highways)
- Clarification of community hall need and delivery mechanism. (Planning Consultant)
- Rewording of bus stop requirements to reflect deliverability and best practice. (Planning Consultant)
- Flood mitigation and drainage infrastructure upgrades. (Individuals)
- Road safety improvements and alternative access routes. (Individuals)
- Removal of the site due to cumulative infrastructure and environmental constraints. (Individuals)

Axmi_11c - Land east of Lyme Close
(approx. 1 response)

Main Issues:

- Confusion over site reference inconsistencies (Axmi_11a vs Axmi_11c). (Individual)

Calls for:

- Clarification of site reference inconsistencies between SD02 and SP04. (Individual)

Axmi_23 - Websters Garage, 9 Lyme Street
(approx. 1 response)

Main Issues:

- Need for stronger heritage protection language. (Historic England)

Calls for:

- Adjustment of policy wording to better align with heritage legislation and national policy. (Historic England)

Axmi_24 – Land west of Prestaller Farm
(approx. 1 response)

Main Issues:

- Objection to statement that development is dependent on neighbouring sites. (Developer)

Calls for:

- Correction of policy text regarding access dependency on neighbouring sites. (Developer)

SD03: Honiton and its development allocations

Total responses: 51

Gitti_03, Gitti_04 and Gitti_05 - Land west of Hayne Lane (approx. 8 responses)

Main Issues:

- Support for the allocation and commitment to delivery of 310 homes and 14.6 ha of employment/community land. (Landowner/Developer)
- Request for flexibility in permitted uses to include wider commercial and leisure uses. (Landowner/Developer)
- Concerns about sole vehicular access via Meadow Acre Road; alternative access via Hayne Lane and Higher Ash Close proposed. (Landowner/Developer)

Calls For:

- Acknowledge submitted masterplan and commitment to comprehensive development. (Landowner/Developer)
- Allow flexibility in employment land use definitions. (Landowner/Developer)
- Recognise the potential for BNG delivery and open space in sensitive areas. (Landowner/Developer)

Honi_06 - Former Millwater School at Honiton Bottom Road (approx. 1 response)

Main Issues:

- Support for allocation but request for flexibility to allow a care home (Use Class C2) instead of 30 homes. (Planning consultant on behalf of developer)

Calls For:

- Amend policy wording to:
“This land is allocated for a care home for the elderly (Use Class C2) or 30 homes...”
(Planning consultant)

Honi_07 and Honi_12 – Land adjacent to St Michael’s Church and south east of Cuckoo Down Lane (approx. 4 responses)

Main Issues:

- Statement in policy that Honi_12 is dependent on Honi_07 for access is challenged due to separate ownership and potential for independent access. (Planning consultant on behalf of landowners)
- Concerns about landscape and heritage impact due to proximity to listed buildings and location within a National Landscape. (Town Council, Historic England)
- Legal compliance concerns over consultation process and late inclusion of Honi_12. (Town Council)

Calls For:

- Amend policy to allow for independent access to Honi_12 via Higher Brand Lane. (Planning consultant)
- Restrict Honi_07 to open space only, with built development limited to Honi_12. (Historic England)

- Remove Honi_07 and Honi_12 from the plan due to landscape and heritage concerns. (Town Council)

Honi_10 – Land at Ottery Moor Lane
(approx. 1 response)

Main Issues:

- Support for allocation and confirmation of site deliverability. (Developer)
- Concern that cumulative policy burdens may affect viability. (Developer)

Calls For:

- Retain allocation and ensure policy requirements are proportionate and justified. (Developer)

Honi_13 – Land at Middle Hill, Church Hill
(approx. 5 responses)

Main Issues:

- Site lies within the AONB and has very high landscape value. (Historic England)
- Close proximity to Grade II* listed Church of St Michael and Former Sexton's House; moderate heritage impact predicted. (Historic England, EDDC site assessment)

Calls For:

- Remove Honi_13 from the plan due to cumulative landscape and heritage impacts. (Historic England)

Honi_14 – Land at Northcote Hill
(approx. 1 response)

Main Issues:

- Objection to inclusion due to landscape sensitivity and cumulative impact with GH/ED/39b. (Individual)
- Railway bridge is too narrow and Northcote Road is not suitable for more traffic. (Individual)

Calls For:

- Reinstate the original settlement boundary to exclude Honi_14. (Individual)

Honi_18 – Land at Kings Road
(approx. 10 responses)

Main Issues:

- Objections from residents and Town Council citing traffic, access, landscape, biodiversity, and consultation process concerns. (Individuals, Town Council)
- Concerns about the site's proximity to the A35 and impact on the setting of listed buildings. (Historic England)
- Allegations of procedural unfairness and lack of transparency in site inclusion. (Town Council, Public)

Calls For:

- Remove Honi_18 from the plan. (Town Council, Public)
- Reconsider alternative sites with less impact and better infrastructure. (Individuals)
- Ensure any development includes significant mitigation for access and landscape impact. (Historic England)

GH/ED/39a – Land south of Northcote Hill (north of the railway)
(approx. 5 responses)

Main Issues:

- Presence of 400kV overhead transmission lines (4YA ROUTE TWR 002–112) crossing or adjacent to the site, which pose design and delivery constraints. (Planning consultant on behalf of National Grid Electricity Transmission)
- Lack of policy reference to the need for early engagement with National Grid. (Planning consultant on behalf of National Grid Electricity Transmission)

Calls For:

- Add policy wording:
“The potential impact of the existing overhead transmission line route on design and layout should be taken into account at the pre-application stage through early engagement with National Grid.” (Planning consultant on behalf of National Grid Electricity Transmission)

GH/ED/39b – Land south of Northcote Hill (south of the railway)
(approx. 5 responses)

Main Issues:

- Site capacity is underestimated; technical evidence supports 285–300 homes rather than the 100 currently allocated. (Planning consultant/Developer)
- The site is suitable and available for immediate development. (Developer)
- The site lies near the Blackdown Hills National Landscape and requires sensitive design. (Planning consultant)
- The draft policy fails the NPPF tests of soundness (positively prepared, justified, effective, consistent with national policy). (Planning consultant)
- The draft plan is not legally compliant due to incomplete evidence base and a two-phase Regulation 19 consultation. (Planning consultant)
- Objection to inclusion of the site due to landscape sensitivity and lack of transparency in the site selection process. (Honiton Town Council)

Calls For:

- Revise allocation wording to:
“This site is allocated for 300 homes and will form a medium-scale residential extension on the eastern side of Honiton...” (Planning consultant)
- Increase the housing allocation to 285–300 homes to reflect technical capacity and ensure effective land use. (Planning consultant)
- Remove GH/ED/39b from the Local Plan. (Honiton Town Council)

Employment Land within the Existing Heathpark Industrial Estate
(0 responses)

Main Issues:

- No comments were received from individuals, planning consultants/developers, or public bodies regarding this allocation.

Calls For:

- None.

SD04: Ottery St Mary and its development allocations

Total responses: 22

Otry_01b – Barrack Farm

(approx. 2 responses)

Main Issues:

- Concern that part of the site is an active farm and employment site. (Individual)
- Unclear how the site can accommodate both employment and housing. (Individual)
- Proposed housing density is excessive. (Individual)

Calls for:

- Adjust the developable area to mirror Otry_09 and ensure industrial land is located to the west to avoid conflict with residential areas. (Developer)

Otry_09 – Land at Thorne Farm

(approx. 5 responses)

Main Issues:

- Objection to development due to flood risk and water runoff. (Individual)
- Concerns about visual impact and landscape sensitivity. (Individual)
- Site is partially within a Minerals Consultation Area. (Individual)
- Objection to loss of potential school expansion land. (Individual)
- Objection to development on land owned by Devon County Council due to perceived conflict of interest. (Individual)

Calls for:

- Remove the site from the plan due to flood risk, infrastructure constraints, and landscape impact. (Individual)
- Retain land for future school or leisure expansion. (Individual)
- Support allocation and confirm deliverability, including education land and access solutions. (Public body – Devon County Council)

Otry_10 – Land at Salston Barton

(approx. 6 responses)

Main Issues:

- Objection to inclusion due to flood risk, access, and remoteness from town centre. (Individual)
- Concerns about due process and lack of transparency in site selection. (Individual)
- Objection to development on a private drive. (Town Council)
- Concerns about soakaway and power lines. (Town Council)

Calls for:

- Remove the site from the plan due to process concerns and lack of viability. (Individual)
- Publish results of flood risk assessments. (Town Council)

Otry_15 – Land at Bylands, Slade Road

(approx. 3 responses)

Main Issues:

- Site is too far from town centre to be sustainable. (Individual)
- Lack of footpath infrastructure. (Town Council)

Calls for:

- Improve footpath infrastructure before development. (Town Council)

GH/ED/27 – Land south of Strawberry Lane
(approx. 5 responses)

Main Issues:

- Objection to inclusion due to flood risk, topography, and remoteness. (Individuals, Town Council)
- Concerns about due process and lack of transparency. (Individuals)
- Lack of published flood risk assessment results. (Town Council)
- Need for archaeological assessment. (Public body – Historic England)

Calls for:

- Remove the site from the plan due to process concerns and lack of viability. (Individuals)
- Add requirement for archaeological survey. (Historic England)
- Publish flood risk assessment results. (Town Council)
- Retain allocation and confirm deliverability. (Planning consultant/Developer)

Otry_21 – Gerway Farm
(approx. 4 responses)

Main Issues:

- Objection to development on high-quality agricultural land (Grade 2). (Individual)
- Concerns about traffic and pedestrian safety on Sidmouth Road. (Individuals)
- Site is remote from town centre and facilities. (Town Council, Individuals)
- Density is excessive. (Individuals)

Calls for:

- Remove the site from the plan due to access, sustainability, and agricultural land quality. (Individuals, Town Council)

SD05: Seaton and its development allocations

Total responses: 30

Seat_02 – Land at Barnards Hill Lane
(approx. 6 responses)

Main Issues:

- Objection to development on Green Wedge land, which conflicts with landscape and biodiversity policies. (Individuals)
- Concerns about flooding, drainage, and sewerage infrastructure. (Individuals)
- Impact on bat corridors and protected habitats. (Individuals)
- Visual impact on views from Barnards Hill Lane and the Axe Estuary. (Individuals)
- Access concerns, particularly with Poplar Tree Drive and Barnards Hill Lane junction. (Individuals)
- Site is not needed given existing housing stock and permissions. (Individuals)

Calls for:

- Remove Seat_02 from the Local Plan due to environmental, infrastructure, and landscape concerns. (Individuals)
- Consider alternative access via Lime Way. (Developer)
- Confirm site availability and support allocation. (Planning Consultant on behalf of landowner)

Seat_03 – Land to the south of Harepath Hill (approx. 6 responses)

Main Issues:

- Objection to development on Green Wedge and high-quality agricultural land. (Individuals, Public bodies)
- Impact on Beer Quarry and Caves SAC bat pinch point. (Public body – Natural England)
- Concerns about visual impact, landscape sensitivity, and coalescence with Colyford. (Individuals)
- Inadequate infrastructure and public transport. (Individuals)
- Need for archaeological survey. (Public body – Historic England)

Calls for:

- Remove Seat_03 from the Local Plan. (Individuals, Public bodies)
- Add requirement for archaeological survey. (Historic England)
- Reword contour reference to allow flexibility based on LVIA. (Developer)

Seat_05 – Land off Harepath Road (approx. 8 responses)

Main Issues:

- Objection to development on Green Wedge and high-quality agricultural land. (Individuals, Public bodies)
- Impact on Beer Quarry and Caves SAC bat pinch point. (Public body – Natural England)
- Concerns about flooding, drainage, and impact on Seaton Wetlands. (Individuals)
- Inadequate infrastructure and public transport. (Individuals)
- Concerns about coalescence with Colyford and loss of landscape character. (Individuals)
- Need for coordinated access and delivery with Seat_03. (Public body – Devon County Council)

Calls for:

- Remove Seat_05 from the Local Plan. (Individuals, Public bodies)
- Amend policy to clarify access and allow phased delivery. (Developer)
- Reword policy to allow flexibility in delivery timing and access options. (Developer)

Seat_13a – Land west of Axeview Road (approx. 2 responses)

Main Issues:

- Objection due to proximity to Honeyditches Scheduled Monument and potential archaeological harm. (Public bodies – Historic England, Devon County Council)
- Concerns about landscape impact and setting of heritage assets. (Public body – Historic England)
- Flooding and drainage concerns. (Individuals)

- Impact on bat foraging and commuting routes. (Public body – Natural England)

Calls for:

- Remove Seat_13a from the Local Plan. (Public body – Historic England)
- Require archaeological assessment and mitigation wording for SAC bats. (Public bodies – Historic England, Natural England)

SD06: Sidmouth and its development allocations

Total responses: 21

Sidm_01 – Land south-west of Woolbrook Road

(approx. 1 response)

Main Issues:

- The allocation figure of 127 homes is considered too rigid and may underestimate the site's capacity. (Planning consultant on behalf of Developer)
- The removal of the employment land requirement from the Regulation 18 version has not been reflected in an updated housing capacity. (Planning consultant on behalf of Developer)

Calls for:

- Amend policy wording to:
"This land is allocated for development of **around 160 new homes...**"
to reflect flexibility and updated capacity. (Planning Consultant on behalf of Developer)

Sidm_06a – Land west of Two Bridges Road, Sidford

(approx. 2 responses)

Main Issues:

- Site lies outside the built-up boundary and within the National Landscape (formerly AONB). (Amenity group)
- Risk of flooding from field runoff onto the A375. (Amenity group)
- Site contributes to coalescence between Sidford and Sidbury, contrary to Neighbourhood Plan Policy 3. (Amenity group)

Calls for:

- Remove Sidm_06a from the Local Plan due to landscape, flooding, and coalescence concerns. (Amenity group)

Sidm_31 – Land east of Burscombe Lane / west of Windsor Mead

(approx. 6 responses)

Main Issues:

- Site lies within the National Landscape and is outside the built-up boundary. (Individuals, Amenity group)
- Access concerns:
 - Burscombe Lane is narrow, steep, and prone to subsidence.
 - Windsor Mead junction visibility is substandard and would require land acquisition. (Individuals)
- Drainage and flood risk: field acts as a soakaway; development could increase flood risk. (Individuals)

- Biodiversity: presence of protected species (bats, badgers, owls, dormice); ancient hedgerows. (Individuals)
- Infrastructure: local schools, GP services, and sewerage system are already under pressure. (Individuals)
- Noise and visual impact: concern about heat pump noise and visibility from higher ground. (Individuals)
- Process concerns:
 - Site was previously rejected and added late without consultation.
 - Online consultation process is inaccessible to older residents. (Individuals)

Calls for:

- Remove Sidm_31 from the Local Plan due to access, landscape, biodiversity, and process concerns. (Individuals, Amenity group)

SD07: Development allocations at Broadclyst

Total responses: 20

Brcl_12 – Land west of Whimble Road, Broadclyst

(approx. 6 responses)

Main Issues:

- Concerns about flooding, high water table, and inadequate sewage infrastructure. (Individuals, Parish Council)
- Objection to scale of development as excessive and inconsistent with the Broadclyst Neighbourhood Plan. (Individuals, Parish Council)
- Local roads are narrow and unsafe, especially near schools; increased traffic would worsen safety and congestion. (Individuals, Parish Council)
- Loss of Grade 1 agricultural land and impact on biodiversity, including protected species. (Individuals)
- Visual and heritage impact on nearby listed buildings such as Lake House and Lake Farm. (Historic England, Individuals)

Calls for:

- Remove Brcl_12 from the Local Plan or reduce housing numbers to 70 and limit to southern field. (Individuals, Parish Council)
- Require infrastructure upgrades for drainage, sewage, roads, schools, and healthcare. (Parish Council)
- Amend policy to allow up to 145 homes and consolidate employment land delivery. (Developer)
- Add policy wording to protect heritage assets and support active travel links. (Historic England, National Trust)

Brcl_29 – Land to east of Town End, Broadclyst

(approx. 5 responses)

Main Issues:

- Site's viability depends on coordinated access through Brcl_12. (National Trust, Planning Consultant)

- Proximity to listed buildings and conservation area requires sensitive design. (Historic England)

Calls for:

- Maintain requirement for a joint masterplan with Brcl_12. (National Trust, Planning Consultant)
- Allow flexibility to deliver combined employment land across both sites. (National Trust)
- Strengthen policy to support pedestrian and cycle connectivity. (National Trust)
- Include heritage-sensitive design principles. (Historic England)

SD08: Development allocations at Budleigh Salterton

Total responses: 9

Budl_02 – Land at Barn Lane, Knowle, Budleigh Salterton (approx. 5 responses)

Main Issues:

- Concerns about insufficient infrastructure, including school capacity, GP access, and overloaded sewer systems. (Individuals)
- Objection to development within the East Devon National Landscape due to potential harm to landscape, heritage, and biodiversity. (Individuals)
- Concerns about cumulative development pressure from nearby sites and lack of safe pedestrian access to the primary school. (Individuals)
- Some believe the housing allocation is too low for a town of Budleigh's size and strategic role. (Individual)

Calls for:

- Provide infrastructure upgrades and ensure safe pedestrian links to the primary school before development proceeds. (Individuals)
- Allocate more land for housing to meet local needs and avoid demographic imbalance. (Individual)
- Retain Budl_02 as the preferred site for housing in Budleigh due to its relative suitability and containment. (Developer, Individuals)
- Recognise that the proposal does not constitute "major development" in the National Landscape and is visually and environmentally acceptable. (Developer)

SD09 – Development allocations at Colyton

Total responses: 8

Coly_02 - Land at Hillhead (approx. 1 response)

Main Issues:

- Narrow, single-width access roads raise safety and congestion concerns. (Individuals, Parish Councils)
- Potential adverse impacts on protected bat species and Beer Quarry and Caves SAC. (Individuals, Public body – Environment Agency)
- Lack of employment provision and local job opportunities. (Individuals)

- Inadequate sewage infrastructure and school capacity. (Individuals, Parish Councils)
- Visual impact on the Axe Valley landscape due to elevated location. (Individuals)

Calls for:

- Reconsider or remove the allocation due to access, infrastructure, and ecological concerns. (Individuals, Parish Councils)
- Consider alternative sites closer to the town centre with better infrastructure. (Individuals)

Land adjacent to the Peace Memorial Playing Fields (Coly_06a)

Main Issues:

- Part of the site lies in a floodplain; concerns about flood risk and development suitability. (Individuals, Public body – Environment Agency)
- Site has long been earmarked for a new primary school; development would prevent this. (Individuals, Parish Councils)
- Lack of employment provision. (Individuals)

Calls for:

- Remove the site from the Local Plan and safeguard it for a new school. (Individuals, Parish Councils)

SD10 – Development allocations at Lypstone

Total responses: 20

**Lymp_01 – Little Paddocks, 22 Underhill Crescent
(approx. 3 responses)**

Main Issues:

- No significant objections noted; some support for small-scale development. (Individuals)

Calls for:

- Retain allocation; ensure appropriate landscaping and design. (Individuals)

GH/ED/72a – Land at Meeting Lane

Main Issues:

(approx. 9 responses)

- Located in the Coastal Preservation Area; landscape and heritage sensitivity. (Individuals, Historic England)
- Concerns about water quality, flood risk, and biodiversity loss. (Individuals, Environmental groups)
- Infrastructure concerns: roads, school, GP, and sewage capacity. (Individuals, Parish Council)

Calls for:

- Remove or reduce the allocation. (Individuals, Developer)
- Include the entire western field. (Developer)
- Strengthen policy wording to protect heritage and biodiversity. (Historic England)

**GH/ED/73 – Land north west of Strawberry Hill
(approx. 8 responses)**

Main Issues:

- Proximity to heritage assets and sensitive habitats. (Historic England, Individuals)
- Concerns about access, traffic, and infrastructure. (Individuals)

Calls for:

- Retain allocation due to planning progress and deliverability. (Developer)
- Add policy wording to protect heritage settings and provide landscape buffers. (Historic England)

SD11 – Development allocations at Woodbury

Total responses: 11

Wood_06 – Land to rear of Orchard House, Globe Hill (approx. 2 responses)

Main Issues:

- No major objections; site seen as well-located and deliverable. (Developer)

Calls for:

- Retain allocation; consider adjacent land for future growth. (Developer)

Wood_09 – Land off Globe Hill (approx. 2 responses)

Main Issues:

- Potential harm to the setting of Grade I listed St Swithun's Church and Grade II Oakhayes House. (Historic England)
- Flood risk and need for green infrastructure. (Public body – Environment Agency)

Calls for:

- Strengthen policy wording to protect heritage assets and landscape character. (Historic England)

Wood_10 – Land at Gilbrook (approx. 2 responses)

Main Issues:

- Heritage concerns regarding Gilbrook House and Higher Venmore. (Historic England)
- Infrastructure and access concerns. (Individuals)

Calls for:

- Retain allocation due to planning progress and deliverability. (Developer)
- Add policy wording to conserve heritage settings. (Historic England)

Wood_16 – Land south of Broadway (approx. 2 responses)

Main Issues:

- Concerns about pedestrian safety and traffic on B3179. (Individuals)
- Adjacent to Conservation Area; heritage sensitivity. (Historic England)

Calls for:

- Retain allocation; ensure heritage-sensitive design. (Individuals, Historic England)

Wood_20 – Land east of Town Lane

(approx. 1 response)

Main Issues:

- Access concerns due to narrow roads. (Individual)
- Impact on countryside. (Individual)

Calls for:

- Prioritise sites with better access. (Individual)

SD12: Development allocation at Broadhembury

Total responses: 2

Brhe_09 – Land opposite the Village Hall

(2 responses)

Main Issues:

- Development constitutes “major development” and is inappropriate in the setting of the Blackdown Hills National Landscape. (Parish Council, Blackdown Hills National Landscape)
- Harm to the character and appearance of the Broadhembury Conservation Area, including impact on views, village form, and listed buildings. (Parish Council)
- Inconsistencies and lack of justification in the redrawing of the Built-Up Area Boundary to include the site. (Parish Council)
- Conflict with local and national policies including OL02 (National Landscapes), OL04 (Strategic Visual Importance), HE03 (Conservation Areas), and the EDDC Heritage Strategy. (Parish Council)

Calls for:

- Remove the allocation of Brhe_09 from the plan due to scale, heritage, and landscape impacts. (Parish Council)
- Consider alternative sites within the village that would result in less harm. (Parish Council)

SD13: Development allocation at Chardstock

Total responses: 4

Char_04a – Land off Green Lane

(4 responses)

Main Issues:

- Growth inappropriate for this small village, given infrastructure constraints. (Individuals)
- Support for allocation. (Developer)

Calls for:

- Modify the allocation to include additional land to the north for lower density development and enhanced landscaping. (Developer)
- Strengthen policy wording to require pedestrian links. (Devon County Council)
- Any development to be redirected to brownfield sites in the village (Individuals)

SD14: Development (Neighbourhood Plan led) at Clyst St Mary

Total responses: 6

**Neighbourhood Plan-led allocation (72 dwellings)
(6 responses)**

Main Issues:

- Uncertainty over deliverability of the Neighbourhood Plan allocation. (Individuals, Planning Consultants)
- Lack of evidence supporting the proposed site in the Neighbourhood Plan. (Individuals)
- Highway safety concerns regarding the proposed link road. (Devon County Council)

Calls for:

- Replace SD14 with a direct allocation in the Local Plan for at least 72 dwellings. (Planning Consultants)
- Allocate alternative site (Sowt_09) based on deliverability and evidence. (Planning Consultants)
- Include access considerations and discourage through traffic. (Devon County Council)

SD15: Development allocation at Dunkeswell

Total responses: 2

**Dunk_05 – Broomfields
(2 responses)**

Main Issues:

- Need for safe pedestrian access and protection of ancient trees. (Devon County Council)
- Support for allocation but request for flexibility in dwelling numbers. (Developer)

Calls for:

- Add policy wording to support sustainable travel improvements. (Devon County Council)
- Amend policy wording to “around 43 dwellings” for flexibility. (Developer)

SD16: Development allocation at East Budleigh

Total responses: 6

**Ebud_01 – Land off Frogmore Road
(6 responses)**

Main Issues:

- Proximity to East Devon National Landscape and Syon House (non-designated heritage asset). (Historic England, Individuals)
- Concerns about access via narrow roads and impact on scenic quality. (Individuals)

Calls for:

- Limit development to affordable or small starter homes. (Individuals)
- Provide safe pedestrian crossing over B3178 and underground overhead wires. (Devon County Council, Individuals)

SD17: Development allocations at Exton

Total responses: 12

**Wood_01 – Land west of Oaklands
(approx. 3 responses)**

Main Issues:

- Support for allocation due to sustainability and transport links. (Planning Consultants)
- Need for coordinated masterplanning with adjacent site. (Devon County Council)

Calls for:

- Retain allocation and ensure pedestrian/cycle links to Wood_28. (Planning Consultants)
- Include requirement for a joint masterplan. (Devon County Council)

Wood_28 – Land north and east of Exton Farm

(approx. 8 responses)

Main Issues:

- Flood risk and unclear policy wording. (Environment Agency)
- Impact on setting of Grade II* listed Exton Farmhouse. (Historic England)
- Proximity to MOD safeguarding zone. (Ministry of Defence)

Calls for:

- Clarify flood mitigation expectations. (Environment Agency)
- Restrict development to southern part of site and retain northern area as open space. (Historic England)
- Ensure development does not impact MOD operations. (Ministry of Defence)

SD18: Development allocations at Feniton

Total responses: 54

Feni_05 – Land at Burlands Mead

(approx. 7 responses)

Main Issues:

- Sewerage capacity and potential relocation of train station. (Network Rail, Individuals)
- Flooding and infrastructure concerns. (Individuals)

Calls for:

- Ensure sewerage upgrades before development. (Individuals)
- Consider safeguarding site for future station relocation. (Network Rail)

Feni_08 – Land adjacent to Beechwood

(approx. 37 responses)

Main Issues:

- Support for allocation with detailed site plan and technical evidence. (Developer)
- Strong opposition citing flooding, sewage, traffic, and sustainability. (Individuals, Parish Council)

Calls for:

- Retain allocation with ecological enhancements and public open space. (Developer)
- Remove or reduce allocation due to infrastructure and sustainability concerns. (Individuals, Parish Council)

Otry_20 – Land to the south east of Bridge Cottages (Employment)

(approx. 30 responses)

Main Issues:

- Unsafe access via Green Lane and disproportionate scale. (Individuals)
- Impact on rural setting and nearby listed buildings. (Historic England)

Calls for:

- Remove site from plan or reduce scale. (Individuals)
- Include policy wording to mitigate heritage impacts. (Historic England)

SD19: Development allocation at Hawkchurch

Total responses: 8

Hawk_01 – Norton Store (8 responses)

Main Issues:

- Concerns about limited site area and viability of mixed-use scheme. (Developer)
- Need for flexibility in employment provision and housing numbers. (Developer)

Calls for:

- Expand site boundary to include additional land. (Developer)
- Amend policy to allow around 29 dwellings and small-scale employment. (Developer)

SD20: Development allocations at Kilmington

Total responses: 5

Kilm_09b – Land east of George Lane (approx. 2 responses)

Main Issues:

- Support for allocation with comprehensive layout including Kilm_09a. (Developer)
- Concerns about reliance on Neighbourhood Plan site and policy clarity. (Developer)

Calls for:

- Amend policy to include both Kilm_09a and Kilm_09b under SD20. (Developer)
- Clarify design principles and affordable housing expectations. (Developer)

Kilm_10 – Land west and south west of the Old Inn (approx. 3 responses)

Main Issues:

- Impact on setting of Grade II listed Old Inn. (Historic England)
- Risk of losing pub car park. (Historic England)

Calls for:

- Exclude pub car park from site boundary or retain parking provision. (Historic England)
- Enhance boundary planting and visual buffer. (Historic England)

SD21: Development Allocation at Musbury

Total responses: 3

Musb_01a – Land at Baxter's Farm (3 responses)

Main Issues:

- Heritage sensitivity due to conservation area and listed buildings. (Historic England)
- Site lies within the Beer Quarry and Caves SAC connectivity zone. (Natural England)

Calls for:

- Require high-quality scheme with conversions and new builds that conserve heritage. (Historic England)
- Include mitigation measures for bat activity and SAC integrity. (Natural England)

SD22: Development allocations at Newton Poppleford

Total responses: 3

Newt_04 – Land to the West of Badger Close

(approx. 1 response)

Main Issues:

- Site lies within East Devon National Landscape and requires sensitive design. (Individuals)
- Elevated eastern parts are especially sensitive. (Individuals)
- Need for footpath connectivity to Newt_05 and King Alfred Way. (Devon County Council)

Calls for:

- Ensure footpath is surfaced and usable in all weather before occupation. (Devon County Council)
- Require masterplan approach for both Newt_04 and Newt_05. (Devon County Council)

Newt_05 – Land to the East of Exmouth Road

(approx. 2 responses)

Main Issues:

- Similar landscape sensitivity as Newt_04. (Individuals)
- Footpath connection to King Alfred Way is essential. (Devon County Council)

Calls for:

- Require footpath to be completed and usable before any occupation. (Devon County Council)
- Ensure design respects landscape setting. (Individuals)

SD23: Development allocation at Otterton

Total responses: 8

Otto_01 – Land north of Behind Hayes

(8 responses)

Main Issues:

- Heritage and landscape constraints, including proximity to listed buildings and conservation area. (Historic England, Individuals)
- Ancient orchard and rural character. (Individuals)

Calls for:

- Require careful design, building height limits, and green space retention. (Historic England, Individuals)
- Clarify which parts of the site are suitable for development. (Individuals)

SD24: Development allocation at Payhembury

Total responses: 1

Payh_03a – Land adjacent to Markers Park

(1 response)

Main Issues:

General support for allocation with minor boundary concerns. (Developer)

Calls for:

- Amend allocation boundary to align with indicative layout plan. (Developer)

SD25: Development allocation at Plymtree

Total responses: 3

Plym_03 – Land north of School

(3 responses)

Main Issues:

- Heritage sensitivity due to proximity to Grade I listed Church of St John the Baptist. (Historic England)
- General support for allocation and planning application in progress. (Developer)

Calls for:

- Reduce site capacity or specify “up to 30 homes” with design controls. (Historic England)
- Retain allocation and proceed with development. (Developer)
- Highway safety concerns, access non-compliant with NPPF. (individual)

SD26: Development allocation at Sidbury

Total responses: 7

Sidm_34 – Land south of Furzehill

(7 responses)

Main Issues:

- Impact on National Landscape, Sidbury Castle Scheduled Monument and grade II listed Furzehill Farmhouse. (Historic England, Individuals)
- Flood risk, road safety, and lack of infrastructure. (Individuals)
- Legal compliance with National Landscapes. (Individuals)

Calls for:

- Add policy text to conserve heritage assets and limit development on upper slopes. (Historic England)
- Remove site from plan due to legal and environmental concerns. (Individuals)

SD27: Development allocation at Tipton St John

Total responses: 1

Otry_04 – Land South of Otter Close

(1 response)

Main Issues:

- Dependency on new school construction. (Devon County Council)
- Site not viable for housing without school. (Devon County Council)

Calls for:

- Clarify policy that housing is contingent on school completion. (Devon County Council)

- Ensure site is not developed if school is not delivered. (Devon County Council)

SD28: Development allocations at West Hill

Total responses: 2

West_04 – Land adjoining Windmill Lane

(1 response)

Main Issues:

- Support as in a sustainable location. (Individual)
- Support as helps satisfy the urgent need for new housing in the area. (Individual)

Calls for:

- None

West_18 – Land north and east of Eastfield

(1 response)

Main Issues:

- Support as in a sustainable location. (Individual)
- Support as helps satisfy the urgent need for new housing in the area. (Individual)

Calls for:

- None

Strategic Policy: SD29: Development allocations at Whimble

Total responses: 90

Whim_08a – Land West of Bramley Gardens

(approx. 50 responses)

Main Issues:

- Located in Green Wedge, risking coalescence with Cranbrook. (Individuals, Parish Council)
- Lack of safe pedestrian access. (Individuals, Parish Council)
- Flood risk and wildlife habitat concerns. (Individuals, Parish Council)
- Procedural issues in allocation process. (Individuals, Parish Council)

Calls for:

- Remove site from plan. (Individuals, Parish Council)
- Reassess site with updated evidence. (Individuals, Parish Council)
- Preserve rural character and biodiversity. (Individuals, Parish Council)

Whim_11 – Land at Station Road (Old Cricket Ground)

(approx. 50 responses)

Main Issues:

- Flood risk and downstream impact. (Individuals, Parish Council)
Contains protected trees and is designated Land of Local Importance. (Individuals, Parish Council)
- Traffic and pedestrian safety concerns. (Individuals, Parish Council)

Calls for:

- Remove site from plan. (Individuals, Parish Council)
- Limit development to reflect local housing need. (Individuals, Parish Council)
- Protect heritage and environmental features. (Individuals, Parish Council)

6. Mitigating Climate Change

Total responses: 105

CC01 – Climate Emergency

Total responses: 19

Main Issues:

- General support for the ambition to reach carbon neutrality by 2040, but concern that the policy lacks clarity on how this will be enforced or measured. (Individuals, Parish Councils)
- Developers questioned the viability of requiring all developments to support net-zero without flexibility for site-specific constraints. (Multiple planning consultants)
- Concern that the policy seeks to go beyond national policy and adds to the complexity of regulations (Planning Consultants/Developers, Home Builders Federation)

Calls for:

- Provide clearer guidance on what constitutes “supporting movement to net-zero” in practical terms. (Individuals, Parish Councils)
- Include measurable targets or indicators to track progress. (Environment Agency)
- Clarify how carbon savings will be assessed and enforced at application stage. (Multiple planning consultants)

CC02 – Net-Zero Carbon Development

Total responses: 33

Main Issues:

- Strong developer opposition to mandating Future Homes Standard (FHS) 2025 if not yet adopted in Building Regulations. (Multiple planning consultants)
- Concerns about the cost and feasibility of retrofitting for solar panels and heat pumps. (Multiple planning consultants)
- BREEAM “Excellent” standard for non-residential development seen as too rigid and potentially unviable. (Multiple planning consultants)
- Individuals supported the ambition but questioned whether enforcement mechanisms are in place.

Calls for:

- Delay implementation of FHS 2025 requirements until they are formally adopted. (Multiple planning consultants)
- Allow flexibility for BREEAM standards where viability is an issue. (Multiple planning consultants)
- Include clearer expectations for compliance certificates and monitoring. (Environment Agency)
- Consider exemptions or phased implementation for small developers. (Individuals)
- Need to recognise the different approaches required for buildings of traditional construction and heritage assets (Historic England)

CC03 – Promoting Low Carbon and Renewable Energy

Total responses: 6

Main Issues:

- General support for renewable energy, but concerns about visual and landscape impacts, especially in National Landscapes, Heritage and coastal areas. (Individuals, Historic England)
- Concerns raised over the 'Areas Considered Suitable for Wind Energy' and the effects of turbines at these locations on Heritage, Landscape, ecological and environmental grounds including the impact on aquifers (Environment Agency, Historic England, RSPB)

Calls for:

- Clarify what constitutes “exceptional circumstances” for development in protected landscapes. (Historic England)
- Provide clearer criteria for assessing cumulative impacts of renewable schemes. (Environment Agency)
- Support for small-scale wind and solar installations welcomed. (Individuals)

CC04 – Energy Storage

Total responses: 2

Main Issues:

- Support for the principle of energy storage and advice on fire safety but concerns raised about siting and the impact on the environment and water pollution. (Environment Agency)

Calls for:

- Ensure that paragraph 1 (Permission will be granted) is caveated by paragraph 2 to ensure adverse impacts are limited, and strengthen supporting information to contain water resulting from fire control (Environment Agency)
- Include reference to enhancing the natural environment (Public body – Devon Wildlife Trust)

CC05 – Heat Networks

Total responses: 15

Main Issues:

- Developers raised concerns about the feasibility and cost of connecting to heat networks, especially in low-density areas. (Multiple planning consultants/Developers)
- Lack of clarity on what constitutes “feasible” infrastructure for future connection. (Multiple planning consultants/Developers)

Calls for:

- Define thresholds and criteria for feasibility assessments. (Environment Agency)
- Consider incentives or funding support for heat network infrastructure. (Individuals)
- Strengthen the wording of the policy (to ‘will’ or ‘should’) to require a connection to heat networks for developments within 1km of existing networks (Environment Agency)

CC06 – Embodied Carbon

Total responses: 23

Main Issues:

- General support for reducing embodied carbon, but developers raised concerns about the cost and complexity of Whole Life Cycle Carbon Assessments and which assessments will be required. (Multiple planning consultants)
- Questions about how refurbishment viability will be assessed. (Multiple planning consultants)
- Lack of requirement for Whole Life Cycle of Carbon Emissions to be net zero appears to be a step backwards (Environment Agency)

Calls for:

- Provide a clear methodology or template for carbon assessments. (Environment Agency)
- Clarify when demolition is acceptable and how viability will be judged. (Multiple planning consultants)
- Supporting text to require heritage policies in the local plan and NPPF to be met when dealing with a heritage asset (Historic England)

7. Adapting to Climate Change

Total responses: 94

AR01: Flooding

Total responses: 31

Main Issues:

- Numerous respondents argue that the policy is not aligned with the updated NPPF (December 2024), particularly regarding the application of the sequential and exception tests. (Planning consultants, developers)
- The requirement to assess land within 5 metres of Flood Zone 2 is seen as excessive and inconsistent with national policy. (Planning consultants, developers)
- The policy's expectation that SuDS reduce runoff to below greenfield rates is widely challenged as unjustified and inconsistent with Devon County Council guidance. (Planning consultants, developers)
- Several representations argue that the policy lacks flexibility and fails to acknowledge the drainage hierarchy or feasibility constraints. (Planning consultants, developers)
- The opposition to culverting in all circumstances is considered overly rigid and impractical for minor watercourses. (Planning consultants, developers, Devon County Council)
- The requirement for developments to deliver wider community flood risk benefits (e.g. oversized SuDS or partnership funding) is seen as unviable and not properly tested. (Planning consultants, developers)
- Calls were made for clearer links between this policy and Biodiversity Net Gain (BNG) delivery. (Home Builders Federation)

- The Environment Agency supports the policy's ambition but recommends stronger and clearer wording in several areas, including SuDS, culverting, and cumulative flood risk. (Environment Agency)
- Parish councils and individuals raised concerns about the impact of development on existing flood-prone areas and the adequacy of infrastructure. (Parish councils, individuals)

Calls for:

- Update the policy to reflect the revised NPPF and Planning Practice Guidance, particularly regarding the sequential test. (Planning consultants, developers)
- Remove or revise the 5-metre buffer requirement around Flood Zone 2. (Planning consultants, developers)
- Amend SuDS requirements to align with Devon guidance: runoff should not exceed greenfield rates, but not necessarily be lower. (Planning consultants, developers, Devon County Council)
- Introduce flexibility by referencing the drainage hierarchy and feasibility of SuDS. (Planning consultants, developers)
- Modify culverting policy to allow exceptions where necessary for access. (Planning consultants, developers, Devon County Council)
- Remove or revise requirements for oversized SuDS and partnership funding unless viability tested. (Planning consultants, developers)
- Strengthen links to BNG and clarify how flood management measures can support biodiversity. (Home Builders Federation)
- Strengthen language around cumulative flood risk and clarify expectations for all development sites. (Environment Agency)
- Ensure the policy is informed by the most up-to-date SFRA and flood risk mapping. (Public body – Environment Agency, Devon County Council)

AR02: Water Efficiency

Total responses: 16

Main Issues:

- Widespread objection to the requirement for 110 litres per person per day, citing lack of published evidence (e.g. Water Cycle Study) and inconsistency with Building Regulations. (Planning consultants, developers)
- Many argue that East Devon is not classified as a water-stressed area, so the stricter standard is not justified. (Planning consultants, developers)
- Concerns raised about the policy's impact on viability and deliverability, especially for larger dwellings. (Planning consultants, developers)
- Several representations argue that water efficiency is already covered by Building Regulations and does not require a separate policy. (Planning consultants, developers)
- General support of the policy but raising the need to address water resource supporting evidence. (Environment Agency, South West Water)
- Calls were made to extend the policy to cover agricultural and commercial buildings, given their significant water use. (Environment Agency)

Calls for:

- Publish the Water Cycle Study and ensure it provides robust justification for the 110 litres standard. (Planning consultants, developers)
- Amend the policy to reflect the national standard of 125 litres unless clear evidence supports a stricter requirement. (Planning consultants, developers)
- Acknowledge that developers cannot enforce water usage behaviour, only install efficient fittings. (Planning consultants, developers)
- Extend the policy to include water efficiency in agriculture and commercial buildings. (Environment Agency)
- Include reference to the EA/SWW joint paper on water resources as supporting evidence. (Environment Agency)

AR03: Coastal Change Management Areas (CCMAs)

Total responses: 28

Main Issues:

- Strong opposition from residents and landowners in Sidmouth, particularly Cliff Road, who argue that the CCMA is based on flawed or inconsistent erosion data. (Individuals, local groups)
- Many claim the policy infringes on property rights and could lead to blight, reduced property values, and difficulty selling homes. (Individuals, local groups)
- Concerns that the policy does not account for the forthcoming Beach Management Scheme, which is expected to reduce erosion risk. (Individuals, local groups)
- The Environment Agency supports a precautionary approach using the most landward extent of available evidence. (Environment Agency)
- Calls for the policy to better reflect the need for environmental enhancement. (Devon Wildlife Trust)

Calls for:

- Reassess the CCMA boundaries using the most robust and locally specific data, including the Beach Management Plan. (Individuals, local groups)
- Include a commitment to review the CCMA following implementation of the Beach Management Scheme. (Individuals, local groups)
- Allow householders to extend or modify existing properties within the CCMA, subject to risk assessment. (Individuals, local groups)
- Clarify the evidence base and methodology used to define erosion rates. (Individuals, local groups)
- Include reference to environmental enhancement and biodiversity. (Devon Wildlife Trust)

AR04: Relocation of Uses Affected by Coastal Change

Total responses: 1

Main Issues:

- The policy is broadly supported. (Environment Agency)

Calls for:

- Consider allocating land for relocated uses to provide greater certainty. (Environment Agency)

AR05: Development Affecting Coastal Erosion

Total responses: 6

Main Issues:

- The Environment Agency and others find the policy wording unclear and recommend revisions to better reflect the planning balance. (Environment Agency)
- Historic England and the Jurassic Coast WHS team request stronger links to Policy PB10 and UNESCO notification procedures. (Historic England, Jurassic Coast WHS)
- Devon Wildlife Trust calls for explicit reference to environmental enhancement. (Devon Wildlife Trust)
- Some respondents want the policy to explicitly safeguard land needed for rollback and biodiversity. (Environmental groups)

Calls for:

- Clarify the policy's intent and ensure it reflects the need to balance visual and environmental impacts. (Environment Agency)
- Add references to Policy PB10 and UNESCO procedures for World Heritage Sites. (Historic England, Jurassic Coast World Heritage Site)
- Include a requirement for enhancement of the natural environment. (Devon Wildlife Trust)
- Avoid development on land needed for future rollback or biodiversity adaptation. (Environmental groups)

8. Meeting Housing Needs

Total responses: 192

HN01 – Housing to Address Needs

Total responses: 25

Main Issues:

- Policy is not clear and will not be effective, as the way in which the mix for developments will be prescribed, assessed or controlled is not clear. (Multiple Planning Consultants/Developers)
- Policy only focuses on tenure and percentages for affordable homes, despite demographic trends showing growth in the 65+ age group. (Individual)
- Concern around approach to SCB housing and the blanket approach in HN05, as mix should be based on a clear need (Multiple Planning Consultants/Developers)

Calls for:

- Policy should include housing allocations that deliver 100% of East Devon's housing needs, not just 80%. (Planning Consultants)
- Local market evidence and sales information should be used to determine appropriate housing need. (Planning Consultants)

- Need to require improvement of the natural environment and building to net-zero (Devon Wildlife Trust)

HN02 – Affordable Housing

Total responses: 55

Main Issues:

- Requirement for 30% affordable housing on sites over 250 dwellings may create viability and delivery constraints. (Developers)
- Policy requires affordable housing to be indistinguishable from market housing and integrated within developments. (Planning Consultants)
- Policy allows developers to submit viability assessments if full affordable housing requirement cannot be met. (Planning Consultants)
- Questioned the differing percentage requirements for affordable housing across the district (Developers, Individuals)

Calls for:

- Remove the requirement for affordable housing on self-build plots. (Developers)
- Provide flexibility in tenure mix and allow market evidence to justify alternative mixes. (Planning Consultants)
- Strengthen the requirement for affordable and social housing, lower the threshold and raise the requirements to ensure enough affordable homes are delivered (Parish Councils, Individuals)

HN03 – Housing for Older People

Total responses: 25

Main Issues:

- Policy is too restrictive since it limits housing for older people to within 400 metres walking distance of local facilities and shops. (Individual)
- Policy is ageist and assumes older people do not use cars or internet. (Individual)
- Policy is unnecessary and overly onerous and should be deleted. (Planning Consultants)

Calls for:

- Policy should be amended to allow for greater flexibility in location and design with the removal of the blanket requirement. (Planning Consultants)
- Clarify whether the 10% requirement is in addition to affordable housing. (Planning Consultants)
- Requirement for the provision of areas where older people can access the natural environment (Public body – Devon Wildlife Trust)

HN04 – Accessible and Adaptable Housing

Total responses: 22

Main Issues:

- Mandated standards raise serious concerns about site yield, viability, and site suitability. (Planning Consultants/Developers)
- M4(2) standards may not be achievable on many sites due to topography and parking space requirements. (Planning Consultants/Developers)
- Requirement for lifts in flat blocks increases maintenance costs. (Planning Consultants/Developers)
- Potential for house price increases due to size requirements pricing more people out (Individuals)

Calls for:

- Reduce the percentage requirement for M4(2) dwellings. (Planning Consultants/Developers) Exclude flats, 1-bed units, and self/custom build plots from the requirement. (Planning Consultants/Developers)
- Provide evidence for M4(3) requirements and allow flexibility based on need. (Planning Consultants/Developers)

HN05 – Self-Build and Custom Build Housing

Total responses: 42

Main Issues:

- Marketing period of 24 months is too long and may delay housing delivery. (Developers)
- Requirement for completion within 3 years is unreasonable and not justified. (Developers)
- Blanket 5% requirement is not supported by evidence of demand. (Planning Consultants)
- It is noted that this policy adds to the complexity of delivering housing developments and may cause delays (Planning Consultants/Developers)

Calls for:

- Reduce marketing period to 12 months. (Developers)
- Remove 3-year build-out requirement. (Planning Consultants)
- Allocate specific sites for self-build housing based on local demand. (Planning Consultants)
- Potential for exemption for 100% affordable and older persons schemes and further guidance for affordable self-build housing (Developers, Parish Council)

HN06 – Sub-dividing or Replacing Existing Buildings and Dwellings

Total responses: 1

Main Issues:

- Policy is restricted to settlements and should apply across the district, with supporting information for when a replacement dwelling is justified (Individual)

Calls for:

- Omit 'Outside settlement boundaries' from the heading for clarity (Individual)

HN07 – Householder Annexes, Extensions, Alterations or Outbuildings Outside Settlement Boundaries

Total responses: 1

Main Issues:

- Requirements to respond positively to the ‘context and character’ of the area should be part of the policy, not the supporting text (Historic England)

Calls for:

- Adjust the policy to refer to ‘context and character’ of the area, and cross reference to heritage policies (Historic England)

HN08 – Hostels and Houses in Multiple Occupation (HMOs)

Total responses: 2

Main Issues:

- Cycling is an attractive option if the site is within 800m of the town centre and there is a conflict between this policy and TR04 requiring 1 secure cycle parking space per bedroom and the NPPF. (Group – Sidmouth Cycling Campaign)

Calls for:

- Alteration to clause B and the deletion of references to cycle storage facilities (Group – Sidmouth Cycling Campaign)

HN09 – Gypsy and Traveller Sites

Total responses: 2

Main Issues:

- Objection to Langaton Lane site allocation due to failure to meet policy criteria. (Planning Consultants)
- 15-minute access requirement is too prescriptive. (Individuals)

Calls for:

- Delete Langaton Lane site allocation. (Planning Consultants)
- Amend criterion A to remove the 15-minute travel time requirement. (Individuals)

HN10 – Rural Housing Exception Sites

Total responses: 7

Main Issues:

- Requirement for 66% affordable housing may be too high without subsidies. (Individuals)
- Need should be based on the local data from Neighbourhood Plans, Parish suveys or parish plans (Individual)

Calls for:

- Introduce flexibility in affordable housing percentage where viability is an issue. (Individuals)
- Uplyme has the potential to be considered for exception sites to meet the needs of Lyme Regis (Dorset Council)

HN11 – Housing for Rural Workers

Total responses: 2

Main Issues:

- Objection to 150sqm size cap for rural workers' dwellings. (Planning Consultants)

Calls for:

- Allow larger dwellings where justified by business needs. (Planning Consultants)

9. Supporting the Economy and Town Centres

Total responses: 40

SE01 – Employment development within settlement boundaries

Total responses: 4

Main Issues:

- Policy wording is too restrictive and excludes other employment-generating uses like retail, which can offer higher job density and economic value. (Planning Consultants, Retail Sector)
- Over-reliance on Use Class Order limits flexibility to support economic growth. (Retail Sector)
- Policy lacks reference to the natural environment and post-COVID economic trends. (Devon Wildlife Trust, Devon County Council)

Calls for:

- Amend policy to focus on economic benefits rather than Use Class Order. (Retail Sector)
- Include reference to integrating natural environment into employment areas. (Devon Wildlife Trust)
- Update evidence (ECN-007) to reflect post-COVID changes in employment demand. (Devon County Council)

SE02 – Employment development in the countryside

Total responses: 9

Main Issues:

- Restricting development to within existing operational boundaries is overly rigid and stifles rural business growth. (Planning Consultants, Landowners)
- Policy does not reflect national guidance on flexibility for economic growth. (Planning Consultants)
- No reference to environmental enhancement. (Devon Wildlife Trust)

Calls for:

- Allow expansion “adjacent to” existing sites where justified. (Planning Consultants)
- Include flexibility to accommodate unanticipated business needs. (Planning Consultants)
- Add reference to protection and enhancement of the natural environment. (Devon Wildlife Trust)

SE03 – Farm diversification

Total responses: 3

Main Issues:

- Policy is too restrictive and may hinder long-term farm viability. (Planning Consultants)
- Lack of clarity on viability criteria and environmental expectations. (Planning Consultants, Devon Wildlife Trust)

Calls for:

- Clarify what constitutes a viable diversification scheme. (Planning Consultants)
- Include reference to environmental protection and enhancement. (Devon Wildlife Trust)

SE04 – Resisting the loss of employment sites

Total responses: 2

Main Issues:

- Policy is broadly supported but lacks clarity on how it applies to proposed employment allocations. (Planning Consultants)
- Viability and marketing requirements may be too rigid. (Developers)

Calls for:

- Clarify application to both existing and proposed employment sites. (Planning Consultants)
- Allow flexibility in land use where justified by evidence. (Developers)

SE05 – Employment and Skills Statements

Total responses: 5

Main Issues:

- Requirement for Employment and Skills Statements may duplicate existing planning documents. (Developers)
- Unclear what guidance is being referred to in the policy. (Developers, Planning Consultants)

Calls for:

- Clarify or publish referenced guidance. (Developers)
- Allow flexibility in how employment commitments are secured. (Developers)

SE06 – Town centre hierarchy

Total responses: 2

Main Issues:

- Sequential test evidence is outdated and does not reflect current vacancy rates. (Devon County Council)
- Policy does not sufficiently distinguish between Lyme Regis and Uplyme. (Neighbouring Authority)

Calls for:

- Update sequential test and retail vacancy data. (Devon County Council)
- Clarify retail impact assessment boundaries near Lyme Regis. (Neighbouring Authority)

SE07 – Town centre development, sequential approach and impact assessment

Total responses: 3

Main Issues:

- Support for protecting historic shopfronts and enhancing townscape. (Historic England)
- “Enhance the natural environment wherever possible” is seen as too weak. (Devon Wildlife Trust)

Calls for:

- Strengthen language on environmental enhancement. (Devon Wildlife Trust)
-

SE08 – Local shops and services

Total responses: 0

Main Issues:

- No specific issues raised in the document.

Calls for:

- No specific calls for change identified.
-

SE09 – Rural shops outside of towns and villages

Total responses: 1

Main Issues:

- Policy lacks clarity on how to assess retail impact and sustainability. (Planning Consultant)

Calls for:

- Clarify criteria for assessing impact on local centres. (Planning Consultant)
-

SE10 – Sustainable tourism

Total responses: 6

Main Issues:

- Policy lacks reference to flood risk and wastewater management. (Environment Agency)
- Unclear how tourism and nature-based priorities are balanced. (Public, Devon Wildlife Trust)

Calls for:

- Add flood risk and wastewater criteria. (Environment Agency)
 - Include stronger support for nature-based tourism. (Devon Wildlife Trust)
-

SE11 – Holiday accommodation parks in designated landscapes

Total responses: 4

Main Issues:

- Policy may be open to misinterpretation and loopholes. (Individuals)

- Insufficient protection for sensitive landscapes and community amenity. (Individuals, Devon Wildlife Trust)

Calls for:

- Add specific restrictions on pitch conversions, seasonal use, and green space loss. (Individuals)
- Strengthen environmental protection and biodiversity net gain expectations. (Devon Wildlife Trust)

10. High Quality Design

Total responses: 71

DS01 – Design and local distinctiveness

Total responses: 26

Main Issues:

- Policy is overly prescriptive and duplicates national guidance and other local plan policies. (Planning Consultants)
- Reference to “any other local design guidance” is too vague. (Planning Consultants)
- Requirement to meet both national and local space standards is unclear and unjustified. (Developers, Planning Consultants)
- Concerns about enforceability of waste management expectations for future occupants. (Developers)
- Policy does not sufficiently address biodiversity, light pollution, or historic building constraints. (Environment Agency, Historic England, Devon Wildlife Trust)
- Concerns about poor design quality in past developments and lack of enforcement. (Individuals)

Calls for:

- Clarify or remove reference to unspecified local space standards. (Developers)
- Amend waste hierarchy language to “promote” rather than “secure” management. (Developers)
- Include reference to biodiversity protection and the mitigation hierarchy. (Devon Wildlife Trust)
- Add guidance on lighting impacts on wildlife and dark skies. (Devon Wildlife Trust, Blackdown Hills National Landscape)
- Clarify that fabric-first approach may not apply to historic buildings. (Historic England)
- Strengthen enforcement and design expectations for all housing types, including affordable housing. (Individuals)

DS02 – Housing density and efficient use of land

Total responses: 31

Main Issues:

- Requirement for design codes on all major developments is excessive and unjustified. (Developers, Planning Consultants)

- Policy lacks clarity on what constitutes “major development” and “sensitive locations.” (Developers, Planning Consultants)
- Design codes may duplicate existing requirements (e.g. masterplans, Design and Access Statements). (Developers)
- Concerns about delays, costs, and council capacity to support design code process. (Developers)
- Policy wording does not reflect national guidance on flexibility. (Developers)
- Policy does not reference biodiversity or ecological value. (Devon Wildlife Trust)

Calls for:

- Limit design code requirement to large, strategic, or phased sites. (Developers, Planning Consultants)
- Define “major development” and “sensitive locations” more clearly. (Developers)
- Clarify relationship between design codes and other planning tools. (Planning Consultants)
- Include reference to conserving and enhancing existing biodiversity value. (Devon Wildlife Trust)
- Amend policy to reflect character conservation in National Landscapes. (Blackdown Hills National Landscape)

DS03 – Display of advertisements

Total responses: 1

Main Issues:

- Policy does not explicitly reference biodiversity or ecological sensitivity. (Devon Wildlife Trust)

Calls for:

- Add requirement for advertisements to be designed with consideration of existing biodiversity value. (Devon Wildlife Trust)

DS04 – Green and blue Infrastructure

Total responses: 10

Main Issues:

- Policy is overly prescriptive and duplicates Natural England guidance. (Developers, Planning Consultants)
- Requirement to meet Natural England’s five principles is not appropriate for individual sites. (Developers)
- Unclear how policy aligns with Biodiversity Net Gain (BNG) and stacking. (Home Builders Federation)
- Concerns about requiring management and maintenance plans at outline stage. (Planning Consultants)

Calls for:

- Limit application of Natural England principles to strategic level. (Developers)
- Clarify how policy relates to BNG and stacking. (Home Builders Federation)
- Include reference to Devon Local Nature Recovery Strategy. (RSPB)

- Ensure long-term maintenance of green and blue infrastructure. (Residents)

11. Sustainable Transport and Communications

Total responses: 72

TR01 – Prioritising walking, wheeling, cycling, and public transport

Total responses: 18

Main Issues:

- Policy is broadly supported but concerns raised about feasibility in rural areas with limited infrastructure. (Planning Consultants, Parish Councils, Residents)
- Disparities in public transport provision across towns are not acknowledged. (Residents)
- Assumptions about accessibility and safety of walking/cycling routes are challenged. (Residents, Cycling Campaigns)
- Policy lacks reference to biodiversity and ecological enhancements. (Environmental Groups)

Calls for:

- Clarify feasibility of aligning with the Bus Services Improvement Plan in rural areas. (Planning Consultants)
- Include biodiversity enhancements in linear transport links. (Devon Wildlife Trust)
- Address disparities in public transport access and service frequency. (Residents)
- Strengthen policy to support traffic-free cycle networks and EV infrastructure. (Community Groups)

TR02 – Protecting transport sites and routes

Total responses: 13

Main Issues:

- General support for safeguarding strategic routes but concerns about deliverability of specific schemes like the Axminster relief road. (Developers, Planning Consultants)
- Policy lacks clarity on cross-boundary coordination and integration with wider networks. (National Trust, National Highways)
- Some strategic routes (e.g. Feniton to Ottery cycle path) are omitted. (Residents, Local Authorities)

Calls for:

- Remove or justify safeguarding of Axminster relief road. (Developers)
- Add missing strategic routes such as Otter Trail and Feniton to Ottery. (Devon County Council, Residents)
- Strengthen partnership working across local authority boundaries. (National Trust, National Highways)

TR03 – Travel plans, transport statements and transport assessments

Total responses: 8

Main Issues:

- Policy largely mirrors national guidance without adding local value. (Planning Consultants, National Highways)
- Lack of clarity on what constitutes “significant” vehicle movements. (National Highways)
- Concerns about duplication with validation requirements and Building Regulations. (Planning Consultants)
- Policy does not address impacts on rail crossings or highway safety. (Network Rail, National Highways)

Calls for:

- Define thresholds for “significant” movements and include people movements. (National Highways)
- Include assessment of rail crossing impacts. (Network Rail)
- Reframe policy as a validation requirement. (Planning Consultants)
- Expand scope to include mitigation of highway safety impacts. (National Highways)

TR04 – Parking standards

Total responses: 16

Main Issues:

- Minimum parking standards (1.7 spaces per dwelling) seen as inflexible and potentially excessive. (Developers, National Highways)
- Cycle parking standards (1 per bedroom) may impact site layout and viability. (Developers, Planning Consultants)
- Exclusion of garages from parking count is contested. (Developers)
- Policy duplicates Building Regulations on EV charging. (Developers)

Calls for:

- Introduce flexibility based on site context and viability. (Developers)
- Allow garages to count as parking if they meet size thresholds. (Developers)
- Amend cycle parking standards to reflect practical constraints. (Developers)
- Clarify or remove EV charging requirements already covered by Building Regulations. (Developers)

TR05 – Aerodrome safeguarded areas and Public Safety Zones

Total responses: 1

Main Issues:

- Policy does not fully reflect safeguarding requirements of Exeter Airport. (Planning Consultants)

Calls for:

- Amend policy wording to include safeguarding requirements in addition to navigational systems. (Planning Consultants)

TR06 – Digital connectivity

Total responses: 6

Main Issues:

- Policy is seen as overly rigid and duplicative of Building Regulations. (Developers, Planning Consultants)
- Concerns about feasibility in rural or isolated areas. (Developers, Parish Councils)

Calls for:

- Introduce flexibility based on site size, location, and viability. (Developers)
- Reframe policy to encourage rather than mandate provision. (Planning Consultants)
- Clarify alignment with Building Regulations. (Developers)

TR07 – Wireless connectivity and telecoms infrastructure

Total responses: 1

Main Issues:

- Policy wording on biodiversity is too weak. (Environmental Groups)

Calls for:

- Replace “avoiding harm” with “protecting and enhancing biodiversity.” (Devon Wildlife Trust)

12. Our Outstanding Landscape

Total responses: 86

OL01: Landscape Features

Total responses: 13

Main Issues:

- The policy is seen as overly rigid and absolute in its requirement that development “would not harm” the landscape. (Planning Consultants)
- Concerns that aesthetic and perceptual factors (e.g. tranquillity, dark skies) are subjective and difficult to assess. (Planning Consultants)
- Calls for greater clarity on how landscape mitigation and enhancement should be demonstrated. (Planning Consultants)
- Lack of reference to rivers, watercourses, and waterbodies is seen as a missed opportunity. (Environment Agency)
- Potential for site allocations to conflict with the aims of this policy (Individuals)
- Importance of hedgerow connectivity for biodiversity (e.g. bat flightlines) should be acknowledged. (Devon Wildlife Trust)

Calls for:

- Rewording to allow for balanced judgement of landscape impacts. (Planning Consultants)
- Inclusion of rivers and waterbodies in the list of valued features. (Environment Agency)
- Potential for the establishment of sustainable agricultural practices as well as maintaining them (Environment Agency)
- Recognition of habitat fragmentation risks. (Devon Wildlife Trust)

OL02: National Landscapes (AONBs)

Total responses: 9

Main Issues:

- General support for the policy's intent to protect National Landscapes. (Historic England, National Trust, Individuals)
- Concern that the policy conflates development within and outside National Landscapes, applying the same level of protection to both. (Planning Consultants, Individuals)
- The policy does not reflect the updated legal duty to "seek to further" the purposes of protected landscapes under the Levelling Up and Regeneration Act 2023. (Natural England, Individuals)

Calls for:

- Clear distinction between development within and in the setting of National Landscapes. (Planning Consultants)
- Explicit reference to the statutory duty to "seek to further" the purposes of National Landscapes. (Natural England)
- Recommend additional paragraph to note the legal protection and management of the National Landscapes and Heritage Coasts provide for the Jurassic Coast WHS (Jurassic Coast World Heritage Site (hosted by Dorset Council))

OL03: Coastal Preservation Areas

Total responses: 7

Main Issues:

- Strong objections to the reduction of CPA boundaries, particularly between Fortescue and the A3052. (Planning Consultants, National Trust, Individuals)
- Concerns that the CPA review lacks robust fieldwork and relies too heavily on desktop assessments. (Planning Consultants)
- The policy lacks integration with the Coastal Change Management Area (CCMA) policy. (Environment Agency)
- The policy is seen as overly restrictive and not sufficiently evidence-based. (Planning Consultants)

Calls for:

- Reinstatement of omitted CPA areas. (Planning Consultants, Individuals)
- Stronger evidence base and clearer justification for boundary changes. (Planning Consultants)
- Linkage with CCMA policy for clarity in decision-making. (Environment Agency)

OL04: Areas of Strategic Visual Importance

Total responses: 15

Main Issues:

- Broad support for protecting key views, especially those linked to heritage assets. (Historic England)

- Concerns that the policy is too vague and could be used as a “catch-all” to resist development. (Planning Consultants)
- Calls for clearer mapping and identification of strategic views. (Planning Consultants)
- Recognition that not all changes to views are harmful; development can also create new valued views. (Planning Consultants)

Calls for:

- Mapping of strategic views on the proposals map. (Planning Consultants)
- Rewording to acknowledge that not all visual changes are adverse. (Planning Consultants)
- Clarification of how the policy interacts with other designations. (Planning Consultants)
- Acknowledge that views relating to heritage assets are also protected for the ‘significance’ of the asset (Historic England)

OL05: Green Wedges

Total responses: 16

Main Issues:

- Mixed views: some support the principle of Green Wedges, others argue the designations are too extensive and not evidence-based. (Planning Consultants, Parish Councils, Individuals)
- Objections to specific inclusions (e.g. land north of Sowton, Newcourt Barton Business Park) where development is seen as compatible or already established. (Planning Consultants)
- Concerns that the policy may hinder delivery of Biodiversity Net Gain (BNG) or Suitable Alternative Natural Greenspace (SANGS). (Home Builders Federation)
- Loss of reference to climate and flood storage benefits of green wedges and the need to protect them (Environment Agency)
- Objections to the reduction in scale of specific Green Wedges by site allocations (Lymp_07 and Exmo_28) (National Trust)

Calls for:

- Reassessment and reduction of Green Wedge boundaries based on robust evidence. (Planning Consultants)
- Clarification of acceptable development types within Green Wedges. (Home Builders Federation)
- Recognition of multi-functional benefits (e.g. flood storage, climate resilience). (Environment Agency)

OL06: Land of Local Amenity Importance and Local Green Space

Total responses: 2

Main Issues:

- General support for protecting local green spaces. (Individuals, Parish Councils)
- Concern that the policy only applies to spaces designated through Neighbourhood Plans, potentially excluding valued but undesignated spaces. (Individuals)

Calls for:

- Broader criteria for designation, including local knowledge and historical use. (Individuals)
- Higher BNG expectations in areas of high ecological value. (Devon Wildlife Trust)

OL07: Contaminated Land

Total responses: 1

Main Issues:

- Support for requiring contaminated land assessments. (Devon County Council)
- Suggestion to include consultation with the waste planning authority for development near waste sites. (Devon County Council)

Calls for:

- Addition of reference to Devon Waste Plan Policy W10. (Devon County Council)

OL08: Potentially Hazardous Developments and Notifiable Installations

Total responses: 0

Main Issues:

- No significant objections or detailed comments identified in the reviewed responses.

OL09: Control of Pollution

Total responses: 4

Main Issues:

- General support for the policy's intent. (Environment Agency, Individuals)
- Concerns that the policy lacks enforcement mechanisms and does not address existing pollution issues (e.g. sewage discharges into the River Otter and Exe Estuary). (Individuals, Otter Valley Association)
- Suggestion to include rainwater/roof water diversion to prevent pollution. (Individual)

Calls for:

- Stronger enforcement provisions. (Individuals)
- Specific reference to rainwater management. (Individual)
- Clarification on timing and submission of Construction Environmental Management Plans (CEMPs). (Environment Agency)

OL10: Development on High Quality Agricultural Land

Total responses: 13

Main Issues:

- Widespread concern from developers and planning consultants that the policy is overly restrictive and not aligned with the NPPF. (Planning Consultants, Developers)
- Objections to the lack of clarity on how alternative land assessments will be conducted. (Planning Consultants)
- Some support for the principle of protecting best and most versatile land, provided it is balanced with development needs. (Planning Consultants, Parish Councils)

Calls for:

- Removal or significant rewording of the policy to align with NPPF paragraph 180(b) and footnote 62. (Planning Consultants)
- Clarification of assessment responsibilities and criteria. (Planning Consultants)

13. Our Outstanding Biodiversity and Geodiversity

Total responses: 193

PB01 – Protection of internationally and nationally important wildlife sites

Total responses: 6

Main Issues:

- General support for the principle of protecting designated sites. (Planning Consultant)
- Concerns about clarity in the policy wording and the scope of compensation areas. (Environment Agency)

Calls for:

- Rephrase the opening sentence for clarity on the hierarchy of protection. (Environment Agency)
- Strengthen requirements for justification and securing of compensation. (Environment Agency)
- Clarify whether areas like the Clyst Valley Regional Park are included under compensation sites. (Environment Agency)

PB02: Protection of regionally and locally important wildlife sites

Total responses: 6

Main Issues:

- Support for the requirement that sites be surveyed in the optimal botanical period by a suitably experienced botanist. (Public body – Environment Agency)
- Concern that the phrase “like-for-like habitat restoration” is ambiguous and does not reflect the ecological reality of habitat replacement, particularly for complex habitats like wood-pasture and parkland. (Public body – Devon Wildlife Trust)
- Concern that the policy does not require assessment of species presence (e.g. s41 priority species), which is necessary to fully understand biodiversity value. (Public body – RSPB)
- Recommendation that the policy should explicitly include Habitats of Principal Importance under Section 41 of the NERC Act 2006. (Public body – Natural England)
- Concern that the policy does not address the role of ecological linkages between sites of ecological importance. (Local group – Otter Valley Association)

Calls for:

- Rephrase “like-for-like habitat restoration” to reflect the time lag and complexity of habitat replacement, and require use of the most recent DEFRA biodiversity metric. (Public body – Devon Wildlife Trust)
- Amend the policy to require surveys for priority species at appropriate times of year, in addition to botanical surveys. (Public body – RSPB)

- Add “Habitats of Principal Importance” to the list of sites covered by the policy. (Public body – Natural England)
- Include a criterion to ensure development does not compromise ecological linkages between important sites. (Local group – Otter Valley Association)
- Require biodiversity mitigation and compensation measures to be implemented before any loss of existing biodiversity occurs. (Local group – Otter Valley Association)

PB03 – Protection of irreplaceable habitats and important features

Total responses: 15

Main Issues:

- Objection to treating species-rich Devon hedges and mature trees as irreplaceable habitats. (Planning Consultants)
- Concerns about vague language such as “evidenced in earnest.” (Planning Consultant)

Calls for:

- Remove mature trees and Devon hedges from the list of irreplaceable habitats. (Planning Consultants)
- Replace vague terms with clearer language such as “robustly evidenced.” (Planning Consultant)

PB04 – Habitats Regulations Assessment

Total responses: 13

Main Issues:

- General support for the principle of avoiding adverse effects on designated sites. (Planning Consultant)
- Concerns about duplication of existing regulations and lack of clarity on mitigation requirements. (Planning Consultants)

Calls for:

- Move references to guidance documents to supporting text to avoid giving them development plan status. (Planning Consultant)
- Include specific mitigation requirements and occupancy rates for SANGs. (Planning Consultant)
- Clarify scale thresholds for on-site SANG provision. (Planning Consultant)

PB05 – Biodiversity Net Gain

Total responses: 60

Main Issues:

- Widespread objection to the 20% BNG requirement as unjustified and inconsistent with national policy. (Planning Consultants)
- Concerns about viability, land take, and delivery implications. (Planning Consultants)
- Some support for the ambition of 20% BNG. (Environment Agency, RSPB)

Calls for:

- Align BNG requirement with the statutory 10% unless robust local evidence is provided. (Planning Consultants)
- Clarify terminology and avoid duplication with national validation requirements. (Planning Consultant)
- Provide flexibility for self-build and exempt developments. (Planning Consultant)

PB06 – Local Nature Recovery Strategy and Nature Recovery Network

Total responses: 8

Main Issues:

- General support for the policy's strategic approach to nature recovery. (Planning Consultant)
- Concerns about overly broad language and feasibility of off-site BNG delivery. (Environment Agency)

Calls for:

- Clarify expectations for off-site BNG contributions and their relationship to NRNs. (Environment Agency)
- Remove ambiguity around "green links" and include blue infrastructure. (Environment Agency)

PB07 – Ecological enhancement and biodiversity in the built environment

Total responses: 24

Main Issues:

- Support for ecological enhancement in principle. (Planning Consultants)
- Objections to prescriptive requirements for bat lofts and overhanging eaves. (Planning Consultants)
- Concerns about flexibility and site-specific relevance. (Planning Consultants)

Calls for:

- Remove or revise requirements for bat lofts and house martin eaves. (Planning Consultants)
- Provide flexibility based on ecological appraisals. (Planning Consultant)

PB08 – Trees, hedges and woodland on development sites

Total responses: 23

Main Issues:

- Support for tree and hedge protection in principle. (Planning Consultant)
- Concerns about prescriptive language, duplication of British Standards, and cost implications. (Planning Consultants)

Calls for:

- Simplify policy and remove duplication with PB03. (Planning Consultants)
- Clarify references to external guidance to avoid giving them development plan status. (Planning Consultant)

- Strengthen language to require integration of protected assets into design. (Environment Agency)

PB09 – Monitoring requirements for new planting schemes

Total responses: 23

Main Issues:

- Strong objections to the requirement for a 25% financial bond. (Planning Consultants)
- Concerns about viability, administrative burden, and lack of justification. (Planning Consultants)

Calls for:

- Remove or substantially revise the bond requirement. (Planning Consultants)
- Clarify enforcement mechanisms and responsibilities post-transfer to management companies. (Planning Consultant)

PB10 – Protection and enhancement of the Jurassic Coast World Heritage Site

Total responses: 2

Main Issues:

- General support for the policy's intent. (Historic England)

Calls for:

- Reference UNESCO's guidance for impact assessments. (Historic England)

PB11 – Protection of designated geological sites

Total responses: 0

Main Issues:

- No objections identified in the consultation responses.

Calls for:

- None identified.

PB12 – Regionally Important Geological and Geomorphological Sites

Total responses: 0

Main Issues:

- No objections identified in the consultation responses.

Calls for:

- None identified.

14. Open Space and Sports and Recreation

Total responses: 54

OS01: Access to open space and recreation facilities

Total responses: 12

Main Issues:

- Broad support for the principle of requiring high-quality open space in new development. (Planning Consultants, Developers)
- Concern that the policy implies all developments must include formal sports facilities, which may not be appropriate for all sites. (Planning Consultants)
- Uncertainty over whether the Council or applicants are responsible for assessing existing provision. (Planning Consultants)
- Calls for inclusion of natural environment enhancement and protection of existing open spaces. (Devon Wildlife Trust, Individuals)
- Suggestion to incorporate crime prevention and safety design principles, particularly to address violence against women and girls. (Devon & Cornwall Police)

Calls for:

- Clarify that formal sports provision should be considered on a case-by-case basis. (Planning Consultants)
- Specify that the Council will maintain the open space evidence base. (Planning Consultants)
- Include reference to biodiversity enhancement and protection of existing facilities. (Devon Wildlife Trust, Individuals)
- Reference design principles that promote safety and inclusivity in open spaces. (Devon & Cornwall Police)

OS02: Sport, recreation and open space provision in association with development

Total responses: 21

Main Issues:

- Strong support for using Fields in Trust standards. (Planning Consultants, Developers)
- Widespread objection to the inclusion of Natural England's Green Infrastructure and Accessible Greenspace Standards, which are seen as overly prescriptive and not locally justified. (Planning Consultants, Developers)
- Objections to the requirement for developers to conduct open space audits for schemes over 200 dwellings. (Planning Consultants, Developers)
- Concerns that the policy's additional requirements for developments over 200 and 300 dwellings are unrealistic, unviable, and risk creating ransom situations. (Planning Consultants, Developers)
- Ambiguity around occupancy rates used for calculating open space, particularly in relation to Cranbrook. (Planning Consultants)

Calls for:

- Remove or revise references to Natural England standards. (Planning Consultants)
- Delete or significantly revise the additional requirements for large developments. (Planning Consultants)
- Clarify and standardise occupancy rates across policies. (Planning Consultants)

- Acknowledge that open space provision should be site-specific and allow for off-site contributions where appropriate. (Planning Consultants)
- Include reference to biodiversity enhancement. (Devon Wildlife Trust)

OS03: Location of facilities for sport and recreation and open space

Total responses: 5

Main Issues:

- General support for the policy's intent to support new and enhanced facilities. (Planning Consultants, Individuals)
- Suggestion to strengthen the policy by requiring protection and enhancement of biodiversity. (Devon Wildlife Trust)
- Recommendation to ensure accessibility for users with impaired mobility. (Individuals)

Calls for:

- Add requirement to protect and enhance biodiversity. (Devon Wildlife Trust)
- Include accessibility considerations for people with mobility impairments. (Individuals)

OS04: New allotments and avoiding the loss of existing ones

Total responses: 3

Main Issues:

- Support for the principle of encouraging new allotments where well located and environmentally appropriate. (Planning Consultants)
- Suggestion to strengthen the policy by requiring biodiversity protection and enhancement. (Devon Wildlife Trust)

Calls for:

- Add requirement to protect and enhance biodiversity. (Devon Wildlife Trust)

OS05: Leisure and recreation developments in the countryside

Total responses: 3

Main Issues:

- General support for the policy's approach to countryside recreation. (Planning Consultants, Individuals)
- Suggestion to explicitly include heritage impacts in the assessment criteria. (Historic England)
- Recommendation to strengthen biodiversity expectations in line with the Environment Act 2021. (Devon Wildlife Trust)

Calls for:

- Add reference to heritage impacts in part A of the policy. (Historic England)
- Replace "ideally should generate improvements" with a requirement to deliver biodiversity enhancements. (Devon Wildlife Trust)

15. Our Outstanding Historic Environment

Total responses: 51

HE01: Historic Environment

Total responses: 12

Main Issues:

- General support for the principle of conserving and enhancing heritage assets, including non-designated ones. (Planning Consultants, Historic England, Individuals)
- Concern that the policy duplicates or exceeds the National Planning Policy Framework (NPPF), particularly regarding non-designated heritage assets. (Planning Consultants, Developers)
- Request for stronger language around habitat connectivity and integration with green infrastructure. (Environment Agency)
- Concern that the policy lacks clarity on the requirement for impact assessments. (Historic England)

Calls for:

- Clarify that impact assessments should accompany significance assessments. (Historic England)
- Remove or revise language that goes beyond NPPF requirements, especially for non-designated assets. (Planning Consultants, Developers)
- Strengthen language around design integration with environmental features by removing “where possible.” (Environment Agency)

HE02: Listed Buildings

Total responses: 14

Main Issues:

- Support for the structured approach to heritage assessment. (Historic England, National Trust, Planning Consultants)
- Concern that the policy is overly prescriptive and internally inconsistent. (Planning Consultants, Developers)
- Confusion caused by multiple sets of criteria (A–C and A–D) and unclear references to unknown features. (Planning Consultants, Developers)
- Objection to the use of “exceptional circumstances” in the context of less than substantial harm. (Planning Consultants)

Calls for:

- Align tests for harm and public benefit with NPPF paragraph 208. (Historic England, Planning Consultants)
- Simplify and restructure the policy to avoid confusion. (Planning Consultants, Developers)
- Remove or clarify the use of “exceptional circumstances” in the context of less than substantial harm. (Planning Consultants)

HE03: Conservation Areas

Total responses: 5

Main Issues:

- General support for the policy's intent to conserve and enhance Conservation Areas. (Historic England, Planning Consultants)
- Concern that the policy duplicates the NPPF and imposes higher-bar tests without justification. (Planning Consultants, Developers)

Calls for:

- Simplify and align with NPPF Chapter 16. (Planning Consultants, Developers)
- Remove or revise duplicative or overly detailed provisions. (Planning Consultants, Developers)

HE04: Archaeology and Scheduled Monuments

Total responses: 9

Main Issues:

- Support for the policy's intent to protect archaeological assets. (Historic England, Planning Consultants)
- Concern that the opening sentence implies no harm is ever acceptable, which contradicts later sections. (Planning Consultants, Developers)
- Objection to the use of "exceptional" in relation to non-designated archaeology. (Historic England)
- Concern that the policy repeats national guidance without adding value. (Planning Consultants, Developers)

Calls for:

- Remove or revise the opening sentence to align with the rest of the policy and the NPPF. (Planning Consultants, Developers)
- Remove the word "exceptional" from the paragraph on non-designated archaeology. (Historic England)
- Clarify the treatment of designated vs. non-designated archaeological assets. (Planning Consultants, Developers)

HE05: Historic Landscapes, Parks and Gardens

Total responses: 3

Main Issues:

- General support for the policy's alignment with national policy. (Planning Consultants, Historic England)
- Concern that the policy duplicates requirements already covered in HE01. (Historic England)

Calls for:

- Adjust the opening sentence to include "historic interest, character and setting." (Historic England)
- Remove or revise the penultimate paragraph to avoid duplication with HE01. (Historic England)

16. Community Facilities

Total responses: 17

CF01: New or extended community facilities

Total responses: 8

Main Issues:

- General support for the principle of encouraging new or extended community facilities. (Planning Consultants, Individuals)
- Concern that the policy should allow flexibility for facilities not located near existing built-up areas if justified by new development. (Planning Consultants)
- Criticism that the policy lacks enforceability and should require developers to provide community need and investment plans. (Individuals)
- Concern over lack of reference to infrastructure such as schools, healthcare, water, and sewerage. (Individuals, Chartered Surveyor)
- Concern that existing facilities are already over capacity and further development must be tied to service investment. (Individuals)
- Concern about the absence of secondary school provision in the context of large-scale housing growth. (Individuals)

Calls for:

- Revise the policy to allow case-by-case consideration of community facility location, especially in new developments. (Planning Consultants)
- Strengthen the policy to require developers to submit community need and investment plans. (Individuals)
- Include explicit references to primary care, secondary education, and utility infrastructure. (Individuals, Chartered Surveyor)
- Require collaboration with service providers such as NHS trusts and South West Water. (Individuals)

CF02: Loss of community facilities

Total responses: 7

Main Issues:

- General support for protecting community facilities from loss unless justified. (Individuals, Planning Consultants)
- Concern that terms like “shorter and longer term” and “community value” are vague and undefined. (Planning Consultants)
- Suggestion that the policy should allow for loss of facilities if outweighed by greater social, economic, or environmental benefits. (Planning Consultants)
- Concern that the definition of “community facilities” is too broad and needs clarification. (Planning Consultants)

Calls for:

- Define specific timeframes for marketing and clarify terminology such as “community value.” (Planning Consultants)
- Add a test allowing loss of facilities if justified by greater public benefits. (Planning Consultants)
- Provide a tighter definition of “community facilities” and reconsult if necessary. (Planning Consultants)

17. Implementation and Monitoring

Total responses: 11

Main Issues:

- Concern that the chapter lacks a clear and actionable monitoring framework, particularly for housing delivery. (Home Builders Federation)
- Concern that the plan relies too heavily on future plan reviews rather than immediate corrective actions when under-delivery occurs. (Home Builders Federation)
- Lack of specific monitoring indicators for heritage assets, with only general reference to the heritage strategy. (Historic England)
- Absence of monitoring for transport and traffic impacts, including development Travel Plans and the Greater Exeter Transport Strategy. (National Highways)
- Concern that the chapter lacks monitoring of environmental indicators, including nitrogen emissions and mitigation effectiveness for protected habitats. (RSPB, Lympstone Water Quality Group)
- Absence of implementation detail and solutions to address identified issues. (Ottery St Mary Town Council, Individuals)
- Concern that the chapter does not define what constitutes “deliverable” development or address economic viability. (Individuals)
- Lack of reference to design quality monitoring and the need for design oversight in new developments. (Individuals)
- Desire for greater recognition of the role of Housing Associations and Community Land Trusts in delivering affordable housing. (South West Housing Association Planning Consortium)
- General support for the clarity and structure of the chapter. (Individuals)

Calls for:

- Include a detailed monitoring framework with specific targets, triggers for action, and mechanisms to address under-delivery. (Home Builders Federation)
- Add explicit reference to reserve sites or windfall policies to address housing shortfalls. (Home Builders Federation)
- Introduce specific heritage indicators such as assets on the Heritage at Risk Register and applications granted contrary to heritage policy. (Historic England)
- Add monitoring of transport outcomes and Travel Plan effectiveness, especially for large-scale developments. (National Highways)
- Include environmental monitoring for nitrogen deposition, SANG effectiveness, and mitigation for protected sites. (RSPB, Lympstone Water Quality Group)

- Define “deliverable” and include economic viability assessments at the plan-making stage. (Individuals)
- Require design managers or similar roles to oversee quality and integration of new developments. (Individuals)
- Add “Collaboration with Registered Providers” to the delivery mechanisms for affordable housing policies. (South West Housing Association Planning Consortium)
- Acknowledge the role of Community Land Trusts in delivering local affordable housing. (South West Housing Association Planning Consortium)

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Sustainability Appraisal

Total responses: 66

Main Issues:

- Exmo_20 was deemed “not suitable or achievable” in the HELAA and should not have been allocated. (Individuals, community groups)
- Contradictions exist between HELAA and SA documents regarding site suitability. (Individuals, planning consultants)
- Lack of consultation and transparency in the allocation process for Exmo_20. (Individuals, community groups)
- Inconsistent treatment of Exmo_20 compared to other sites such as Exmo_04. (Individuals, community groups)
- Exmo_20 is located within Strategic Nature Area 368 and adjacent to Pebblebed Heaths SPA/SAC, raising biodiversity concerns. (Individuals, community groups)
- The Sustainability Appraisal fails to apply the Mitigation Hierarchy consistently. (Individuals, planning consultants)
- The SA has a limited focus on water quality, sewage capacity, and flood risk. (Environment Agency)
- Exmo_20 drains into Withycombe Brook, a known flood risk area not assessed in the Strategic Flood Risk Assessment. (Individuals)
- Exmo_20 is in an unsustainable location, increasing reliance on car travel. (Planning consultants, individuals)
- Use of 1,600m as a walkability metric is misleading and inconsistent with national guidance. (Planning consultants, individuals)
- Exmo_20's access via the B3179 is unsuitable and unsafe for a large development. (Individuals, planning consultants)
- Lack of realistic walking/cycling infrastructure and public transport links for Exmo_20. (Individuals, planning consultants)
- The SA and site selection process are not legally compliant or sound under the NPPF. (Planning consultants, individuals, community groups)
- Natural England was not consulted prior to allocation of Exmo_20, despite its proximity to designated sites. (Individuals, community groups)
- Exmo_20 was allocated before the Habitat Regulations Assessment was published. (Individuals, community groups)
- The map used to depict Exmo_20 was inaccurate and included land not available for development. (Individuals)
- Alternative sites identified as “preferred” in the Strategic Planning Committee agenda of 3 September 2024 were not allocated. (Planning consultants, individuals)
- Sustainability Appraisal submitted for Land at Addlepool Farm, Land off Northcote Hill, and Greenhayes. (Planning consultants)

Calls for:

- Reassess Exmo_20's allocation based on HELAA findings and legal compliance. (Planning consultants, individuals)

- Apply biodiversity and flood risk criteria consistently across all sites. (Environment Agency, individuals)
- Use accurate and standardised metrics for walkability and sustainability. (Planning consultants, individuals)
- Improve transparency and documentation in the site selection process. (Individuals, community groups)
- Prioritise sites that align with the Mitigation Hierarchy and national policy. (Individuals, planning consultants)
- Allocate Land at Addlepool Farm and Greenhayes, and increase the capacity for Land off Northcote Hill. (Planning consultants)

DRAFT

Report to: Strategic Planning Committee

Date of Meeting 8 July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



East Devon Local Plan – Local Development Scheme

Report summary (and report details in full):

This report sets out details of a proposed revised Local Development Scheme (attached as Appendix 1) – this forms the formal project plan for future local plan production. A revision is needed to the existing Local Development Scheme in light of proposed amendments to the local plan making timetable, as reported separately to the committee. The timetable now incorporates a second reg 19 consultation in the Autumn to address both the second new community and associated evidence as previously envisaged but also a further iteration of the Local Plan itself.

The Council constitution requires that Cabinet endorse the new Local Development Scheme and recommend it to Council, hence the recommendation.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Strategic Planning Committee recommend to Cabinet that the proposed new Local Development Scheme, at Appendix 1, is adopted.

Reason for recommendation:

To ensure adoption of a new Local Development Scheme.

Officer: Ed Freeman – Assistant Director Planning Strategy and Development Manager

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☒ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☒ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☒ Place, Infrastructure and Strategic Planning
- ☐ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Low Impact

Risk: No specific risk impacts are identified.

Links to background information Links are contained in the body of the report.

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
 - ☒ Carbon neutrality and ecological recovery
 - ☒ Resilient economy that supports local business
 - ☒ Financially secure and improving quality of services
-

Financial implications:

There are no direct financial implications identified within the report. (AB/24/06/2025)

Legal implications:

The legal implications are set out in the proposed revised Local Development Scheme attached as Appendix 1 to this report (002533/24 June 2025/DH).

East Devon Local Development Scheme – July 2025

The work programme for planning policy production in East Devon



East Devon – an outstanding place

Contact details

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1 Introduction

- 1.1 This East Devon District Council Local Development Scheme (LDS) sets out a programme and timetable for production of future planning policy documents by the Council.
- 1.2 East Devon District Council has resolved that this new LDS should take effect from **insert date once agreed** 2025. This LDS covers the time period from Summer 2024 through to 2027, it is envisaged however that it will be revised and superseded before this end date.

2 The stages in Development Plan Document preparation

- 2.1 Development Plan Documents (DPDs) sit at the top of the hierarchy of District Council planning policy documents, on adoption they form part of what is defined as the Development Plan. The term 'local plan' is often used interchangeably with DPD and the Council has an adopted plan (which is a DPD) called the 'East Devon Local Plan'.
- 2.2 DPDs are of fundamental importance in respect of informing prospective developers of the types of development and locations for development that are likely to be appropriate and they are the key policy documents used in determining planning applications. DPDs also inform communities, infrastructure and service providers and other council and wider service providers of development proposals. There are specific legally defined procedural steps that need to be complied with by the Council in order to produce a DPD, some of these are referred to in this LDS, however for a more complete picture see: The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), noting that future changes may be made: <http://www.legislation.gov.uk/ukxi/2012/767/contents>
- 2.3 In this LDS we set out dates for undertaking key stages in production of any DPD. The stages we report on are summarised below:
 - Issues Consultation – this is the starting point where comments on general issues and plan scope are sought. At this stage of plan making potential options and alternatives for development may be identified.
 - Draft plan – this is where a draft version of the plan or some other consultation document or documents are produced and feedback is sought.
 - Publication – this is the plan that the Council intend to submit for examination. The plan is made available and formal objections and other responses are sought from at this stage. Anyone can comment.

- Submission – the publication plan, the evidence supporting the plan and the formal responses to the plan are submitted to the government who appoint an independent inspector to consider the soundness of the plan. The examination of a plan, carried out by a Planning Inspector, starts at plan submission.
- Examination – as part of the examination process there will typically be hearing sessions at which the Inspector will lead discussion on the contents of the plan, this helps the Inspector prepare their report.
- Adoption – the Council receive a report from the inspector and can then, assuming earlier tasks do not need to be revisited, adopt the plan.

2.4 It is stressed that the above stages are a much-simplified version of what happens in plan making, however they give an overview of plan preparation timelines. Government plan making regulations and legislation (and other guidance) should be reviewed for a complete picture of legislative processes that have to be followed.

3 The adopted East Devon Local Plan, the Villages Plan and the Cranbrook Plan

3.1 There are three existing current East Devon District Council adopted DPDs:

- The existing East Devon Local Plan, covering most policy matters across the district, was adopted on the 28 January 2016.
- An East Devon Villages Plan, adopted on 26 July 2018, has a much more narrowly defined remit of defining Built-up Area Boundaries around selected village settlements and it defines retail policy for Beer and Colyton.
- The Cranbrook Plan covers development matters at the new town and was adopted on 19 October 2022.

3.2 It should be noted that policies in local plans should be reviewed at least every five years to assess whether they need updating, and the reasons for decision should be published. A formal review of the adopted East Devon Local Plan was undertaken in 2020/21.

4 Future Development Plan Documents in East Devon

4.1 This LDS sets out that from now, through to 2027, there will be one further DPD that will be produced by the Council, summary details with dates set against key stages, are set out below. It should be noted that the dates (year and months or season/part of year) provided are based on what we currently know or best estimates, changes over time are, however, possible.

- 4.2 **East Devon Local Plan 2020 to 2042**– the expectation is that this plan will address all Development Plan matters, alongside and in many cases in conjunction with the Cranbrook plan for matters Cranbrook, that fall to the responsibility of East Devon District Council. The following is the timetable for production:
- Issues Consultation – completed in January 2021.
 - Draft plan – the first consultation was completed in January 2023 and there was further consultation in summer 2024.
 - Publication – Regulation 19 consultation:
 - Main – was concluded in March 2025.
 - Further – projected to start in Autumn 2025.
 - Submission – Spring 2026.
 - Examination, including Inspector’s Hearings – 2026.
 - Adoption – 2027.
- 4.3 The above timetable sets out two stages of Publication consultation. The first was for the full local plan. We did, however, reserve the position to undertake some plan refinement. This was specifically so for the second new community and this relates to evidence relevant to plan policy. The second round of consultation will provide scope to make potential further changes to wider elements of the plan and consult on these.
- 4.4 It should be noted that the intent is that the new local plan will supersede and replace in its entirety the existing local plan and also the villages Plan. The Cranbrook Plan will remain part of the Development Plan though some policies within it will be superseded by new local plan policies.

5 Other policy documents identified for production

- 5.1 In addition to DPDs the Council also produce a number of additional policy documents. Of greatest importance in respect of determining planning applications are Supplementary Planning Documents (SPDs). SPDs (or documents of a similar nature that may come in under future reforms to planning legislation) are intended to provide more detail on the use and implementation on policies in DPDs. Procedures for producing SPDs are set out in legislation and regulations and the Council has a protocol for SPD production, see:
<https://eastdevon.gov.uk/media/2443645/spd-protocol-adopted-by-spc-20-march-18.pdf>
- 5.2 SPDs need to go through two stages of consultation but they are not subject to examination and therefore their preparation is shorter and simpler than DPDs; but they do not carry the same weight in decision making.

- 5.3 The Planning Policy team of the Council may also produce further guidance and advice to support and promote development and promote wider social and environmental objectives. Such guidance will not have the formal status of an SPD but we will often look to follow similar processes in production. Other services of the Council may also provide guidance documents.

6 Community Infrastructure Levy - Charging Schedule

- 6.1 In East Devon a financial charge, called a Community Infrastructure Levy (CIL), is placed on certain types of new development (most notably new housing) and monies raised are used to help pay for infrastructure that is needed to support development.
- 6.2 In order to be able to charge CIL the Council had to produce a charging schedule that is supported by financial viability assessment evidence, undertake consultation and take the work to Examination by an independent examiner. In this respect production of the CIL charging schedule follows a similar path to that for DPDs (but under separate legislation). The current charging schedule was approved in 2020 and applied from 1 February 2021. A timetable for production of a new CIL charging regime is to be established. Work is projected to start in 2025.

7 Neighbourhood Plans

- 7.1 Neighbourhood Plans are produced by local communities and in East Devon they are typically produced at the parish level, by parish / town councils. Neighbourhood Plans set out policies and proposals for development and in this respect, they are similar to DPDs and they follow reasonably similar stages in production (but under separate legislation). Once adopted (the technical term is that they are 'made'), they also form part of the Development Plan for the District and are used alongside DPDs, SPDs and other policy documents in the determination of planning applications.
- 7.2 For more information on Neighbourhood Plans see:
<https://eastdevon.gov.uk/planning/planning-policy/neighbourhood-and-community-plans/>

8 Waste and minerals planning and Devon County Council work

- 8.1 The responsibility for waste planning and minerals planning in East Devon rests with Devon County Council; they have legal responsibility for producing plans and determining planning applications for these two matters. The County Council adopted a new Devon waste plan in 2014 and adopted a new minerals plan in 2017. For more information see:
<https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy>

- 8.2 The adopted waste plan and adopted minerals plan are also part of the Development Plan for East Devon.

EAST DEVON DISTRICT COUNCIL**Minutes of the meeting of Community Infrastructure Levy Working Party held online on Teams on 3 July 2025****Attendance list at end of document**

The meeting started at 10.00 am and ended at 10.40 am

4 Declarations of Interest

There were no declarations of interest.

5 Exmouth Rugby Club - Revised Project and CIL Bid

The purpose of the meeting was to consider a revised application for funding from Exmouth Rugby Club. The S.106 Monitoring Officer outlined the background to the revised application. Previous funding had been agreed by the Strategic Planning Committee, however, due to issues with the ground works for the proposed extension, the revised proposal was to re-purpose an existing store-room into two changing rooms.

The working party discussed the revised proposal and the following points were included:

- A lower amount than that of £100k previously approved could be granted in order to promote investment by the Rugby Club;
- As £100k had previously been agreed, the full amount should be granted;
- EDDC has higher priorities for CIL funding;
- The Rugby Club would still be investing its own funds as it would be repaying the loan which was part of the overall funding for the project;
- The application for funding should be referred back to the Strategic Planning Committee for further consideration;
- Clarification was needed as to whether the Rugby Club was VAT registered or not, and could reclaim VAT paid;
- The amount approved could be made conditional on the Rugby Club's VAT status;
- The Senior Leisure Officer could visit the Rugby Club and report back to the Strategic Planning Committee;
- It was noted that time was a major consideration for the project.

Cllr Hayward proposed that £100,000 be awarded in principle to the Rugby Club, with this sum to be reduced to £67,000 if it can be evidenced that the VAT on the project can be reclaimed by the Club. This was seconded by Cllr Davey and was agreed.

Clarification of the VAT status should be undertaken by the appropriate Officer, following which the decision could be implemented.

It was also agreed that the application for funding forms should be amended in future to show whether the applicant could reclaim VAT on their project.

RECOMMENDATION TO STRATEGIC PLANNING COMMITTEE

That £100,000 be awarded in principle to Exmouth Rugby Club, with this sum to be reduced to £67,000 if it can be evidenced that the VAT on the project can be reclaimed by the Club.

Attendance List

Councillors present:

I Barlow
K Blakey
C Burhop
O Davey
P Hayward
M Howe
T Olive (Chair)

Councillors also present (for some or all the meeting)

R Collins
N Hookway

Officers in attendance:

Sarah Jenkins, Democratic Services Officer
Jonathan Smith, Planning Obligations Team Leader
Melissa Wall, Section 106 Monitoring Officer

Councillor apologies:

Chair

Date: