

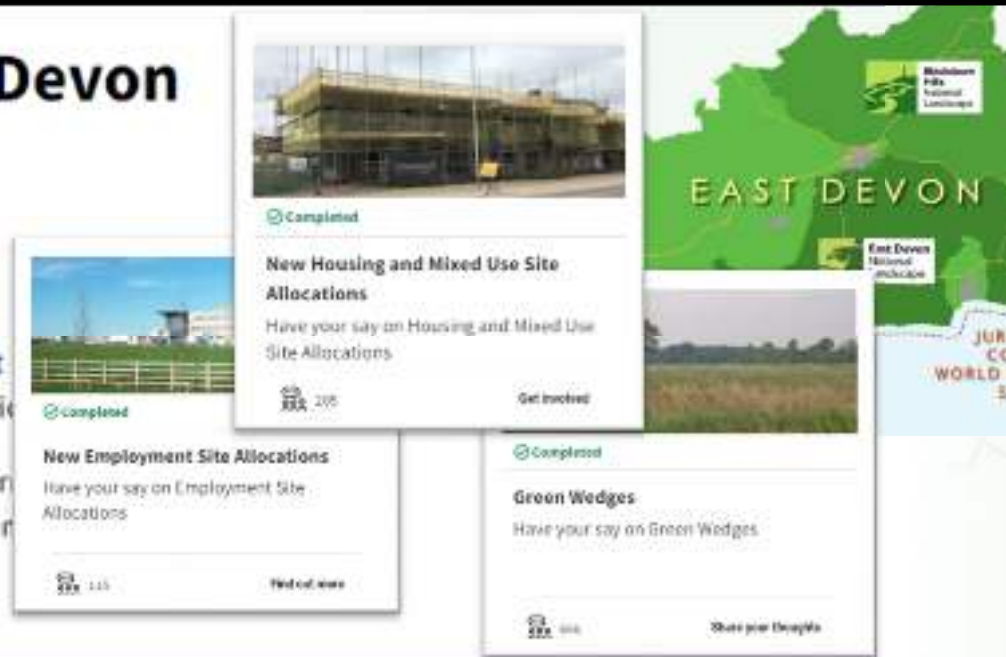
Feedback report on the draft East Devon Local Plan (Regulation 18) Further Consultation (16 May to 27 June 2024)

[Completed] East Devon Local Plan further consultation

We are preparing a new Local Plan for East Devon to guide future development across the district.

We need your input to create a locally informed future of this outstanding district we live and work in.

This consultation is now CLOSED.



October 2024

Executive summary

A Further Consultation on selected topics in the draft East Devon Local Plan started on 16 May 2024 and ended on 27 June 2024. Summary comments on responses received are highlighted in this feedback report but at this stage we do not provide comment on or suggest responses to issues raised.

The consultation focussed on eight topics that were not fully addresses in the original consultation (held between November 2022 and January 2023):

- New Housing and Mixed Use Site Allocations
- New Employment Site Allocations
- Designated Neighbourhood Area Housing Requirements
- Clyst Valley Regional Park
- Town Centre Retail Areas
- Coastal Preservation Area
- Green Wedges
- Sustainability Appraisal

The consultation was hosted on Commonplace (the Council's chosen citizen engagement platform) but people could also comment by sending in emails and letters. An accessible PDF version incorporating the contents of the Commonplace site was made available upon request. We received comments from 1,284 people and organisations through Commonplace channels and 234 letters / emails.

Most people commenting on the plan were unhappy about one or more aspects of the topics covered, though there were some (limited) statements of outright or more typically qualified support.

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2. Introduction

This report provides feedback on responses that have been received on the draft East Devon Local Plan Further Consultation. The additional topics covered by this Further Consultation were consulted upon under Regulation 18 of the plan making regulations [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](#). The consultation starting on 16 May 2024 and ending on 27 June 2024.

In this report we summarise, or in some cases quote directly, what has been said but **do not** seek to respond to points raised. This report, by its very nature, can only give a ‘snap-shot’ overview and whilst every effort has gone into seeking to give a reasoned balance view of matters raised it is stressed that to get a complete understanding of all issues all comments should be read in their entirety.

We would highlight that comments received through the Commonplace engagement software that we used was summarised with the use of the AI (Artificial Intelligence), Claude in August and September 2024. No personal information was disclosed, its use was responsible and lawful and complies with data protection and copyright legislation. Officers have reviewed the AI outputs and the Council declares responsibility for the factual accuracy of the content.

In addition, we received a significant number of responses by email and letter. These have all been read and where relevant, key points have been added to and reflected in the summaries provided. It should be noted that the “number of responses” referred to at the start of each question only refers to those received on commonplace. It was considered too challenging and time consuming to add all the responses received offline into commonplace.

3. The approach to consultation

The consultation covered 8 additional topics which were felt to have not been fully addressed in the original (Regulation 18 Draft Plan) consultation, which ran from November 2022 to January 2023:

These were:

- New Housing and Mixed Use Site Allocations
- New Employment Site Allocations
- Designated Neighbourhood Area Housing Requirements
- Clyst Valley Regional Park
- Town Centre Retail Areas
- Coastal Preservation Area
- Green Wedges
- Sustainability Appraisal

As in that consultation, we utilised a consultation platform called commonplace, which is widely utilised across the Country and has been corporately adopted by East Devon District Council.

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

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

Of those respondents who answered the question ‘What is your connection to the area?’, 93.31% said they lived in East Devon with 18.66% stating that they worked in the district; other responses included that the respondent lived nearby or had a family connection to the area.

The majority of respondents who provided details about their age were middle-aged or older, with 80.91% of respondents aged 45 or above; respondents aged 44 or under represented just 19.09% of those who took part in the consultation. A total of 23.33% of respondents did not state their age.

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

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

<https://eastdevonlocalplanspring24.commonplace.is>

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

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/further-draft-local-plan-consultation/>

Responses from the consultation have been considered by officers in the redrafting of the plan for the publication stage, and relevant responses have been included within the committee reports provided to Councillors on policies and sites.

4. General Comments on the plan – not recorded as policy specific

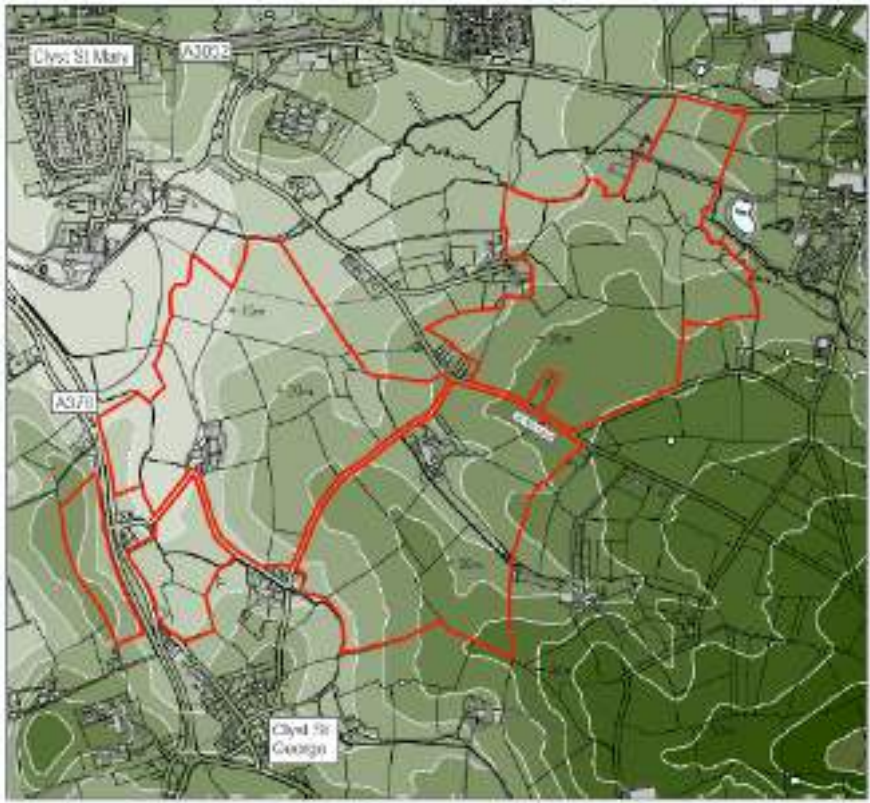
We received a number of comments on the consultation that did not specifically relate directly to consultation material or to policies in the draft plan, matters raised are summarised below.



- ✦ National Highways require necessary transport evidence to assess the impact of allocations on the strategic road network. NH are working with Devon County Council on Greater Exeter transport evidence to address this.
- ✦ Devon and Cornwall Police (ref. 203) feel there should be more detail on the capacity of infrastructure to accommodate new development.
- ✦ Devon and Cornwall Police note that the Levelling-Up and Regeneration Act 2023 states that facilities and equipment for emergency and rescue services are now recognised as “infrastructure” - the Local Plan should recognise that additional police infrastructure from new developments should be funded via developer contributions.
- ✦ Historic England wish to see the Historic Environment Site Assessment that assesses the potential impact of site allocation proposals on heritage assets and their settings.
- ✦ NHS Integrated Care Board
 - Note that East Devon residents in the west use GP surgeries within Exeter City: Pinhoe, Hill Barton, and Topsham – all of which are over capacity.
 - NHS Devon Integrated Care Board (ICB) state there are 14 main GP Practices plus 12 branch surgeries in the areas identified as being suitable for new developments. Nine GP practices are over capacity, eight of which are in the west of East Devon whilst 15 surgeries that have capacity are in the north and east of the district.
 - State the Site Selection reports should highlight sites where there is insufficient primary care capacity, which will require developer funding to mitigate.
 - State the plans for development close to Exeter are not sustainable from a health perspective due to a lack of primary healthcare capacity.
 - State that GP surgeries at Exmouth, Broadclyst, Lympstone, and Woodbury are over capacity.
- ✦ The marine management organisation provided general advice for plan making that was not specific to any particular proposal.
- ✦ Agents representing a variety of the landowners/developers submitted a submissions discussing the merits of their respective sites which were not explicitly included within this consultation.
- ✦ A number of people took issue with the designation of certain settlements within the various tiers of the settlement hierarchy, either arguing they were too high or too low.
- ✦ Natural England

- For each site allocation with potential to adversely affect an internationally protected site (SAC, SPA or Ramsar), a national site (SSSI and NNR), a local site (LNR or CWS), a priority habitat or a protected species, Natural England advises that an assessment of the likely impacts is undertaken, commensurate with the value of the site.
- Where a site allocation is progressed and is likely to affect a wildlife site, habitat or species the policy/proposal should set out the required mitigation measures or, as a last resort, compensatory measures to be secured to address those adverse impacts.
- Local Planning authorities should use Planning Practice Guidance and Natural England's Standing Advice to assess whether a site allocation is likely to harm or disturb a protected species.
- Where the allocation of B&MV agricultural land cannot be avoided, recommend the allocation policy requires planning applications to be accompanied by a sustainable soil handling and management strategy.

5. Submission of new sites

There were a number of sites submitted during the consultation that had not yet been considered in the local plan process. These are summarised below and some of these have been considered in the wash-up session as they met the selection criteria.

Response	Map
<p>Ref 114 – Agent representation promoted a new site for allocation in the plan to the south of the A3052, a smaller part of new community site Option 3.</p> <p><i>Note: that the field west of A376, and 2-3 fields on the northern and north eastern edge of the site, are omission sites.</i></p>	 <p>The map, titled 'Site Boundary Plan', shows a rural landscape with green fields and grey roads. A red line outlines a large, irregularly shaped site. The site is located south of the A3052 road. To the north of the site, the road A376 is visible. Two churches are labeled: 'St Mary' in the upper left and 'St George' in the lower center. The site boundary follows the contours of the land and roads, enclosing several fields and a small building.</p>

<p>Ref. 128 submits a large area of land around the north of Clyst St Mary.</p> <p>This has been considered in the emerging Local Plan as sites Sowt_01 and 02 (both rejected), with the remaining area now submitted within an area of high flood risk (flood zone 3) so will not be considered further.</p>	 <p>The map shows the Clyst Valley area with various flood zones. A large area to the north of Bishop's Clyst is shaded in light red, indicating a high flood risk area (Flood Zone 3). The map includes labels for 'Clyst Valley', 'Bishop's Clyst', 'Newhouse Farm', 'Brockwell's Farm', and 'Mill Down'. A green line representing the Clyst River is visible on the left side. A legend in the bottom right corner identifies the map as 'Land at Clyst St Mar' and includes a disclaimer: 'This plan is certified for the convenience of the purchaser only. Its accuracy is not guaranteed and it is expressly excluded from any contract.' A north arrow and scale are also present.</p>
<p>Ref. 131 submits southern part of North of Topsham Draft LP preferred allocation (Strategic Policy 17), for a total of 446 dwellings.</p> <p><i>Note only the middle field is an omission site.</i></p>	 <p>An aerial photograph of a residential development site. The site is outlined in red and divided into several plots. A large central area is shaded in yellow, and a smaller area to the right is shaded in orange. The surrounding area shows fields, trees, and some buildings. A road is visible on the left side of the site.</p>

Ref. 167 submitted land at Kings Road, Hale Close, Honiton, for 136 dwellings on behalf of the landowners.

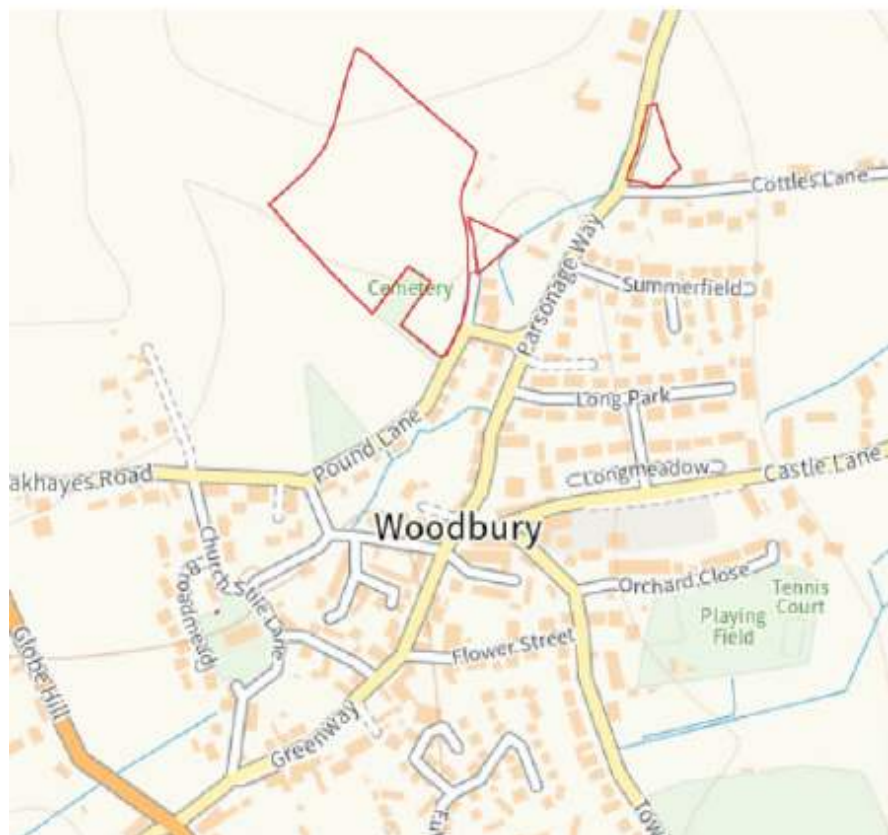


Ref. 226 submits land on the north west edge of Chardstock.



Ref. 226 submits land on the north west edge of Woodbury.

Note this site entirely overlaps with Wood_15, 19. Partial overlap with Wood_14, but this new site (Wood_47) is a larger site that extends up to the field boundary. 2.17 ha of Wood_47 does not overlap existing sites (1.96 ha net developable area)

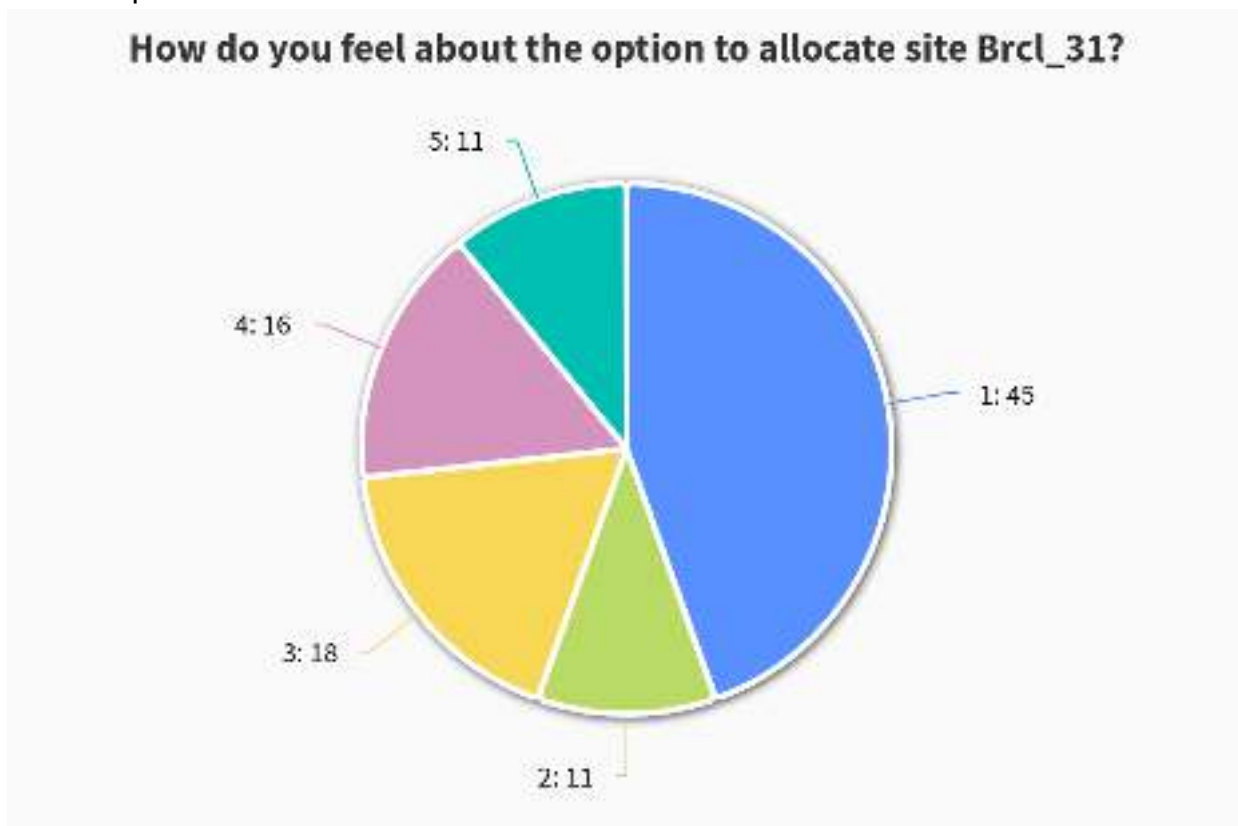


6. New housing and mixed-use site allocations

In the consultation we highlighted a number of additional sites that had been submitted to the Council that could potentially form allocations of land for development. The sites we consulted on are highlighted in this section of the report.

Brcl_31 – Land at Mosshayne Lane

Total responses: 101



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the potential allocation of site Brcl_31 express a wide range of concerns and perspectives. While some support the site's development, many respondents raise significant issues regarding infrastructure capacity, environmental impacts, and the overall suitability of the location. The most frequently raised points relate to traffic and

congestion, the strain on local services, and the potential loss of valuable green space and wildlife habitats.

Key points raised, in order of frequency:

- Traffic and Congestion Concerns
 - Significant issues with the capacity of the B1000 and surrounding road network
 - Concerns about increased congestion and gridlock, especially in Pinhoe
 - Doubts about the feasibility of the proposed highway access
- Strain on Local Infrastructure and Services
 - Lack of capacity in schools, GP surgeries, and other community facilities
 - Concerns about the ability of existing infrastructure to support an additional 1,000 homes
 - Scepticism about the delivery of promised new facilities
- Environmental and Ecological Impacts
 - Potential for increased flood risk and damage to the local ecosystem
 - Loss of valuable green spaces, hedgerows, and wildlife habitats
 - Concerns about the cumulative impact of development in the area
- Overdevelopment and Lack of Proportionality
 - View that the area has already experienced excessive housing development
 - Concerns about the scale of the proposed site in relation to the local context
 - Suggestions for more balanced growth across East Devon
- Doubts about Deliverability and Developer Accountability
 - Scepticism about the developer's ability to deliver the promised infrastructure and services
 - Calls for stronger accountability and enforcement mechanisms
- Alternative Site Preferences
 - Preference for development in other locations, such as the proposed new town south of Exeter Airport
 - Concerns about the site's proximity to the M1 and the need for noise mitigation
- General Support for the Allocation
 - Acknowledgment of the site's accessibility and potential for development
 - Belief that the site is a better option than some of the other proposed allocations

Statutory organisations summary

Natural England

Recommend to maintain habitat connectivity for wildlife movement

Recommend to protect and enhance PRoW, incorporating it into development without adverse impacts

Seek opportunities to improve links to rights of way network for better access to countryside and coast.

Historic England

Note this large site contains one listed building along with numerous records relating to non-designated heritage. Request it is included in the HESA and advice of County Archaeologist is sought on non-designated heritage assets, with the site allocation policy supported by masterplanning and key design principles.

Environment Agency

State the fluvial and surface water flood risk should be assessed and sequential test considered. The ecology section should refer to the stream and its riparian corridor, which should be protected and enhanced, potentially providing opportunities for biodiversity net gain (BNG).

National Highways

State they own land along the northern edge of this site, which cannot be relied on to facilitate development of this site and potentially has significant adverse implications for its delivery.

Caution against development too close to the strategic road network due to noise and air pollution.

Devon County Council

Strongly advises this site is not allocated due to serious highway concerns arising from a lack of suitable second access and significant capacity issues along the B3171.

If the site is to be allocated, a community building, primary school and 0.8 ha of land to provide 70 extra housing units is included.

The sloping topography means there is potential for the creation of inert material during construction, which should be considered in the layout, design and levels of any development.

if site is allocated, it should incorporate principles of waste reduction and reuse, provide a community building, a new 210 place primary school, 70 extra care housing units, and a care home with specialist dementia care.

Network Rail

Support this allocation but should ensure no adverse impacts on the railway and allow sufficient access for Network Rail operatives. Developing the site offers the opportunity to provide contributions to enhance the railway, such as extending Pinhoe platforms, addressing the level crossing and improving safety at the station.

Believe development will increase the use of Pinhoe level crossing and would like this to be assessed in a future Transport Assessment, with mitigation provided if required.

Noise and vibration from the railway should be considered, with appropriate mitigation provided.

Exeter City Council

Notes site's proximity to Exeter city boundary (east of M5) and its likely function as an urban extension of Exeter.

Emphasises need for significant discussions regarding impact on Exeter's infrastructure and services.

If development relies on Exeter's infrastructure, contributions/CIL will need to be invested in the city for mitigation.

Scale of development presents opportunities for new infrastructure (education, healthcare, transport) that could benefit both communities.

Stresses importance of collaboration for effective management of these considerations.

Development's potential infrastructure needs include: Primary and secondary education, primary healthcare, transport infrastructure, other community services

South West Water

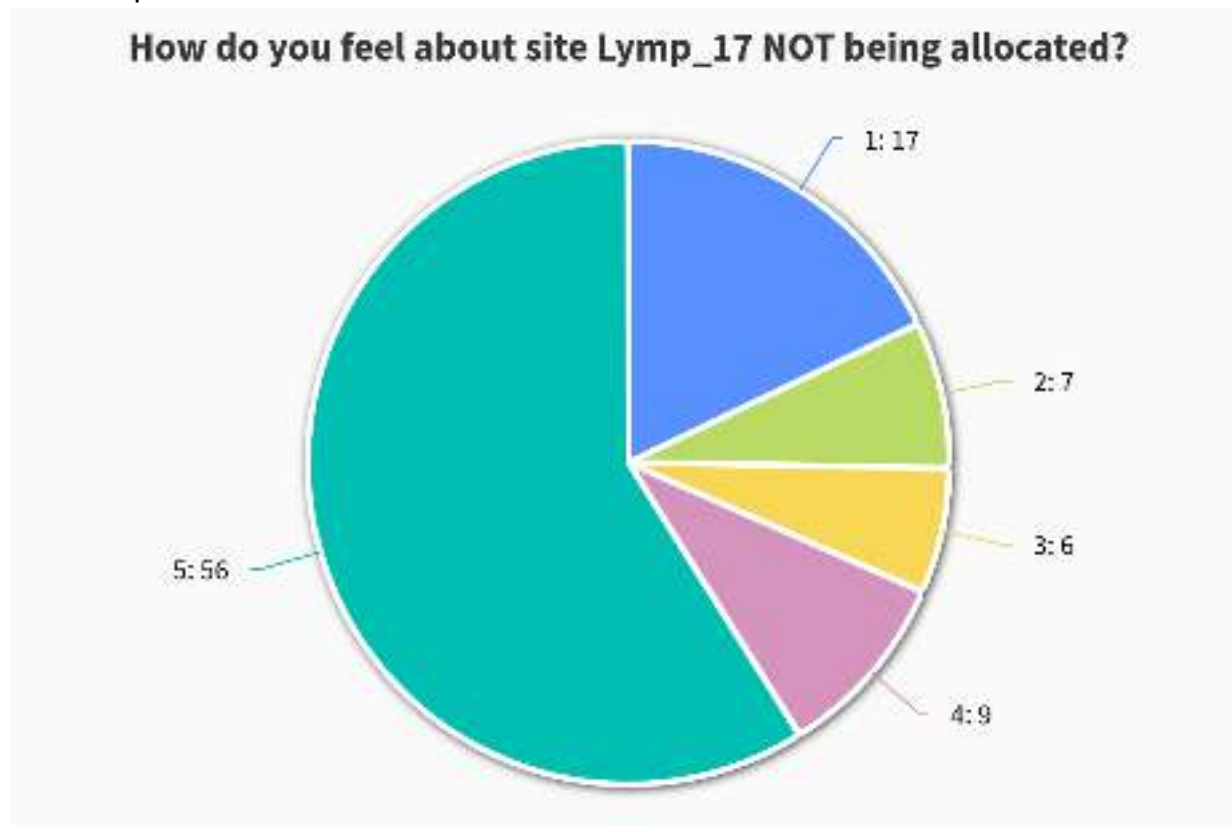
Waste Water Treatment Infrastructure - Investigating the need for investment at Countess Wear STW to treat growth in the catchment, including the building of a new treatment works to free up capacity at the works.

Waste Water network / Sewer Infrastructure -This site would increase the pressure on the network causing the risk of external flooding and possible pollution events. The overflow at Clyst Honiton SPS exceeds 2040 SWW target and will receive investment by 2040. The overflow at Langaton Lane CSO exceeds 2040 SWW target and will receive investment by 2035.

Water Infrastructure - To connect this development to the water distribution network will require a new water main to the site that will require a crossing of the M5 motorway or railway line which could take up to 24 months to complete.

Lymp_17

Total responses: 95



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about site Lymp_17 not being allocated express broad support for this decision, with many commenters highlighting the site's environmental and access-related constraints. Respondents emphasise the importance of preserving the site's wildlife habitats and mature vegetation, as well as concerns about the limited road infrastructure and its inability to accommodate additional traffic. There is also a clear sentiment that the site is more appropriately located within the Lympstone parish rather than being considered part of Exmouth's allocation.

Key points raised, in order of frequency:

- Environmental and Ecological Concerns
 - Importance of protecting the site's wildlife habitats, including mature trees and unimproved grassland

- Role of the site in providing valuable ecosystem services and supporting biodiversity
- Infrastructure and Access Issues
 - Concerns about the limited road capacity and lack of sustainable transport options
 - Doubts about the feasibility of accessing the site from the constrained Hulham Road
- Location and Boundary Delineation
 - Disagreement with the site being considered part of Exmouth's allocation, as it is located within the Lypstone parish
 - Importance of maintaining clear boundaries between settlements
- Overdevelopment Concerns
 - View that the Exmouth area has already experienced excessive housing development
 - Calls for concentrating new development within existing towns and urban areas
- General Support for the Non-Allocation Decision
 - Approval of the decision not to allocate the site for development
- Potential Impacts on Quality of Life
 - Worries about the site's development exacerbating existing infrastructure and service issues in Exmouth

Statutory organisations summary

Historic England

Note this large site contains one listed building along with numerous records relating to non-designated heritage. Request it is included in the HESA and advice of County Archaeologist is sought on non-designated heritage assets, with the site allocation policy supported by masterplanning and key design principles.

Devon County Council

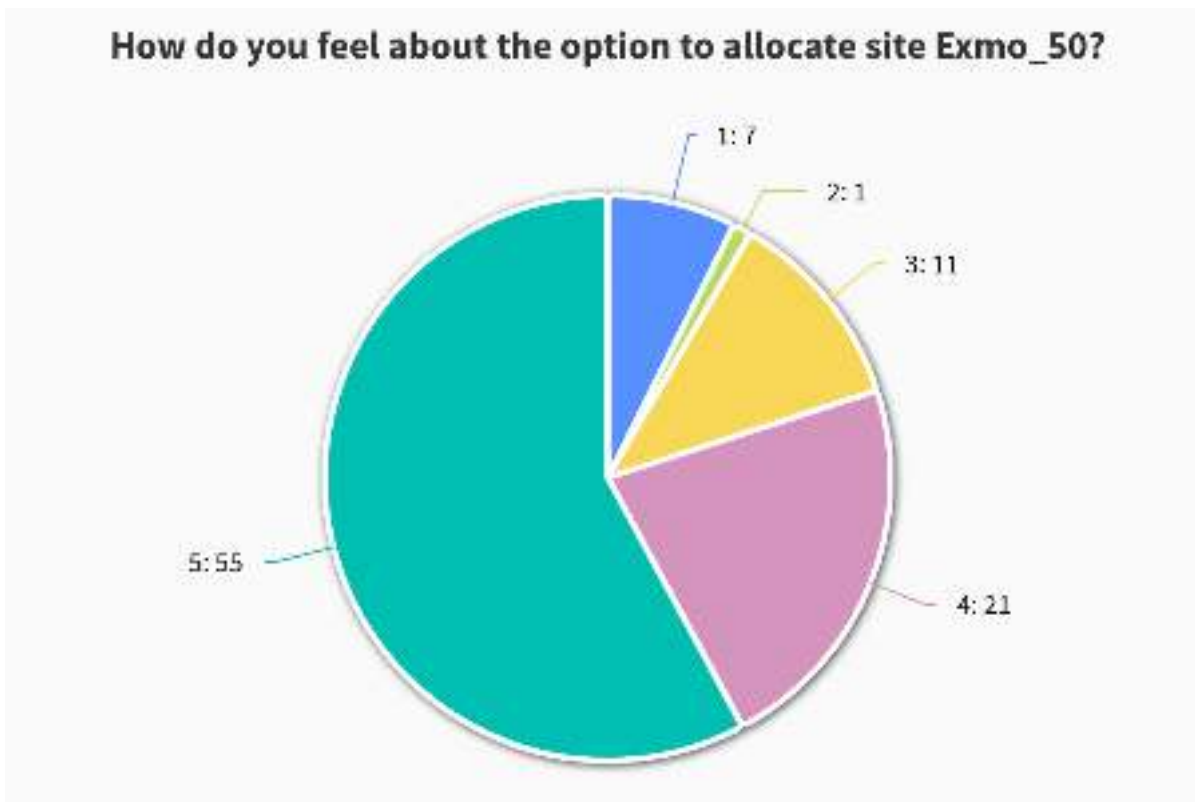
Agree there no guarantee of achieving access through the narrow private road no to Marley Road and this would not be suitable.

Concerns around limited primary capacity in Lypstone and also require secondary school contributions.

State the slightly sloping topography means there is potential for the creation of inert material during construction, which should be considered in the layout, design and levels of any development.

Exmo_50

Total responses: 95



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Exmo_50 (the disused police station in Exmouth) show strong support for redevelopment, with a focus on housing. Most respondents view this as a positive use of a brownfield site within the town centre. However, there are concerns about infrastructure, especially sewage systems, and the type of housing to be provided. Many emphasise the need for affordable or social housing, and stress the importance of sensitive design given the site's location near historic buildings.

Key points raised, in order of frequency:

- Support for brownfield development

- Preference for using brownfield sites over greenfield
 - Seen as sustainable and efficient use of urban land
- ☐ Housing type and affordability
 - Strong emphasis on need for affordable or social housing
 - Some calls for housing suitable for younger generations
- ☐ Design considerations
 - Need for sensitive development respecting nearby historic buildings
 - Current police station described as an "eyesore" by some
- ☐ Infrastructure concerns
 - Sewage system capacity issues mentioned frequently
 - Road network and other infrastructure (schools, healthcare) also noted
- ☐ Location benefits
 - Proximity to town centre and facilities viewed positively
 - Seen as more sustainable than rural development options
- ☐ Alternative uses suggested
 - Some preference for retaining police presence or station
 - Suggestion for car park use
- ☐ General support for redevelopment
 - Site viewed as currently underutilised or run-down
 - Redevelopment seen as part of town improvement
- ☐ Concerns about overdevelopment
 - Some worry about impact on existing residents
 - Calls for infrastructure improvements before further development
- ☐ Environmental considerations
 - Mentions of need for sustainable features (solar panels, grey water storage)
 - Preservation of countryside by developing in town
- ☐☐ Scale and mix of development
 - Some comments on need for appropriate scale
 - Calls for varied housing types

Statutory organisations summary

Historic England

Note the site is located within Exmouth Conservation Area and there are numerous listed buildings around the site, so it should be included in the HESA and policy containing design criteria and recommendations for mitigation and enhancement.

Environment Agency

On-site surface water flood risk needs to be assessed, and redevelopment should manage surface water through SuDS to remove flows from the combined network and reduce risks to the environment.

Devon County Council

Good access and sustainable travel options.

There is spare primary school capacity but contributions towards secondary provision will be required.

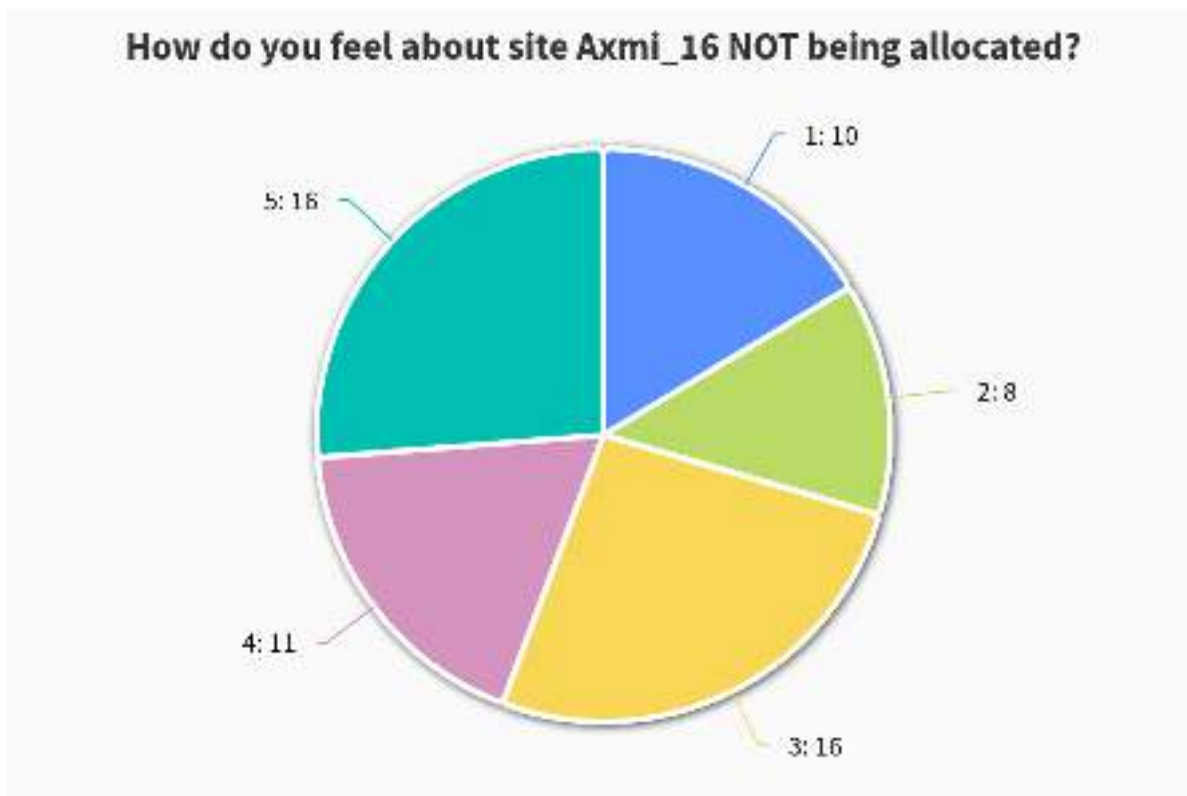
The existing buildings on site means there is potential for the creation of inert material during construction, which should be considered in the layout, design and levels of any development.

NHS Integrated Care Board

There is a lack of primary care infrastructure capacity at Exmouth, so developer contributions are required to mitigate the impact of development.

Axmi_16

Total responses: 61



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about site Axmi_16 not being allocated express a range of perspectives. While some commenters support the non-allocation decision, citing concerns about infrastructure capacity and the need to preserve commercial uses in the town centre, others argue that the site's brownfield status makes it suitable for residential redevelopment.

There are also calls for a balanced approach that considers the wider needs of the growing Axminster community.

Key points raised, in order of frequency:

- Infrastructure and Service Capacity Concerns
 - Doubts about the ability of Axminster's infrastructure, including roads, schools, and public transport, to support additional housing development
 - Worries that the town has already reached a saturation point for new housing
- Importance of Retaining Commercial Uses
 - Views that the site should remain in commercial use to support the town centre and local amenities
 - Concerns about the loss of important facilities like the Co-op store
- Support for Residential Redevelopment of Brownfield Sites
 - Belief that brownfield sites like Axmi_□□ are suitable for housing development
 - Potential for the site to provide much-needed affordable housing
- Calls for a Balanced Approach
 - Acknowledgment of the need to consider the wider benefits and impacts of development allocations
 - Suggestions that Axminster has already experienced a high level of housing growth

Statutory organisations summary

Natural England

The SEA correctly states that all Axminster sites fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.

Environment Agency

All allocations at Axminster should include policy wording to demonstrate nutrient neutrality.

Devon County Council

The site already has a high established trip generation from its current use, with good road access and sustainable travel options.

There may be archaeology potential, and design should recognise the sensitive historic environment as a 'gateway' site.

Primary and secondary school contributions would be required, noting the new primary school in the eastern urban extension is not currently considered deliverable.

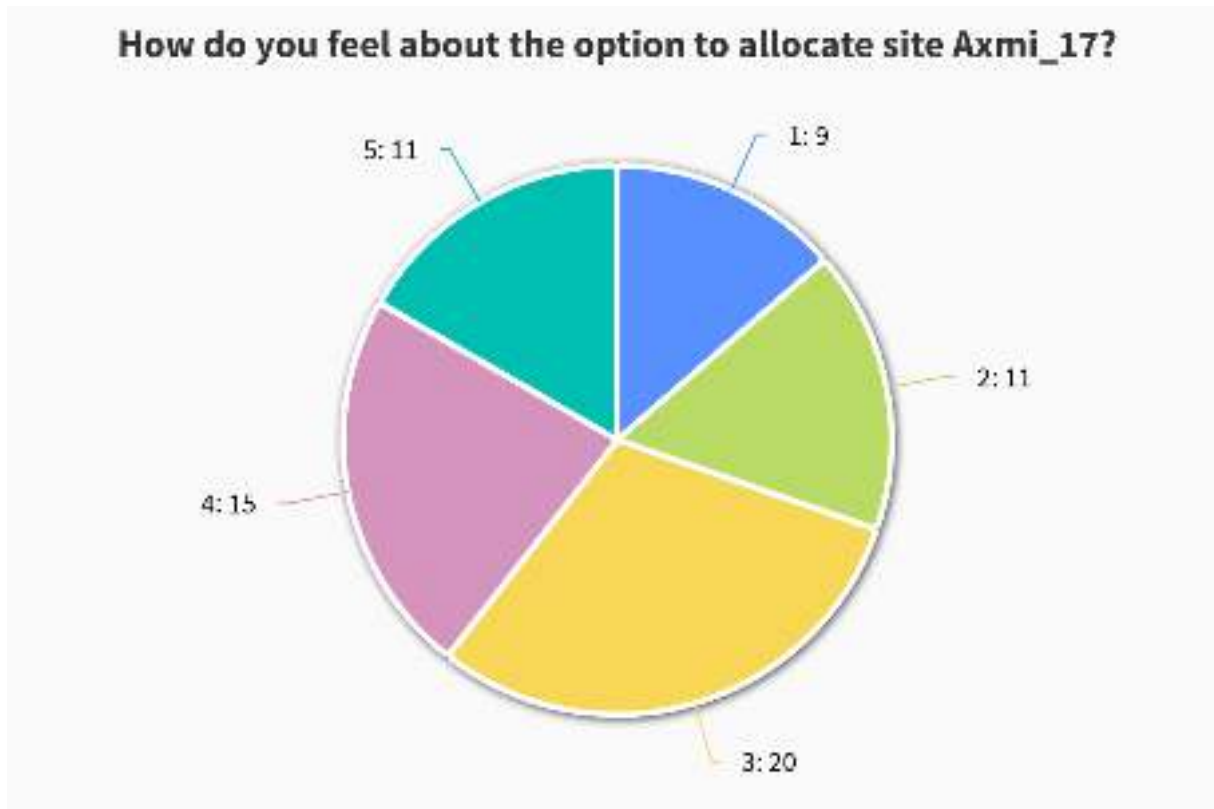
Existing buildings on-site means there is potential for the creation of inert material during construction, which should be considered in the layout, design and levels of any development.

NHS Integrated Care Board

The GP practice has sufficient capacity to accommodate the 64 dwellings proposed.

Axmi_17

Total responses: 66



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Axmi_17 in Axminster reveal mixed opinions, with concerns about environmental impact and infrastructure capacity balanced against recognition of the site's potential for development. Many respondents emphasise the importance of preserving green spaces within urban areas, while others see the site as a suitable location for housing due to its proximity to existing infrastructure. There are also calls for any development to prioritise affordable housing and local needs. Concerns about flooding and the loss of recreational facilities are recurring themes.

Key points raised, in order of frequency:

- Preservation of green spaces and environmental concerns

- Importance of maintaining urban green spaces for biodiversity and flood management
- Concerns about loss of wildlife habitats and environmental impact
- ☐ Infrastructure and town capacity
 - Worries about existing infrastructure's ability to support more development
 - Need for improved facilities (e.g., doctors, dentists) to support growth
- ☐ Support for development with conditions
 - Recognition of the site's potential for housing due to location and access
 - Increase density
- ☐ Calls for development to prioritise affordable housing or local needs Flooding concerns
 - Mentions of the site's propensity to flooding
 - Importance of green spaces as natural flood management
- ☐ Recreational facilities and open spaces
 - Concerns about loss of recreational areas
 - Suggestions to partially develop while maintaining some open space
- ☐ Traffic and accessibility
 - Concerns about increased traffic through town centre
 - Recognition of good road access and proximity to transport links
- ☐ Archaeological considerations
 - Mention of site's archaeological potential and historical significance
- ☐ Alternative development suggestions
 - Proposals to use the site for allotments or tree planting
 - Suggestions to focus on brownfield sites instead
- ☐ Local authority ownership considerations
 - Potential for site to address local housing issues due to council ownership
- ☐☐ Concerns about overdevelopment
 - Perception of Axminster as already experiencing significant development
 - Calls to consider development in other areas

Statutory organisations summary

Natural England

The SEA correctly states that all Axminster sites fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.

Historic England

Recommend seeking the advice of the County Archaeologist on the acceptability of development, given the site formed part of a WWII Military Hospital.

Environment Agency

Note all allocations at Axminster should include policy wording to demonstrate nutrient neutrality.

State a small area of flood risk crosses the site which will need to be assessed, and sequential test considered.

Devon County Council

All allocations at Axminster should include policy wording to demonstrate nutrient neutrality.

The site has good highway access.

The site lies in an area of known high archaeological potential, so any planning application should be informed by archaeological investigations.

Primary and secondary school contributions would be required, noting the new primary school in the eastern urban extension is not currently considered deliverable.

Developing the site could create inert material that should be considered in the layout, design and levels of any development.

NHS Integrated Care Board state

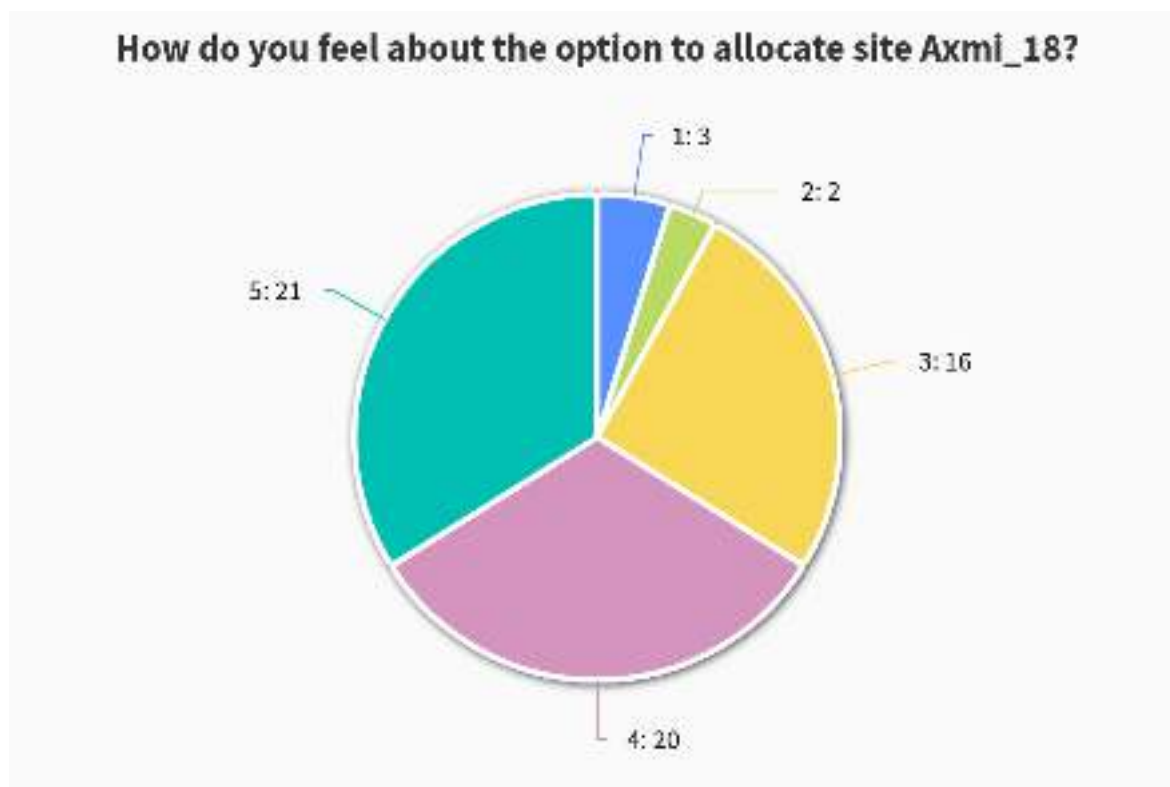
The GP practice has sufficient capacity to accommodate the 64 dwellings proposed.

Somerset Council

No objection but note the potential impact of additional traffic generation to employment areas at Chard because of planned growth at Axminster and the requirement for phosphate mitigation in the River Axe Catchment Area.

Axmi_18

Total responses: 62



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Axmi_18 are mixed, with a slight lean towards support for the allocation. Those in favour view it as a suitable infill development in an existing built-up area, while those against raise concerns about access and the limited scale of development. Some respondents emphasise the need for affordable housing and local resident prioritisation if the site is developed.

Key points raised, in order of frequency:

- Suitable infill development
 - Good location within existing built-up area
 - Preferable to developing greenfield sites
- Concerns about access and infrastructure
 - Poor access to the site
 - Potential increase in vehicle traffic

- ❑ Affordable housing needs
 - Preference for social housing or affordable homes for local residents
- ❑ Limited scale of development
 - Site doesn't provide significant housing or infrastructure benefits
- ❑ Archaeological considerations
 - Former WW2 military hospital site, likely disturbed
- ❑ Design considerations
 - Need for sympathetic design considering impact on neighbouring properties

Statutory organisations summary

Natural England

The SEA correctly states that all Axminster sites fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.

Historic England

Recommend seeking the advice of the County Archaeologist on the acceptability of development, given the site formed part of a WWII Military Hospital.

Devon County Council

State the access route is a slight bottle neck which may not be suitable for a larger development but may be engineered suitable for a smaller scale mixed use site.

The site lies in an area of known high archaeological potential, so any planning application should be informed by archaeological investigations.

DCC state primary and secondary school contributions would be required, noting the new primary school in the eastern urban extension is not currently considered deliverable.

DCC note developing the site could create inert material that should be considered in the layout, design and levels of any development.

NHS Integrated Care Board

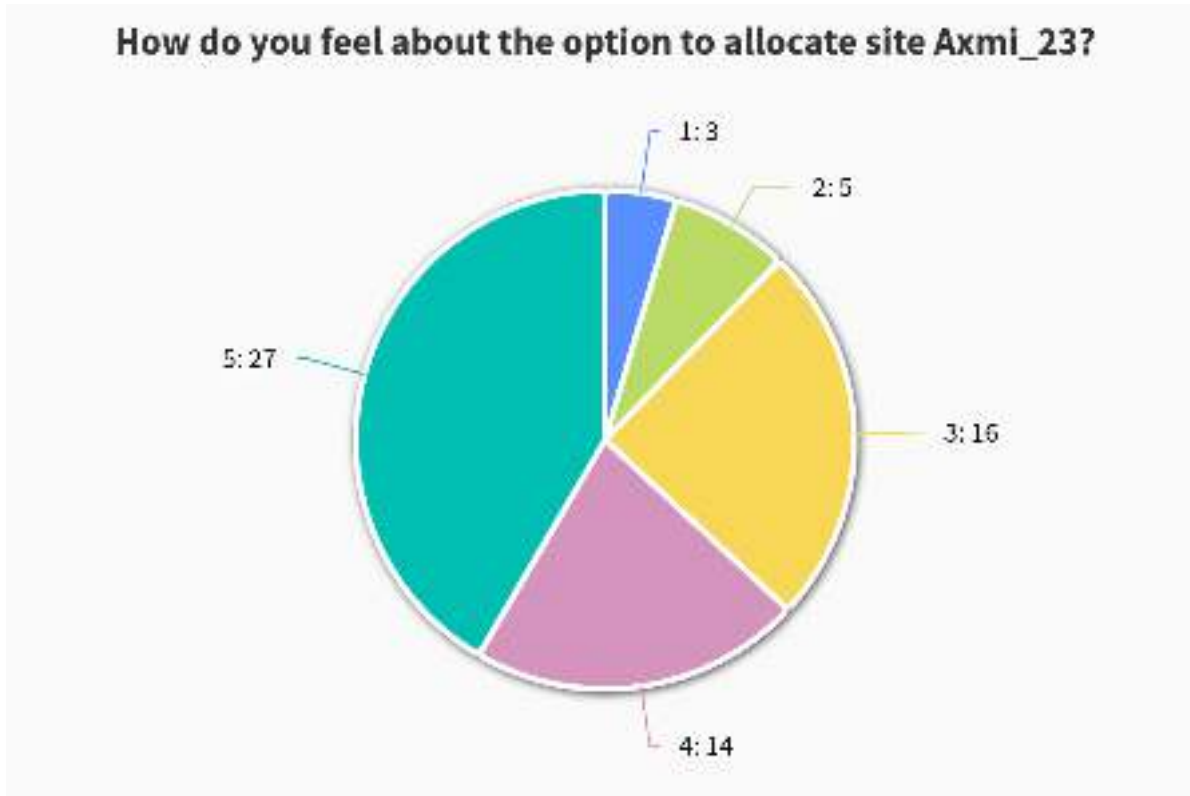
The GP practice has sufficient capacity to accommodate the 64 dwellings proposed.

Somerset Council

No objection but note the potential impact of additional traffic generation to employment areas at Chard because of planned growth at Axminster and the requirement for phosphate mitigation in the River Axe Catchment Area.

Axmi_23

Total responses: 65



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Axmi_23 are generally positive, with most respondents supporting the development of this brownfield site in the heart of Axminster. Many view it as an opportunity to improve the town centre's appearance and make better use of an underutilised space. However, there are some concerns about the impact on local infrastructure and the need for sensitive design given the site's historic location.

Key points raised, in order of frequency:

- Support for brownfield development
 - Preference for developing existing urban sites over rural areas
 - Opportunity to improve an "eyesore" in the town centre
- Mixed-use development potential

- Suggestions for retail, leisure, and housing mix
 - Opportunity for creative town centre regeneration
- Archaeological and historical considerations
 - High potential for archaeological deposits
 - Need for sensitive design and archaeological assessment
- Housing type preferences
 - Suggestions for social housing or warden-controlled accommodation
 - Benefits of central location for elderly and disabled residents
- Design considerations
 - Emphasis on high-quality design due to prominent location
 - Need for sensitivity to historic surroundings
 - Increase density
- Parking and access concerns
 - Suggestions to retain some parking for town centre use
 - Concerns about access to the site
- Alternative development ideas
 - Suggestion for green space and recreational area instead of housing
- Infrastructure concerns
 - Doubts about Axminster's ability to support more housing

Statutory organisations summary

Natural England

The SEA correctly states that all Axminster sites fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.

Historic England

Note the presence of heritage assets (Conservation Area, listed buildings) but do not object provided suitable criteria is included to conserve and enhance heritage assets. However, the vehicular access should be from Lyme Street to the north to avoid impacts on Grade II listed buildings.

Environment Agency

Note an area of surface water flood risk crosses the entrance to the site, which will need to be assessed.

Devon County Council

The site has two possible road connections, the site is large for Axminster centre but sustainable travel options may reduce vehicle trip generation.

The site lies in an area of known high archaeological potential, so any planning application should be informed by archaeological investigations.

State primary and secondary school contributions would be required, noting the new primary school in the eastern urban extension is not currently considered deliverable.

Developing the site could create inert material that should be considered in the layout, design and levels of any development.

NHS Integrated Care Board

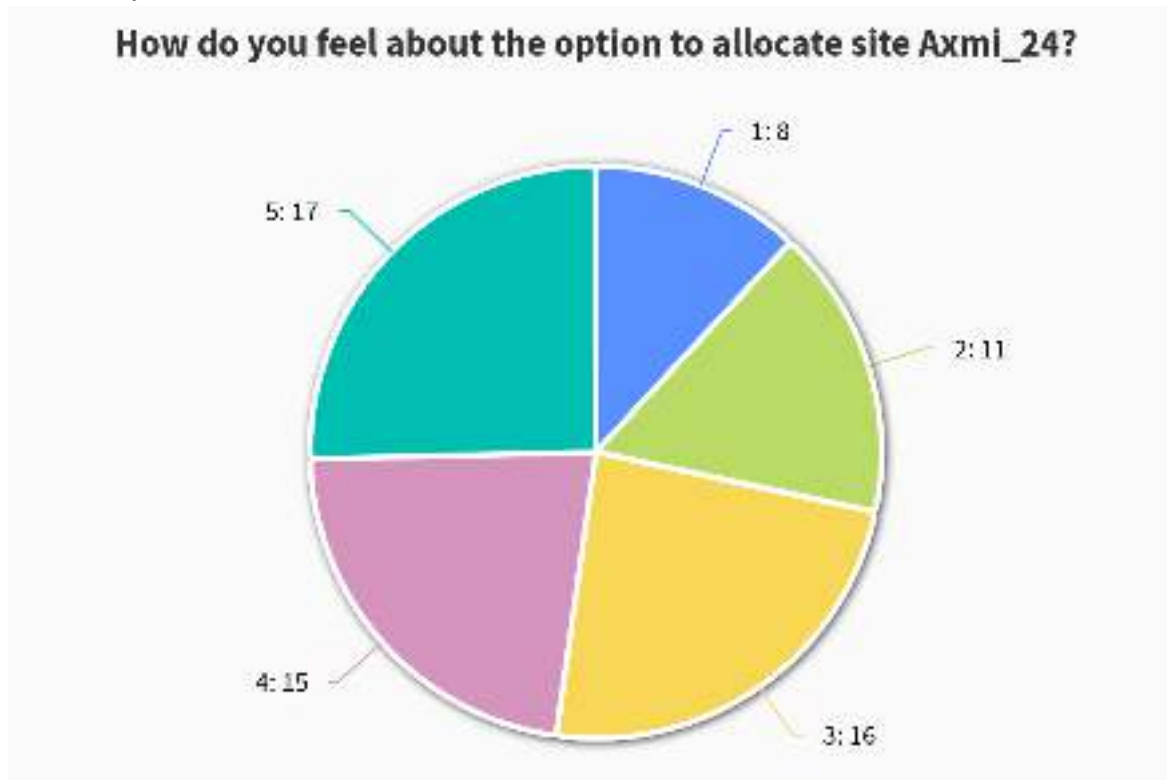
state the GP practice has sufficient capacity to accommodate the 64 dwellings proposed.

Somerset Council

No objection but note the potential impact of additional traffic generation to employment areas at Chard because of planned growth at Axminster and the requirement for phosphate mitigation in the River Axe Catchment Area.

Axmi_24

Total responses: 67



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Axmi_24 are mixed, with significant concerns raised about environmental impact, infrastructure capacity, and flood risk. While some respondents view it as a relatively sustainable option compared to more rural sites, others emphasise the importance of preserving green spaces and protecting the local ecosystem. There are also calls for careful consideration of the overall development strategy for Axminster.

Key points raised, in order of frequency:

- Environmental concerns
 - Loss of valuable green space and biodiversity
 - Proximity to River Axe Special Area of Conservation
 - Impact on local wildlife and ecology

- Flood risk and drainage issues
 - Poor drainage and steep slopes
 - Site located on a flood plain
- Infrastructure concerns
 - Doubts about Axminster's ability to support more housing
 - Need for increased school and GP capacity
 - Traffic and road infrastructure issues
- Relatively sustainable location
 - Good site location with nearby facilities
 - More sustainable than rural sites
 - Increase density
- Agricultural land preservation
 - Concern about impact on nearby farm and food security
- Archaeological considerations
 - Potential for archaeological finds, need for evaluation

Statutory organisations summary

Natural England

The SEA correctly states that all Axminster sites fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.

Site is close to the Blackdown Hills AONB

Environment Agency

The site is partly within flood zone 3, which will need to be assessed, and sequential text considered. Also located in Axminster Critical Drainage Area. The ecology section should mention the stream on the southern boundary, which should be protected and enhanced.

Devon County Council

Some of this site is being safeguarded for the long-term aspiration of Axminster Relief Road, so any development should work with Devon County Council to support/deliver this section of the relief road.

DCC note the site has a sloping topography that could create inert material that should be considered in the layout, design and levels of any development.

DCC state primary and secondary school contributions would be required, noting the new primary school in the eastern urban extension is not currently considered deliverable.

NHS Integrated Care Board

The GP practice has sufficient capacity to accommodate the 64 dwellings proposed.

Somerset Council

No objection but note the potential impact of additional traffic generation to employment areas at Chard because of planned growth at Axminster and the requirement for phosphate mitigation in the River Axe Catchment Area.

South West Water

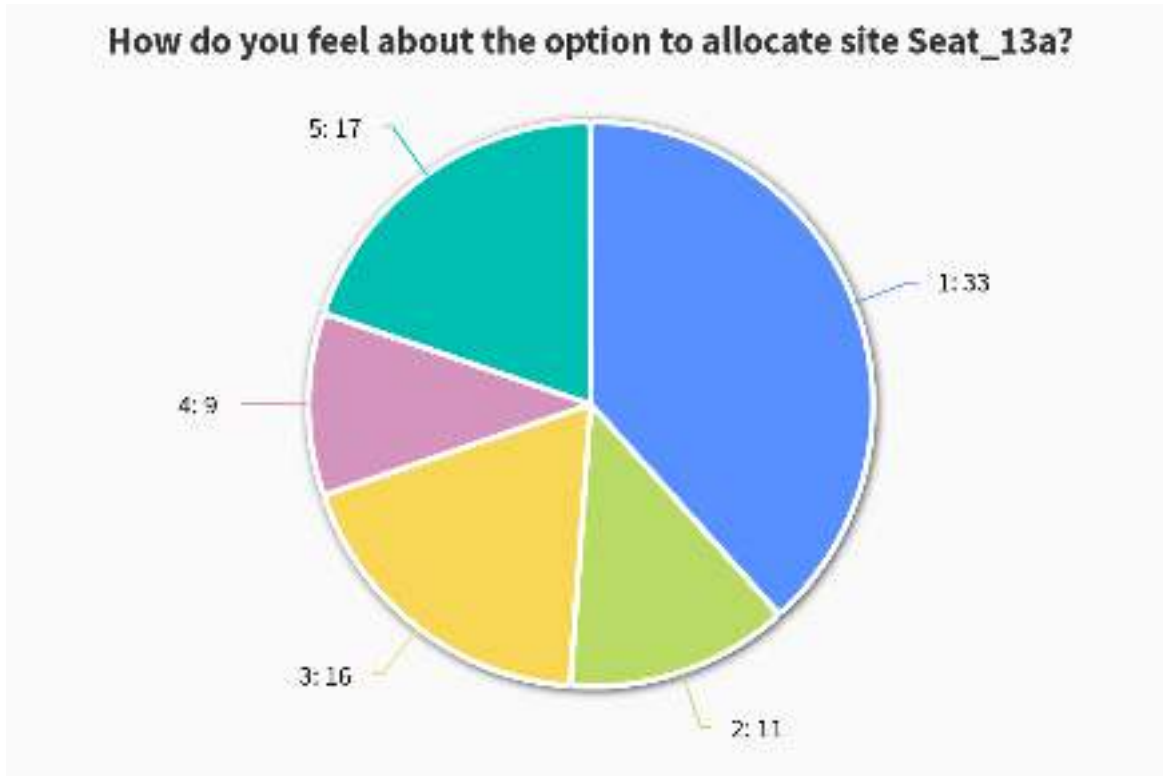
Waste Water Treatment Infrastructure- Not expected to require significant upgrades to the network or treatment process.

Waste Water network / Sewer Infrastructure - Not expected to require significant upgrades to the network or treatment process.

Water Infrastructure - Likely to need upgrades to the water distribution network along Beavor Lane

Seat_13a

Total responses: 86



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the option to allocate site Seat_13a express significant opposition. Many respondents cite concerns about the site's proximity to sensitive environmental and heritage assets, such as the Beer Quarry Caves SAC and a scheduled Roman villa. There are also major worries about the risk of increased flooding, both on the site itself and in the surrounding residential areas.

Commenters highlight the site's location within a designated Green Wedge and the importance of preserving these valuable green spaces, both for environmental and community benefits. The inability of Seaton's existing infrastructure, including roads, schools, and healthcare facilities, to support additional development is another frequently raised issue.

Some respondents suggest that there are more suitable sites available for new housing that would have less impact. A few acknowledge the need for new homes but argue that this particular site is inappropriate due to the various constraints and concerns outlined.

Key points raised, in order of frequency:

- ❑ Environmental and heritage concerns
 - Proximity to Beer Quarry Caves SAC and scheduled Roman villa
 - Potential impact on biodiversity and landscape connectivity
- ❑ Flooding and drainage issues
 - Existing flooding problems in nearby residential areas
 - Concerns about exacerbating flood risk through development
- ❑ Opposition to development within the Green Wedge
 - Importance of preserving the Green Wedge between Seaton and Colyford
- ❑ Infrastructure and capacity concerns
 - Inadequate roads, schools, healthcare, and other services to support new housing
- ❑ Preference for alternative sites or reduced housing allocations
 - Suggestion to focus development on more suitable sites
 - Argument to reduce overall housing targets
- ❑ Specific concerns about site layout and access
 - Impact of new access road through existing residential area
 - Potential loss of landscape features like Devon banks and trees
- ❑ General opposition to the allocation
 - Respondents simply state their objection without providing detailed reasons
- ❑ Potential benefits of development
 - Acknowledgement of need for new homes, but concerns about this site
- ❑ Criticism of the consultation process
 - Perception of lack of consideration for smaller development sites

Statutory organisations summary

Natural England

Site is close to the E Devon AONB and E Devon Heritage Coast.

Historic England

The site is adjacent to a Scheduled Monument – should consider the impact of development on archaeology and its setting and retention of a green open buffer rather than encircling the site in development.

At this stage, in the absence of further information in a HESA, this site is unlikely to be suitable for allocation. The HESA should be informed by archaeological advice from the County Archaeologist.

Devon County Council

The note the site would be accessed from the housing estate roads, of which there are a few options, but there are fewer sustainable travel options for Seaton.

This site lies in an area of known high archaeological potential (adjacent to a late Iron Age farmstead and Roman villa) so should not be allocated until comments have been received from Historic England and geophysical survey and field evaluation have been undertaken.

The site has a sloping topography that could create inert material that should be considered in the layout, design and levels of any development.

Seaton Primary School can facilitate the proposed level of development, but contributions toward secondary education would be required.

NHS Integrated Care Board

The GP practice has sufficient capacity to accommodate the 64 dwellings proposed.

South West Water

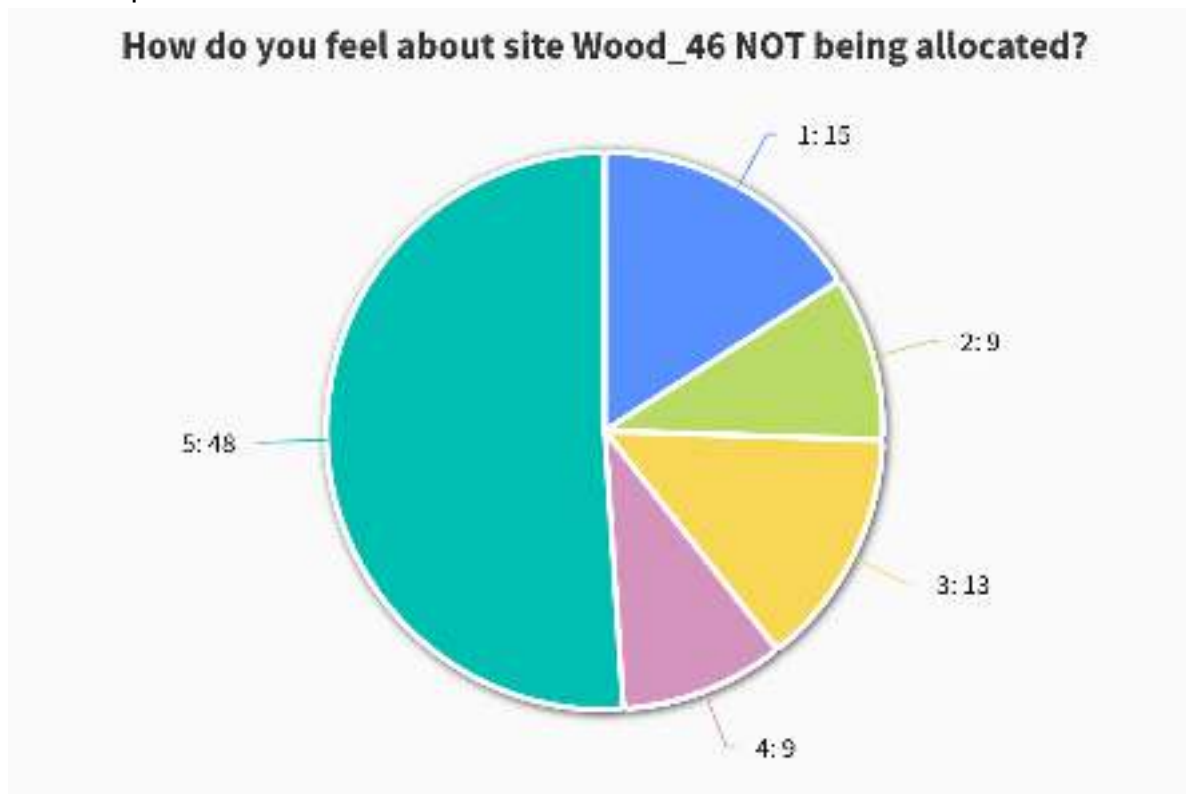
Waste Water Treatment Infrastructure- Not expected to require significant upgrades to the network or treatment process.

Waste Water network / Sewer Infrastructure - Not expected to require significant upgrades to the network or treatment process.

Water Infrastructure - Likely to need upgrades to the water distribution network.

Wood_46

Total responses: 94



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about site Wood_46 not being allocated predominantly express support for this decision. Many respondents cite concerns about infrastructure, particularly regarding road access, traffic, and local services like schools and healthcare. There are also significant worries about the impact on the landscape, loss of green space, and potential flood risks. Some comments highlight the importance of preserving the village character of Woodbury and the need to focus development in more suitable areas. However, a small number of responses indicate support for housing development in the area.

Key points raised, in order of frequency:

- Infrastructure concerns
 - Inadequate road access and traffic issues
 - Pressure on local services (schools, healthcare)

- Sewerage system capacity problems
- ☐ Landscape and environmental impact
 - Loss of green space and farmland
 - Impact on Devon's natural beauty
 - Concerns about biodiversity and habitat loss
- ☐ Flood risk and drainage issues
 - Site partially on a flood plain
 - Importance of green spaces for flood mitigation
- ☐ Preserving village character
 - Concerns about urbanisation and village expansion
 - Desire to maintain Woodbury's rural nature
- ☐ Support for the decision not to allocate
 - Agreement with the site assessment
 - Preference for other, more suitable sites
- ☐ Traffic concerns
 - Narrow roads and congestion issues
 - Overuse of roads to Exmouth
- ☐ Detachment from village centre
 - Lack of safe pedestrian access to village amenities
 - Isolation from existing residential areas
- ☐ Need for housing development
 - Some support for new housing in the area
 - Recognition of potential for suitable plots
- ☐ Alternative development suggestions
 - Proposals for apartment blocks instead of houses
 - Suggestions to focus development in other areas of East Devon
- ☐☐ Concerns about overdevelopment
 - Too much development in this part of East Devon
 - Cumulative impact of multiple developments

Statutory organisations summary

Devon County Council

State contribution/works would be required to review accessibility to the site, over Broadway Bridge and into the village centre, but generally low traffic speed and local facilities and services help to mitigate vehicle trip generation.

The site lies in an area of known high archaeological potential, so any planning application should be informed by archaeological investigations.

The site could create inert material that should be considered in the layout, design and levels of any development.

Woodbury C of E primary school can facilitate the proposed level of development, but contributions would be required towards secondary education.

Environment Agency

Support rejection of this site due to its proximity to watercourses.

South West Water

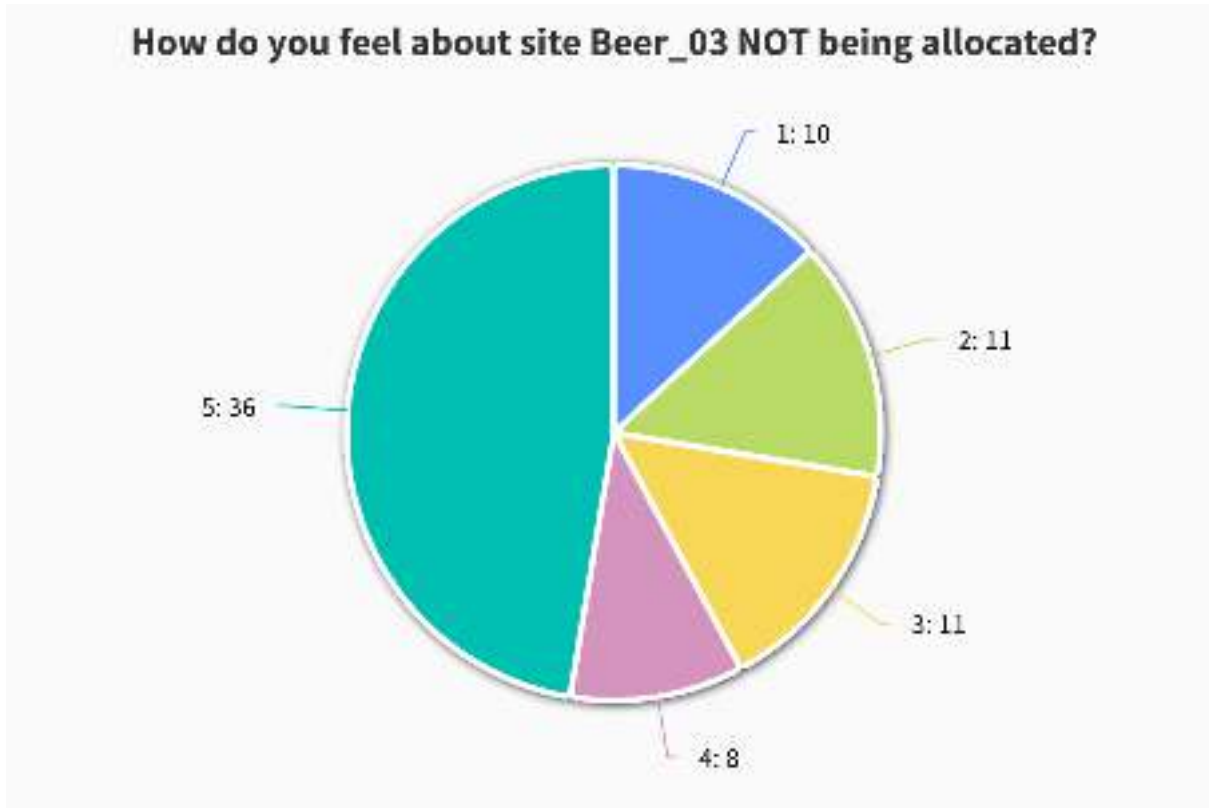
Waste Water Treatment Infrastructure- Not expected to require significant upgrades to the network or treatment process.

Waste Water network / Sewer Infrastructure - There is already local concern about the spill performance from the overflow at the treatment works and the foul flows from this site would cause a slight further deterioration.

Water Infrastructure - Not expected to require significant upgrades to the water distribution network.

Beer_03

Total responses: 76



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about site Beer_03 not being allocated express general support for this decision. Many respondents cite concerns about the potential impact on the local landscape, heritage assets, ecology, and infrastructure capacity. There are worries that development on this site would be intrusive and exacerbate existing issues like flooding. Some commenters emphasise the need to protect agricultural land and green spaces, especially in light of climate change. A few respondents simply state their approval of the decision without providing additional details.

Key points raised, in order of frequency:

- Concerns about landscape, heritage, and ecological impacts
 - Site's proximity to sensitive natural and historic assets

- Intrusion into the surrounding countryside
- Infrastructure and flooding issues
 - Inadequate roads, schools, and utilities to support development
 - Exacerbation of existing flooding problems in Beer
- Preference for preserving green space and agricultural land
 - Importance of retaining natural areas for environmental and climate resilience
 - Need to protect farmland for future food security
- General support for not allocating the site
 - Respondents simply express approval without further explanation

Statutory organisations summary

Devon County Council

There is good visibility access on Quarry Lane with a potential secondary/emergency access onto Bovey Lane. There are several facilities with pavement connections, to help mitigate vehicle trip generation.

Historic Environment Records of prehistoric activity surrounding the site, which should be subject to archaeological assessment prior to development.

The site is located within a Mineral Consultation Area associated with Beer Quarry, although the quarry is over 100m away so no objection.

The sloping nature of the site means potential for the creation of inert material which should be considered in the layout, design and levels of development.

Beer C of E primary school has capacity to facilitate the proposed level of development, but contributions toward secondary education is required.

South West Water

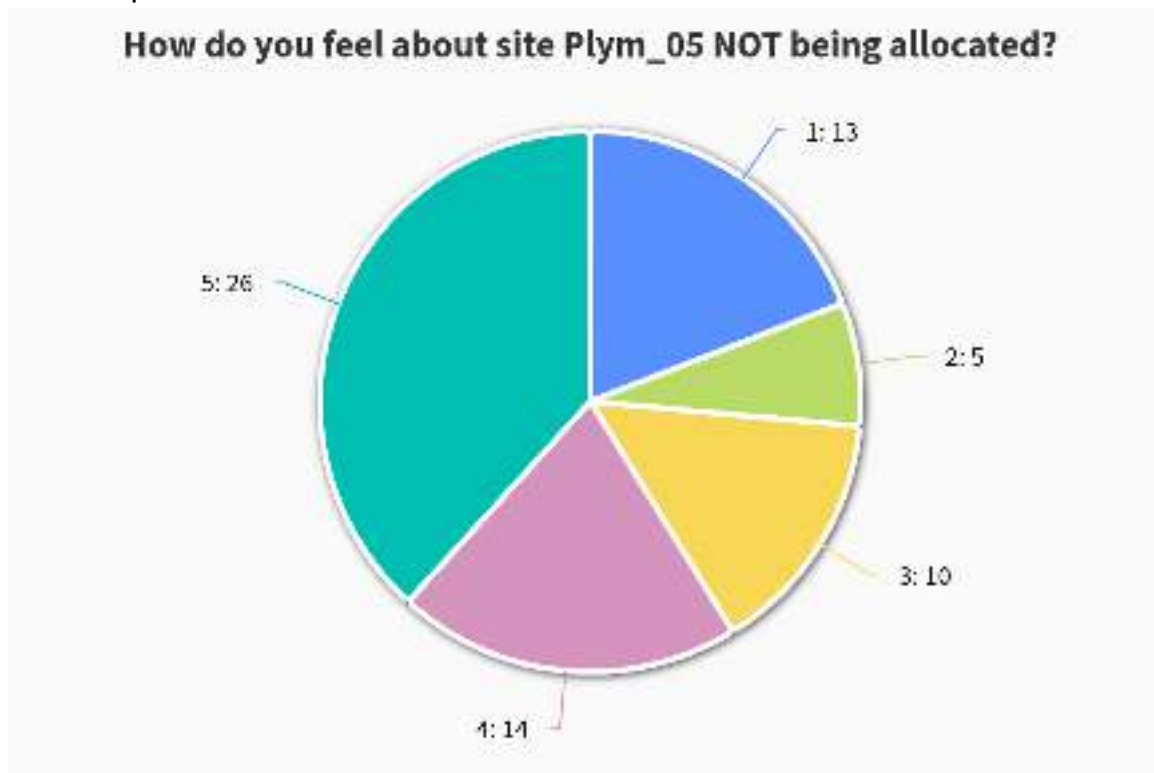
Waste Water Treatment Infrastructure- Not expected to require significant upgrades to the network or treatment process.

Waste Water network / Sewer Infrastructure - Not expected to require significant upgrades to the network or treatment process.

Water Infrastructure - Likely to need upgrades to the water distribution network.

Plym_05

Total responses: 68



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about site Plym_05 not being allocated are mixed, with a slight lean towards supporting the decision not to allocate. Many respondents express concerns about the impact on the village's character, infrastructure, and green spaces. However, some see potential benefits in modest development to support local amenities and housing needs. There are also calls for more detailed consideration of design and density if development were to proceed.

Key points raised, in order of frequency:

- Environmental and landscape concerns
 - Importance of retaining greenfield areas and biodiversity
 - Potential loss of land for food production
- Infrastructure limitations
 - Lack of road and school infrastructure to support new development

- Insufficient services in the area for additional housing
- Village character and scale
 - Concerns about the proposed development being too large for the village
 - Need for appropriate density and design if developed
- Support for non-allocation
 - Agreement with the decision not to allocate the site
- Potential benefits of development
 - Possibility of supporting local amenities like the pub
 - Helping to meet housing targets
- Heritage considerations
 - Archaeological potential and proximity to Grade II* Listed Plymtree Manor
 - Differing views on impact on the manor's setting
- Alternative development suggestions
 - Proposals for low-rise apartments instead of houses
 - Preference for developments targeted at local young people and the elderly
- Conditional support for development
 - Suggestion for smaller-scale development of 10-15 units

Statutory organisations summary

Devon County Council

The site can achieve good visibility access, and local facilities will help mitigate some of the vehicular trip generation.

There is a less than daily bus service, so likely to be largely dependent on car-based journeys.

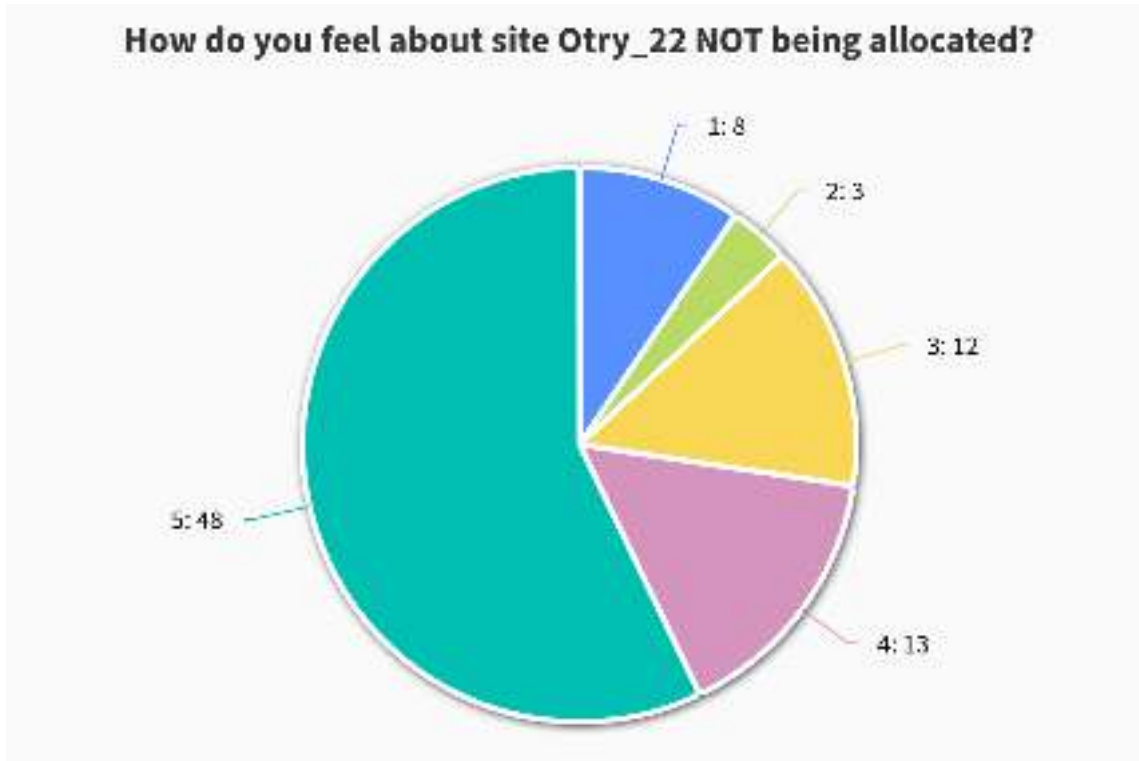
Note a possible ring ditch to the south that should be investigated through a planning application.

The slightly sloping topography means some inert material may be created, which should be considered in the layout, design, and levels of development.

Plymtree primary school could facilitate the proposed level of development, but contributions towards secondary education would be required.

Otry_22

Total responses: 84



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about site Otry_22 not being allocated are largely supportive of the decision, with most respondents expressing concerns about the site's suitability for development. Key issues raised include environmental impact, infrastructure limitations, and the site's location in relation to the village. However, a few respondents see potential for limited development or suggest alternative approaches.

Key points raised, in order of frequency:

- Environmental and landscape concerns
 - Potential impact on the River Otter catchment and pollution
 - Loss of green space and impact on biodiversity
 - Negative effects on the National Landscape
- Infrastructure limitations
 - Lack of road and school infrastructure to support new development

- Concerns about overcrowding and insufficient services
- Unsuitable location
 - Site described as inappropriate for development
 - Concerns about intrusion into the countryside
 - Issues with site elevation and visibility
- Support for non-allocation
 - Agreement with the decision not to allocate the site
- Village character and scale
 - Concerns about negative impact on the small village
 - Preference for small-scale development if any
- Flooding concerns
 - Increased run-off into the River Otter
 - Site prone to flooding
- School relocation issues
 - Disagreement with stated school catchment data
 - Concerns about potential school relocation
- Need for more information
 - Lack of Water Cycle Study

Statutory organisations summary

Devon County Council

There is good access onto the main through road at Tipton St John, and contributions to relocate the school within the village would help reduce vehicular trips.

There will no anticipated impact on archaeological interest.

The sloping topography means some inert material may be created, which should be considered in the layout, design, and levels of development.

There is capacity at Tipton St John primary school, it is planned to be rebuilt due to ongoing flood risk on site, but a new school site has not yet been agreed. The King's School has limited capacity and are not willing to expand without the provision of a new school site.

General Comments

Do you have any other comments on the New Housing and Mixed Use Site Allocations?

The responses to the question about new housing and mixed-use site allocations reveal a range of concerns and suggestions from residents. The most prevalent issues include worries about infrastructure capacity, environmental impact, and the scale of development in certain areas. Many respondents emphasise the need for affordable housing and better planning to preserve local character. There is also significant criticism of the overall housing allocation process and calls for more sustainable development practices.

Key points raised, in order of frequency:

- Infrastructure concerns
 - Inadequate capacity of roads, schools, healthcare facilities, and utilities
 - Need for improved sewage systems and concerns about flooding
- Environmental and ecological impact
 - Concerns about building on green spaces and impact on biodiversity
 - Need for more sustainable development practices
- Affordable housing needs
 - Calls for more affordable homes for local people and families
 - Suggestions for different types of housing ownership and rental options
- Preservation of local character
 - Concerns about overdevelopment in villages and small towns
 - Need for development sensitive to local architectural styles
- Criticism of housing allocation process
 - Disagreement with government housing targets
 - Calls for EDDC to contest allocated housing numbers
- Focus on brownfield and infill development
 - Preference for using already developed areas before green spaces
- Importance of sustainability in new builds
 - Suggestions for incorporating renewable energy and water-saving measures
- Concerns about specific local developments
 - Opposition to large-scale developments in particular areas
- Need for better consultation and planning
 - Calls for more widely advertised consultations
 - Requests for more holistic planning approaches
- Economic considerations
 - Concerns about job opportunities for new residents
 - Impact on tourism and local businesses

Statutory consultee and technical responses

Devon County Council

Highways state that Combe Bank has potential for good access to Tipton St John, but relocating the 30mph speed limit requires a Traffic Regulation Order, which falls outside the planning process. Contributions to relocate the village school could help reduce vehicular traffic.

Historic Environment state that there is no anticipated impact on heritage assets with archaeological interest, and the Historic Environment Team has no comments on the proposed allocation area.

Minerals and Waste state that the site is not within a Mineral Safeguarding Area (MSA) or Waste Consultation Zone (WCZ), so there are no objections. However, due to the sloping topography and existing buildings, there is potential for inert material creation during demolition and construction. The planning authority recommends considering waste reduction

and reuse principles, including on-site reuse of materials, to minimise waste generation and off-site disposal.

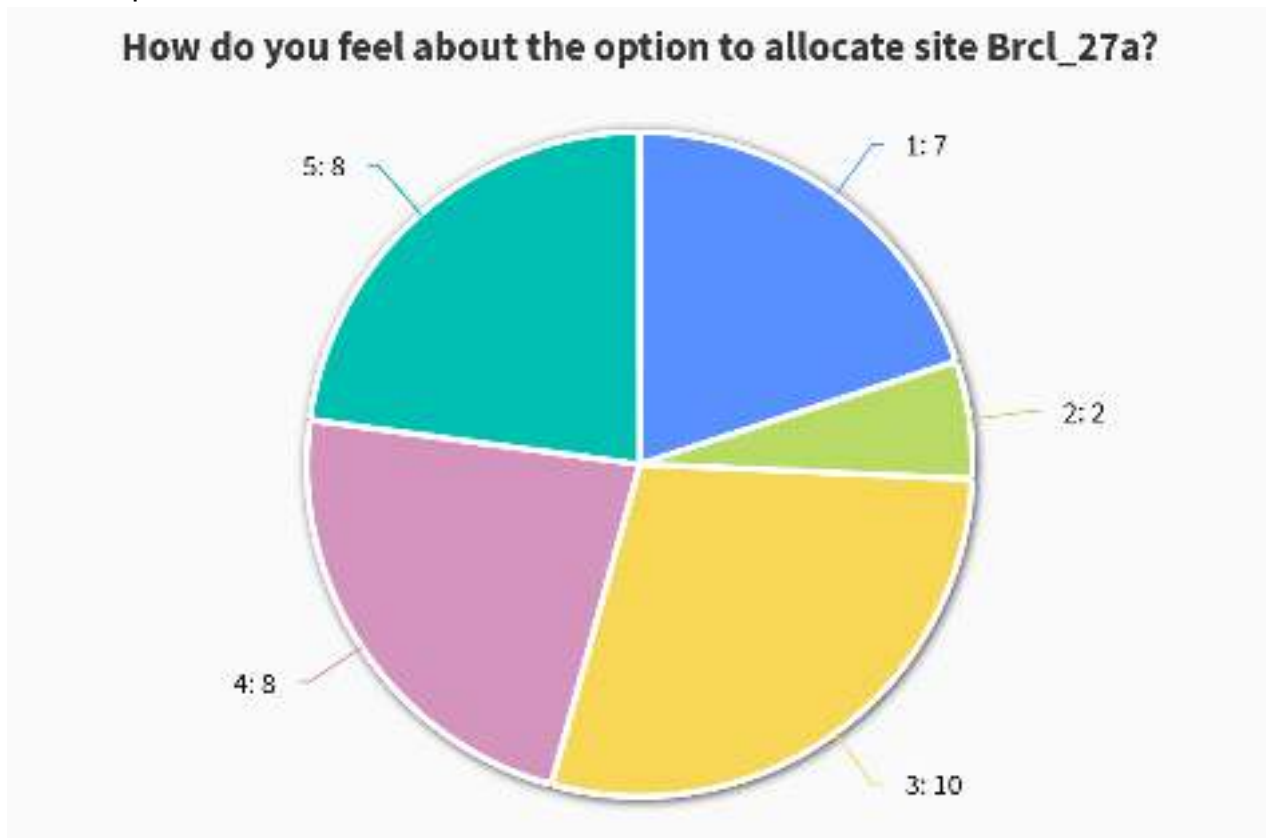
Education state that while Tipton St John primary school has capacity, there is uncertainty around its relocation due to flood risks. The school is part of the DfE's rebuilding programme, but a new site has not been agreed upon. Developer contributions may be needed for home-to-school transport. The King's School has limited capacity and will not expand without a new site. Contributions for secondary school transport would also be required.

7. New Employment Site Allocations

This section of the report we refer to a number of potential employment site use allocations that we consulted on.

Brcl_27a

Total responses: 35



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Brcl_27a in Broadclyst reveal a mix of opinions, with several concerns raised about infrastructure, particularly regarding flooding and traffic. While some see it as a suitable brownfield development, others worry about its impact on the local area and wildlife.

Key points raised, in order of frequency:

- ❑ Traffic and road infrastructure concerns
 - Existing heavy traffic in Broadclyst
 - Need for significant investment in bridge and connectivity
 - Suggestion for a second access point linking to Cranbrook
- ❑ Flooding and hydrology issues
 - Common flooding in the area
 - Need for adequate consideration of hydrology and flood prevention
- ❑ Pedestrian and cycling infrastructure
 - Poor existing cycle and footpath provision
 - Need for safe pedestrian and cycling links to Broadclyst Station and Cranbrook
- ❑ Suitability as a brownfield site
 - Seen as appropriate due to existing industrial use
 - Viewed as a reasonable use of brownfield land
- ❑ Wildlife and environmental concerns
 - Need for protection of existing fauna and flora
 - Concerns about impact on wildlife
- ❑ Archaeological considerations
 - Potential for archaeological findings, requiring evaluation and recording
- ❑ Mixed opinions on necessity and viability
 - Some support for development of the site
 - Concerns about demand and potential for vacant properties

Statutory organisations summary

Historic England

Note the potential presence of non-designated archaeology in this area and request that the site is included in the HESA and that the advice of the County Archaeologist is sought to determine the potential level of significance and risk and this will then inform appropriate site boundaries / capacity / layout and policy criteria for any future site allocation.

Natural England

Advise that the northern part of site contains small slither of a mapped priority habitat Coastal and Floodplain grazing marsh. Suggest onsite verification of the digital mapping (which may be coarse). Depending on type of development, may trigger Impact Risk Zone for the Exe Estuary SPA through any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream.

Devon County Council

Highways advise that the nearby Bluehayes parcel, which forms part of the adopted Cranbrook Plan has a resolution to grant planning permission subject to a s106 agreement being signed. Obligations involve the realigning/re-routing of traffic through the Bluehayes parcel from Station Road, to also include future highway works to promote sustainable travel on Station Road that will provide a more non-motorised user (NMU) centric environment along

Station Road, in particular the southern section. The County led non-motorised user link from Station Road to Mosshayne Lane also gives more reason to expect a material change in nature of movements along and around this point of the network. DCC Highways would not wish to see any development come forward in advance of these being delivered. Any future application/proposal would still need to be assessed to ascertain whether relevant policy can be complied with and the future relationship with Broadclyst Station/Station Road bridge.

Historic Environment state that aerial photography has identified a circular possible prehistoric or Romano-British ditched enclosure in this area, subsequently built on by the extant industrial estate and the site may contain archaeological and artefactual deposits associated with this enclosure. The impact of development upon the archaeological resource here should be mitigated by a programme of archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be destroyed by the proposed development. This should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority.

Economy support the allocation.

Network Rail

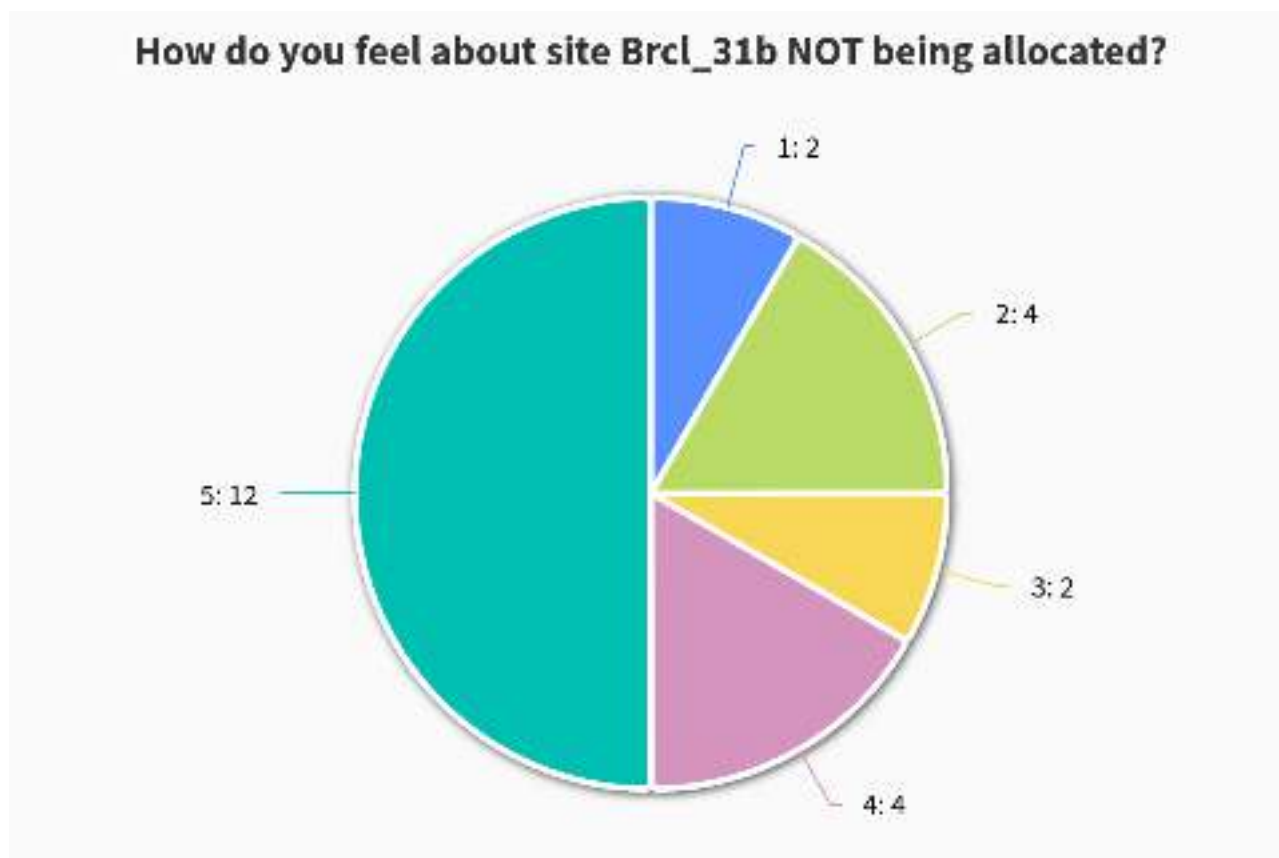
Advise that any change in land use at this site would need improvements to the fencing. This site is also in part on former railway land and is therefore subject to restrictive covenants. It must be considered when Network Rail has access rights over the development site; access must not be blocked or restricted at any time. The applicant must comply with all post sale covenants in the demarcation agreement and understand the implications this will have on the implementation of this development.

Environment Agency

Site is partially located within a flood zone. These flood risks will need to be assessed.

Brcl_31b

Total responses: 24



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Brcl_31b in Broadclyst show a range of concerns, with flooding and traffic issues being the most prominent. There's also a mix of opinions on whether the site should be developed or not.

Key points raised, in order of frequency:

- Flooding concerns
 - High flood risk in the area
 - Need for flood prevention measures before any construction
- Traffic and access issues
 - Potential disruption to vehicle access
 - Concerns about the restricted railway bridge nearby
- Archaeological considerations
 - Site has some archaeological potential, requiring evaluation and recording

- Mixed opinions on development
 - Some support for resolving the site's status
 - Concerns about unplanned, ad hoc development
- Infrastructure concerns
 - Narrow roads in the area

Statutory organisations summary

Network Rail

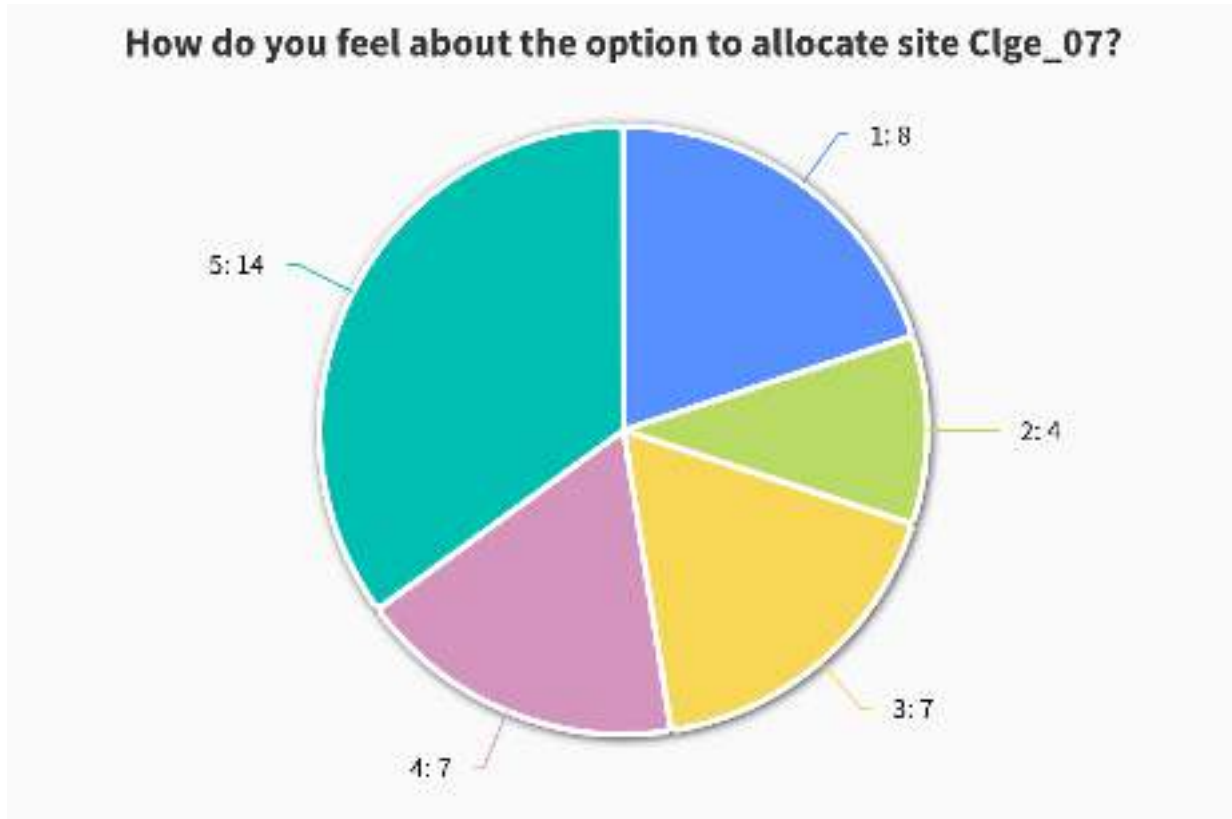
Highlights potential impacts of 1000 new houses, estimating an increase of about 1470 vehicles and 2400 people in the area. While the development is expected to increase usage of the level crossing, the extent is unclear.

Requests that if the site moves forward, any future Transport Assessment should evaluate the predicted usage of Pinhoe level crossing for vehicles, pedestrians, and cyclists after the development's occupation. This data would be used to assess risk levels and determine if mitigation measures are necessary to maintain or reduce current risk levels.

Additionally, the comment advises that any development should consider noise and vibration from the nearby railway and propose appropriate mitigation. This input underscores the importance of thoroughly assessing transportation infrastructure, particularly railway crossings, when planning new developments to ensure safety and manage increased usage.

Clge_07

Total responses: 40



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Clge_07 show a mix of opinions, with concerns primarily focused on wildlife impact and traffic issues. Some see it as a reasonable location for development due to its proximity to existing industrial sites, while others oppose it for various reasons.

Key points raised, in order of frequency:

- Wildlife and environmental concerns
 - Impact on wildlife sites and existing nature
 - Interference with existing Green Wedge
- Traffic and access issues
 - Concerns about difficult two-way access

- Proximity to traffic light junction and potential compromise of traffic flow
- Archaeological considerations
 - Site has archaeological potential, particularly related to the Prayerbook Rebellion battle
- Mixed opinions on suitability
 - Some view it as a reasonable location near existing industrial sites
 - Others see no need for development
- Location and accessibility
 - Good access via A376 and links to M5 noted as positive

Statutory organisations summary

Historic England

While the brief site assessment indicates that there is no intervisibility between the site and the Scheduled Monument of Clyst St Mary Bridge, the visibility of any development on the site would ultimately depend on the height and design of that development. This is evidenced by the fact that Sandy Park rugby ground can be seen from the bridge at a greater distance. We therefore request that this site is included in the HESA to further consider its suitability and, if pursued as an allocation, that policy criteria relating to building height and design are included to avoid further impacts on the setting.

Natural England

Advise depending on type of development, it may trigger Impact Risk Zone for the Exe Estuary SPA through either air pollution any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream.

Devon County Council

Highways will shortly be publishing a Clyst Road Access Strategy. Its intention is to promote NMU activity on this stretch of the network. Any consented development off this parcel (and in the relevant area) will be required to contribute towards achieving and delivering this strategy. Contributions towards other localised mitigation on the highway network may also be needed.

The bus stop on the A376 close to Clyst Road will no longer be served by services 9/9A from June due to safety concerns. There will still be a limited service on the 58, but the frequency reduces from half-hourly to six journeys per day.

Historic Environment state the proposed allocation area lies within an area associated with a 16th century battle and any development here may expose archaeological and artefactual deposits associated with this event. The impact of development upon the archaeological resource here should be mitigated by a programme of archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be destroyed by the proposed development. This should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority.

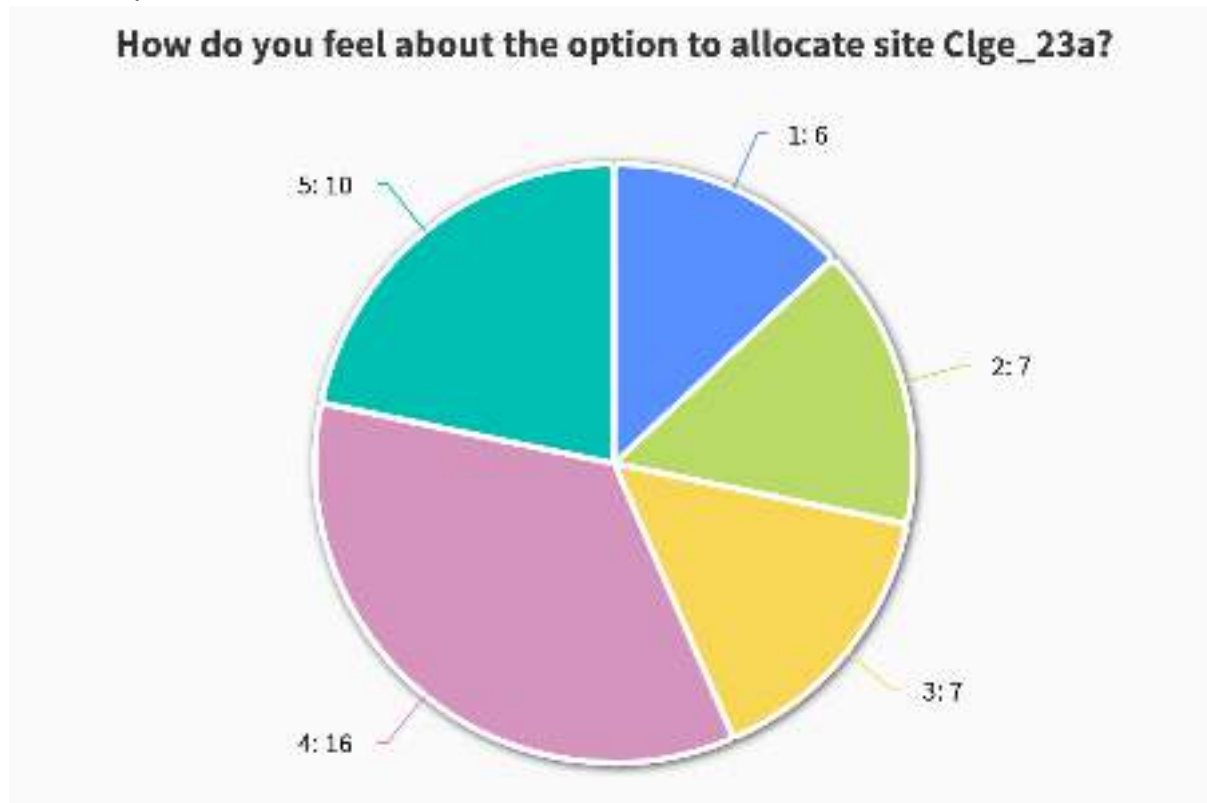
Economy are supportive of this site as it is close to existing employment sites and has supporting infrastructure.

Exeter City Council

Exeter City Council supports the identification of additional employment sites within East Devon in the context of ensuring that the needs of the functional economic area are met strategically. There are a number of additional employment sites proposed close to Exeter, in particular modest sites at Sandy Gate and Darts Farm. The City Council would have no objections to these proposals however further collaboration is needed to consider the implications of development at these locations, in particular regarding transportation. Further discussion is also required to consider the relationship between the Sandy Gate site and the potential for residential development north of Topsham as proposed in the previous draft plan.

Clge_23a

Total responses: 46



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Clge_23a show a mix of opinions, with many seeing it as a reasonable extension of the existing Darts Farm complex. However, there are concerns about traffic, parking, and potential overdevelopment of the area.

Key points raised, in order of frequency:

- Suitability due to existing development
 - Site is already developed or used for storage/ancillary employment.
 - Adjacent to existing commercial buildings and Darts Farm complex.
- Traffic and parking concerns
 - Potential increase in vehicle traffic.
 - Current use as overflow parking for Darts Farm.
 - Concerns about congestion in nearby areas (e.g., Topsham)

- Mixed opinions on development need
 - Some see it as necessary for business expansion.
 - Others feel the area is already overdeveloped.
- Environmental impact
 - Considered unobtrusive if not on agricultural land.
 - Low impact on wildlife noted.
- Overdevelopment
 - Warning against overdevelopment that might reduce location value.

Statutory organisations summary

Natural England

Depending on type of development (likely retail), may trigger Impact Risk Zone for the Exe Estuary SPA where there is any discharge of water or liquid waste that is discharged to ground (ie to seep away) or to surface water, such as a beck or stream. • If the development were to affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA would be required.

Devon County Council

Highways state that the site already accommodates a range of traffic however local network, on the major roads, currently experiences capacity issues. The principle of a modest development may be acceptable, although localised mitigation may be required.

Economy are supportive of this site as it is close to existing employment sites and has supporting infrastructure.

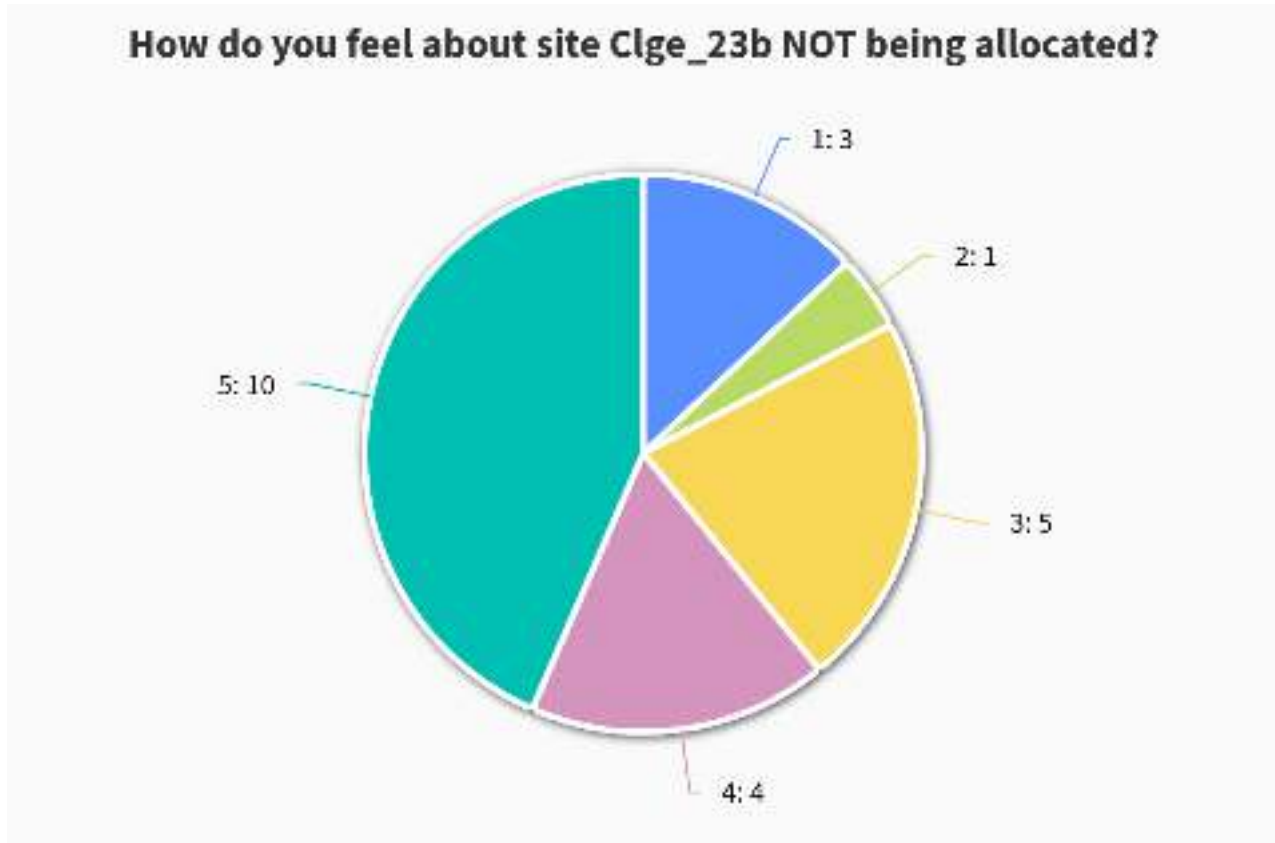
Historic Environment state that proposed allocation area lies within an area where a 16th century battle is recorded and any development here may expose archaeological and artefactual deposits associated with this event. The impact of development upon the archaeological resource here should be mitigated by a programme of archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be destroyed by the proposed development. This should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority.

Environment Agency

Site has surface water flood risks present on site, which will need to be assessed.

Clge_23b

Total responses: 23



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about not allocating site Clge_23b show mixed opinions, with some supporting the decision due to existing development, while others, particularly those associated with Darts Farm, strongly disagree with the non-allocation.

Key points raised, in order of frequency:

- Importance of Darts Farm to local economy
 - Major component of local, Devon, and South West regional economies
 - Employs over 1000 people across 100 companies
 - Key outlet for over 1000 suppliers and businesses in the region
- Disagreement with non-allocation decision
 - Argument that there is scope for further intensification of current employment uses

- Suggestion that non-allocation is an error in the Consultation Plan
- Support for non-allocation
 - Perception that enough development is already planned in the area
 - View that the site is full with little capacity for more
- Parking and congestion concerns
 - Reference to previous comments about customer parking congestion

Statutory organisations summary

Natural England

Depending on type of development (likely retail), may trigger Impact Risk Zone for the Exe Estuary SPA where there is any discharge of water or liquid waste that is discharged to ground (ie to seep away) or to surface water, such as a beck or stream. If the development were to affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA would be required.

Devon County Council

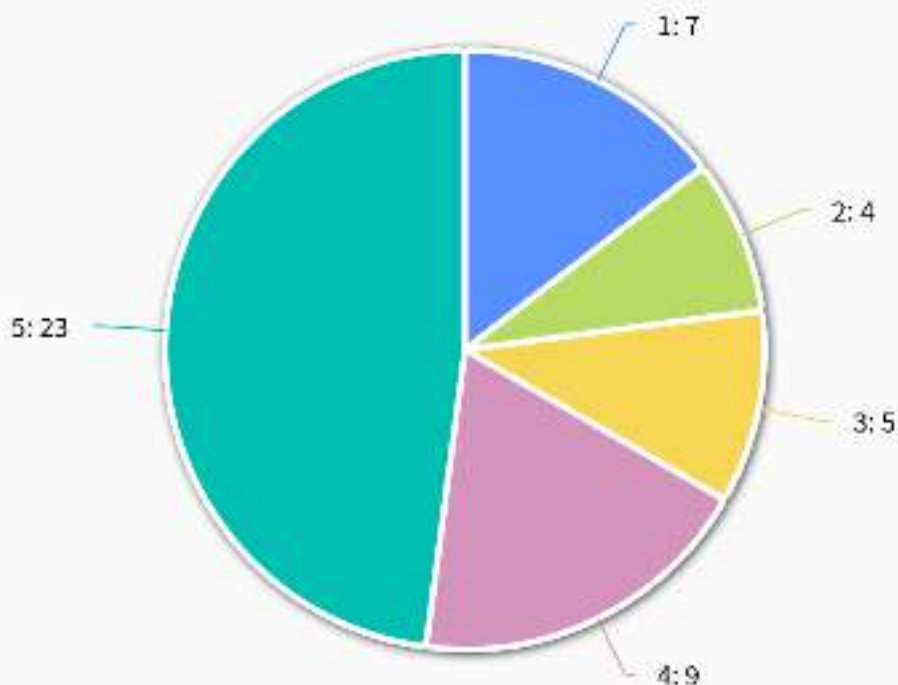
Highways say the site already accommodates a range of traffic however local network, on the major roads, currently experiences capacity issues. The principle of a modest development may be acceptable, although localised mitigation may be required.

Economy support the site as an employment opportunity.

Clge_25

Total responses: 48

How do you feel about site Clge_25 NOT being allocated?



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about not allocating site Clge_25 show a mix of opinions, with most supporting the decision not to allocate, while one detailed comment strongly advocates for its allocation. The main concerns revolve around preserving green space, agricultural land, and the rural character of the area.

Key points raised, in order of frequency:

- Support for non-allocation
 - Desire to preserve green spaces and agricultural land
 - Perception that enough development is already planned in the area
 - Importance of maintaining Darts Farm's rural character
- Archaeological considerations
 - Presence of a known prehistoric or Romano-British farmstead enclosure
 - Preference for non-allocation from an archaeological perspective
- Strong argument for allocation
 - Site described as enclosed by existing development on three sides

- Suggestion that it's suitable for innovative businesses
- Proposal to allocate at least part of the site now
- Environmental and visual impact concerns
 - Concerns about hedgerow removal
 - Site visibility from a distance
 - Presence of a public footpath

Statutory organisations summary

Natural England

Depending on type of development (likely retail), may trigger Impact Risk Zone for the Exe Estuary SPA where there is any discharge of water or liquid waste that is discharged to ground (ie to seep away) or to surface water, such as a beck or stream. If the development were to affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA would be required.

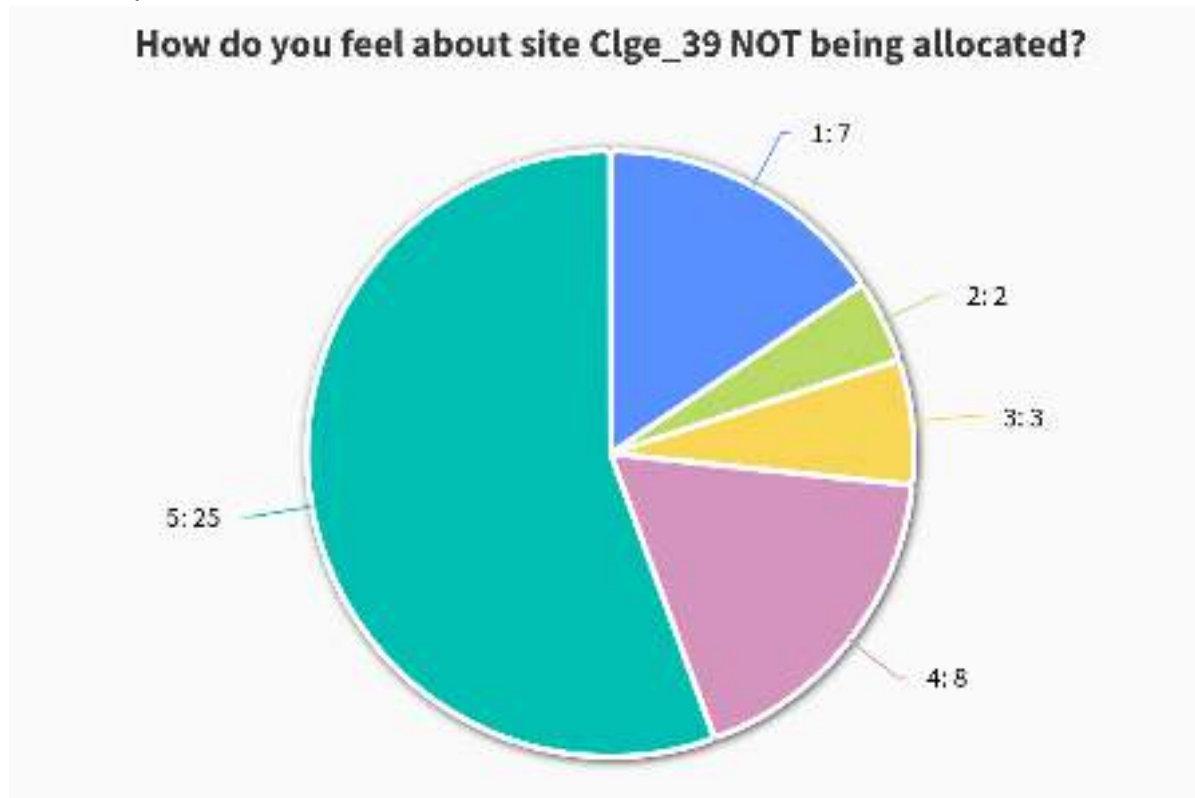
Devon County Council

Highways state that capacity issues already exist on the nearby roundabout on the A379 during peak hours. However, it appears to have been discounted from upcoming allocations, which DCC welcomes.

Economy support the site as an employment opportunity.

Clge_39

Total responses: 35



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about not allocating site Clge_39 show strong support for the decision not to allocate. The main concerns revolve around preserving green spaces, maintaining the rural character of the area, and potential access issues.

Key points raised, in order of frequency:

- Support for preserving green spaces and rural character
 - Desire to retain rural areas and agricultural land
 - Concern about loss of green spaces
 - Perception that development would not be in keeping with the natural environment
- Access issues
 - Poor access to the site
 - Potential need for significant road improvements and traffic lights

- Agreement with rejection decision
 - Perception that development of this land is not locally required
 - Support for the reasons given for rejection
- Archaeological and environmental considerations
 - Some potential for archaeological and environmental evidence
 - Preference for non-allocation from an archaeological perspective
- Preservation of Green Wedge
 - Call to maintain the Green Wedge designation

Statutory organisations summary

Devon County Council

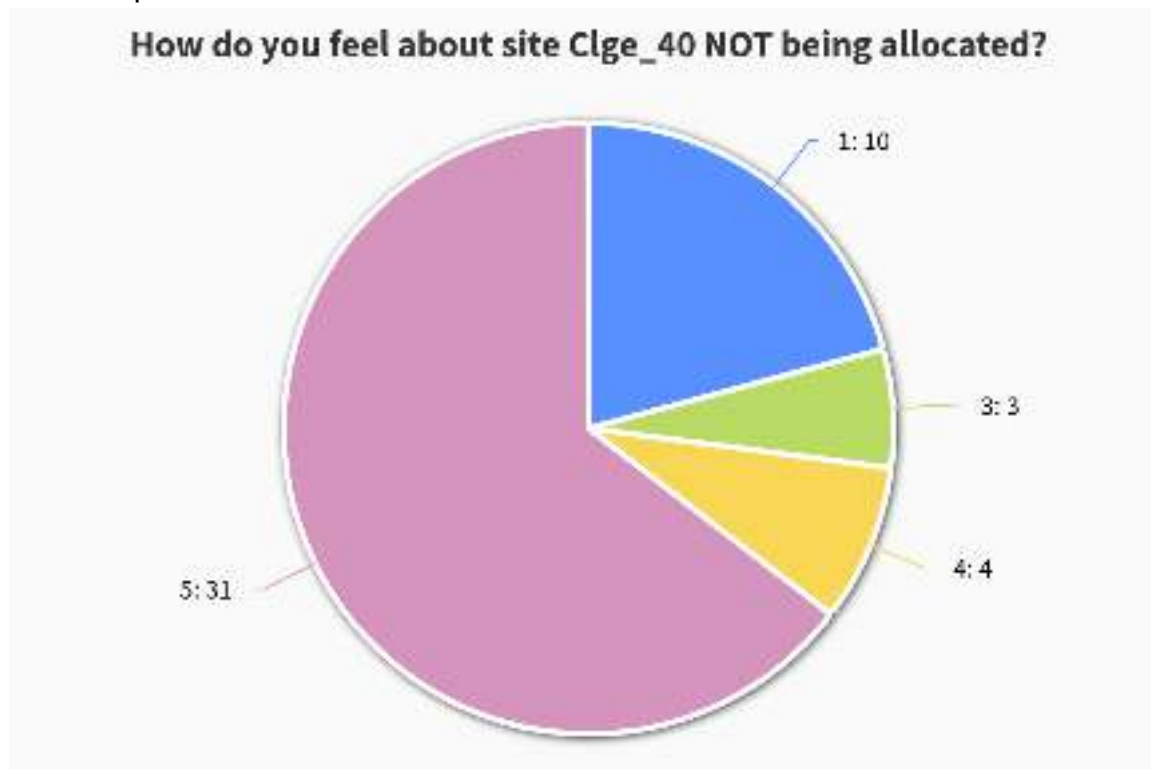
Highways state that the site isn't supported. Constrained approach roads where existing intersection are likely to cause future safety issues. Likely to contribute to capacity issues on the local network in peak hours.

Historic Environment state this proposed allocation area lies within a landscape with evidence of prehistoric and Romano-British settlement and may contain archaeological and artefactual deposits associated with this early settlement of the surrounding landscape. As such, the Historic Environment Team would advise that any planning application for development here should be informed and supported by the results of an appropriate programme of archaeological investigation to understand the significance of any heritage assets affected and enable an informed and reasonable planning decision to be made. The programme of work should consist of a geophysical survey and intrusive archaeological field evaluation.

Economy do not support the site as an employment opportunity as their aim is to concentrate new employment land close to existing employment to ensure a clustering effect and critical mass of activity, including transport accessibility.

Clge_40

Total responses: 48



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses regarding the site Clge_40 not being allocated express a mix of views, with some agreement and some disagreement with the decision. The key themes that emerge are:

- Preservation of rural character and agricultural land
 - Several express support for not allocating the site, citing the importance of maintaining the rural, agricultural nature of the area and preventing further urbanisation.
- Potential impact on heritage assets and archaeology
 - The Devon Archaeological Society notes that the site contains part of a prehistoric or Romano-British settlement site, and that non-allocation is preferable to avoid potential impacts.
- Concerns about increased traffic

- A few respondents raise concerns that developing the site would exacerbate traffic issues in the area, and suggest that any development should be accompanied by improvements to public transport.
- General opposition to further development
 - Some comments express a more general sentiment of opposition to any further development in the area, citing the existing level of development.
- Suitability for employment use
 - One respondent argues that the site is well-suited for employment use, given its location adjacent to the successful Darts Business Park and Darts Farm complexes. They suggest that at least the western half of the site should be allocated.

Statutory organisations summary

Devon County Council

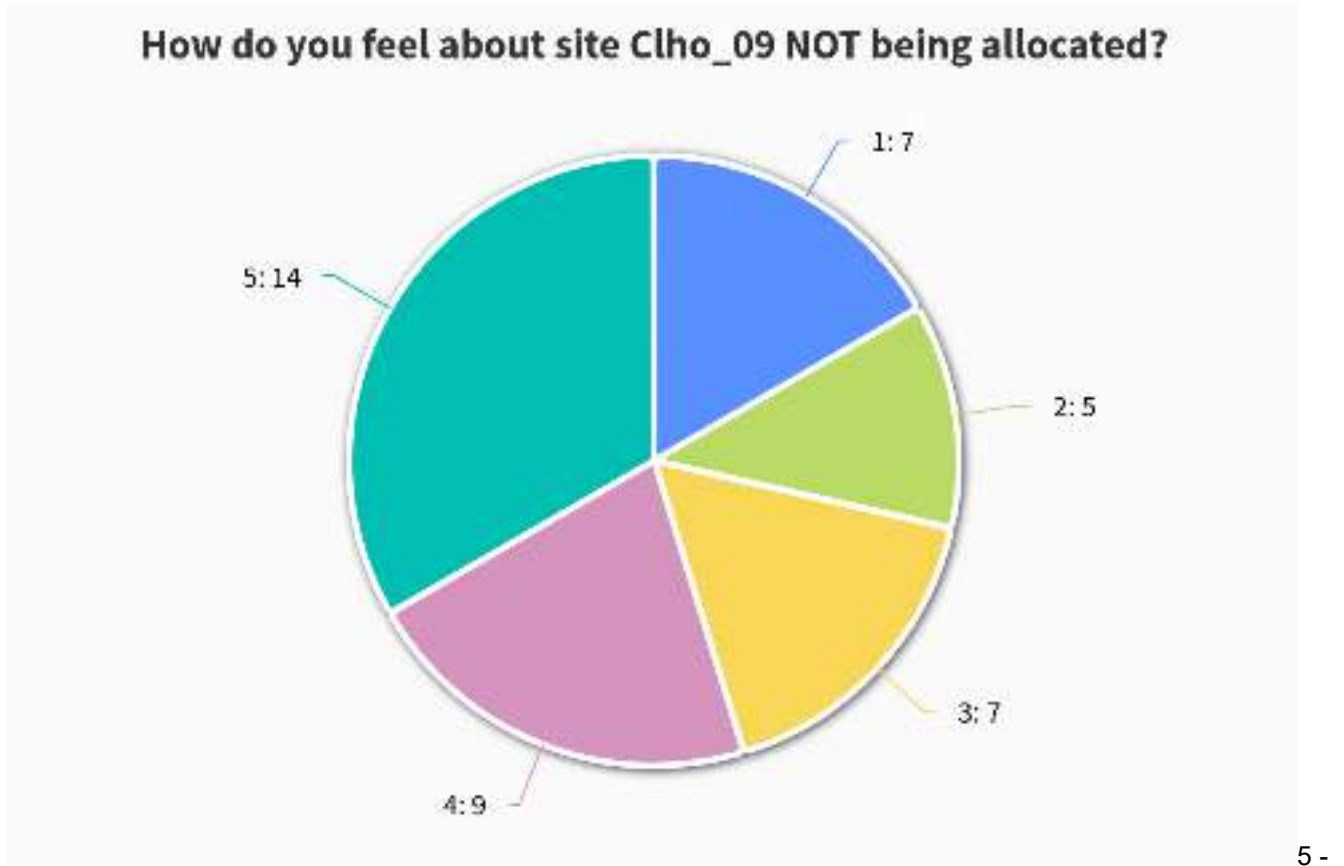
Highways state this site is not supported due to the sizeable site/parcel and close proximity to Clyst St George and Clyst St Mary roundabouts which are a sensitive network that experiences capacity issues. Sits opposite the established Darts Farm that already accommodates high levels of vehicular movements.

Historic Environment state this proposed allocation area is known to contain a large prehistoric or Romano-British D-shaped ditched enclosure, identified through aerial photography. Given the unknown significance and extent of the archaeological site the Historic Environment Team would recommend that this area was taken out of any consideration for future development. However, if this area is to be considered then the Historic Environment Team would therefore advise that this area is not considered for allocation until the results of a programme of archaeological work has been undertaken to understand the extent significance of any heritage assets within this area. The archaeological work should include of geophysical survey and field evaluation.

Economy support as an employment opportunity, however state that the highways and historic environment comments should be noted.

Clho_09

Total responses: 42



Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

Responses to the question about not allocating site Clho_09 show mixed opinions, with some supporting the decision not to allocate while others express disappointment. The main concerns revolve around infrastructure, overdevelopment, and archaeological considerations.

Key points raised, in order of frequency:

- Infrastructure concerns
 - Need for expansion of sewage works to reduce pollution risks
 - Lack of adequate road infrastructure and links to Cranbrook
- Support for non-allocation
 - Perception of overdevelopment in the area

- Belief that better options are available elsewhere (e.g., Skypark area)
- Archaeological considerations
 - Potential for WWII airfield remains and earlier archaeology.
 - Preference for non-allocation from an archaeological perspective
- Disappointment with non-allocation
 - Belief that the site could be suitable for employment use, especially given adjacent housing development

Statutory organisations summary

Devon County Council

Highways state whilst previous comments remain, the neighbouring Treasbeare site now has a signed s106 agreement and therefore an agreed access onto London Road. In principle, this may offer a form of access to the site in the future, subject to policy compliancy and lawful right of access.

Historic Environment state any impact upon the historic WWII airfield should be mitigated by a programme of archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be destroyed by the proposed development. This should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority.

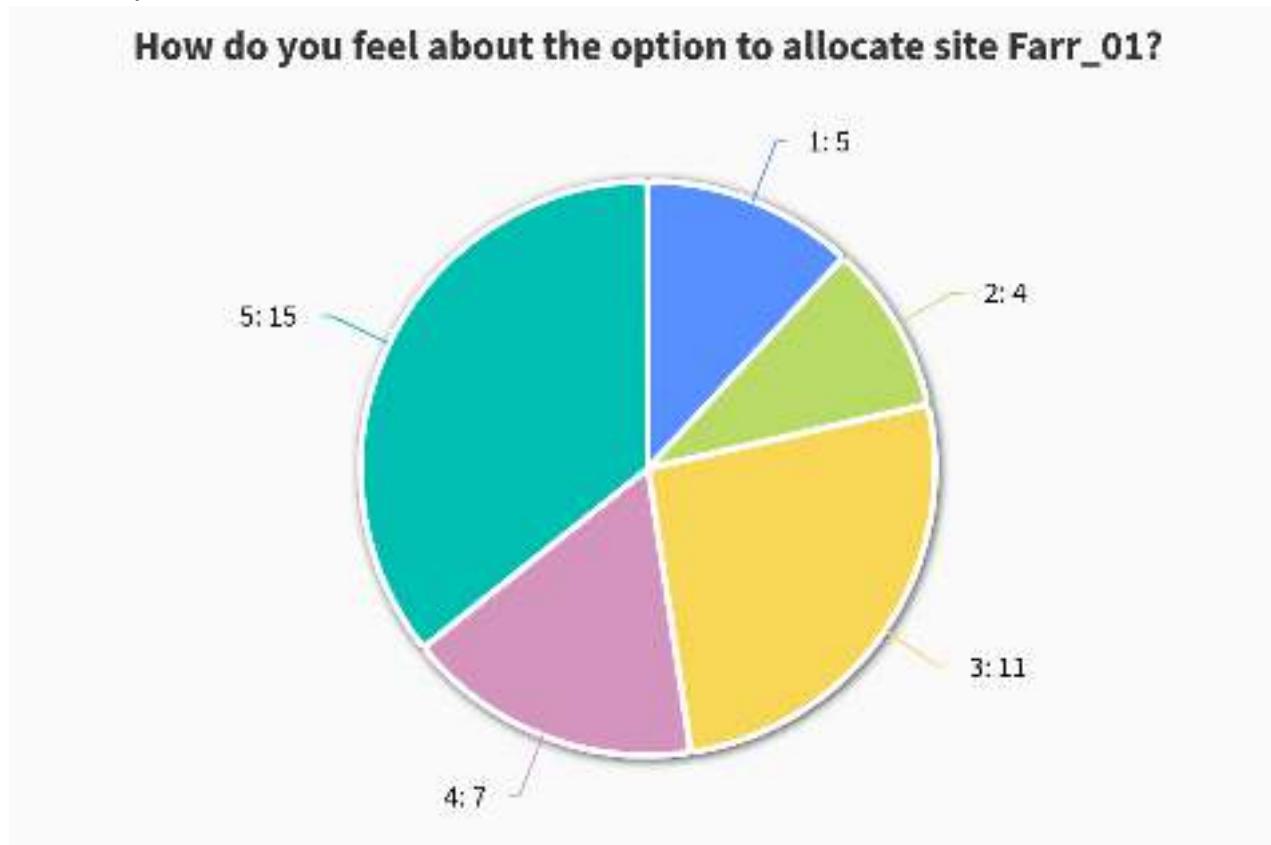
Economy state that if this site were to come forward as an employment site, it will reduce the size of Exeter Airport and be a shrinking of the Airport therefore removing capacity for any future expansion.

Environment Agency

The text should also acknowledge flood risk would also have been a reason to reject the site.

Farr_01

Total responses: 42



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Farr_01 show mixed opinions, with concerns about over-development and infrastructure balanced against the site's existing development and potential suitability for employment use.

Key points raised, in order of frequency:

- Concerns about expansion and over-development
 - Fear of further expansion into Farringdon Parish
 - Worry about changing the agricultural nature of the area
 - Perception of too many industrial areas already present
- Existing development and suitability
 - Site already has some development
 - Viewed as isolated and not suitable for other uses

- Considered appropriate for employment use as a brownfield site
- Environmental considerations
 - Need to protect and retain existing tree belts to reduce visual impact
- Archaeological potential
 - Site has medieval origins and archaeological potential
 - Suggestion for mitigation through evaluation and recording
- Infrastructure concerns
 - Lack of adequate infrastructure to access the area

Statutory organisations summary

Natural England

Depending on type of development, may trigger Impact Risk Zone for impact on Exe Estuary SPA through any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream. • Also, may trigger Impact Risk Zone for impact on East Devon Pebblebed Heaths SPA and SAC if there is any industrial / agricultural development that causes air pollution incl: industrial processes, livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 750m², manure stores > 3500t).

Devon County Council

Highways state previous comments in EDDC's consultation site assessment remain applicable. As stated previously, the site is close to an existing employment site so access may need to be upgraded. Also, the airport access/intersection experiences capacity issues that requires future mitigation.

Historic Environment state Wares Farm is first recorded in the mid-15th century and this proposed allocation area may contain archaeological and artefactual evidence associated with the medieval settlement here. The impact of development upon the archaeological resource here should be mitigated by a programme of archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be destroyed by the proposed development. This should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority.

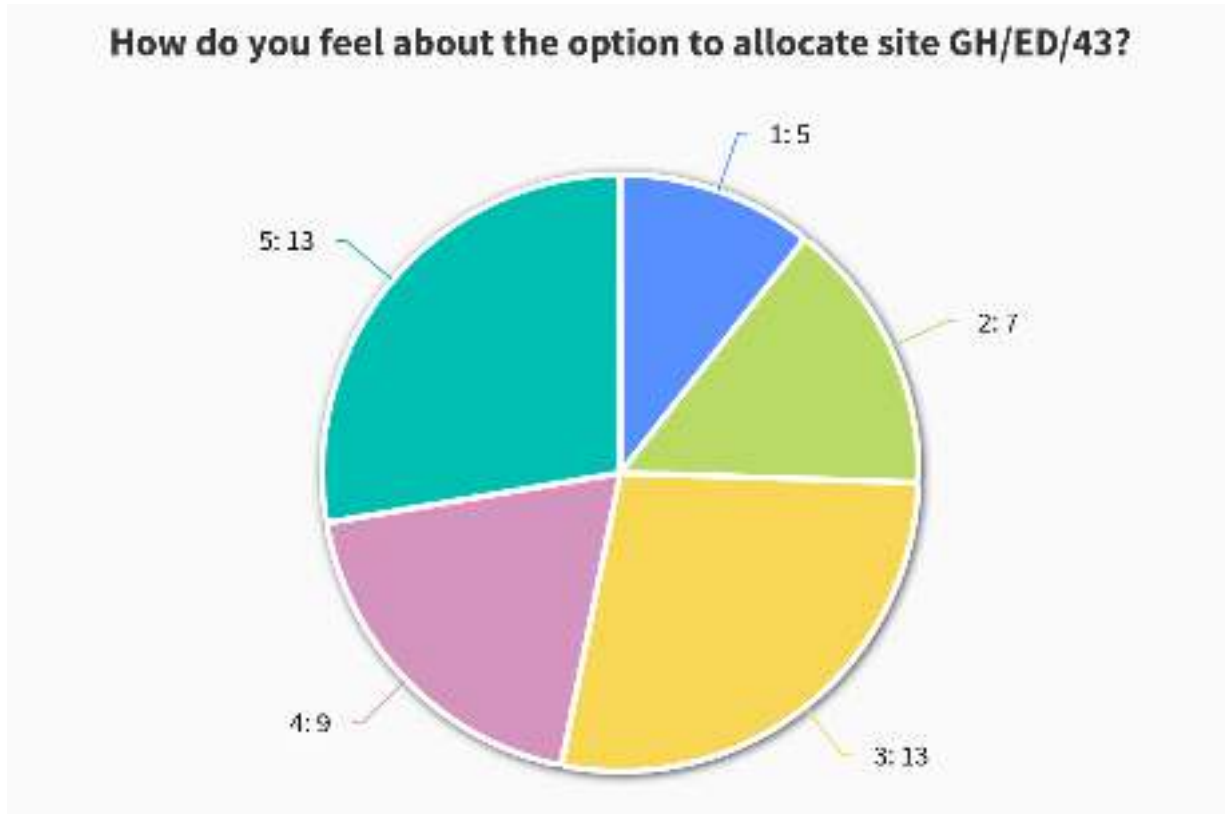
Economy state the site is not supported from an employment perspective. DCC's aim is to concentrate new employment land close to existing employment to ensure a clustering effect and critical mass of activity, including transport accessibility.

Environment Agency

Site is shown to have areas at risk of surface water flooding across site. These risks will need to be assessed to determine how the site can be developed without increasing risks. These areas could provide opportunities for BNG and Green/Blue infrastructure creation. The site is not served by the main sewer network so would need a private foul drainage system.

GH/ED/43

Total responses: 47



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site GH/ED/43 show a strong focus on transportation and access issues. All comments express concerns about the site's suitability due to inadequate infrastructure and connectivity.

Key points raised, in order of frequency:

- Road infrastructure concerns
 - Long Lane described as unsuitable for two-way employment traffic
 - Single track road at this point, requiring widening works
 - Need for alternative route or road upgrade
- Lack of pedestrian and cycling infrastructure
 - No links to Cranbrook for walking or cycling
 - Lack of safe pedestrian access

- Need for pedestrian/cycle links to be extended to the site entrance
- Public transportation issues
 - Limited frequency of public transport
 - Transport schedules not coinciding with employment hours
- Traffic access concerns
 - Insufficient recognition of traffic access issues in the allocation

Statutory organisations summary

Natural England

Depending on type of development, may trigger Impact Risk Zone for impact on Exe Estuary SPA through any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream. • Also, may trigger Impact Risk Zone for impact on East Devon Pebblebed Heaths SPA and SAC if there is any industrial / agricultural development that causes air pollution incl: industrial processes, livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 750m², manure stores > 3500t).

Historic England

This site lies a short distance northeast of existing built development at Exeter Business Park, with low level development also located to the southeast of the site. Otherwise, it is within a rural setting with the airport located to the north. As well as the non-designated heritage associated with the airfield, there are numerous listed buildings located to the east including Grade I listed Rockbeare Manor and its associated Grade II Registered Historic Park and Garden. We therefore request that the site is included in the HESA to establish any potential impacts on heritage assets or their settings and to propose mitigation. Should the site be progressed as an allocation, we request that consideration is given to appropriate policy criteria relating to building height and design, having regard to potential impacts on designated and non-designated heritage assets and the open countryside setting.

Devon County Council

Highways state previous comments in EDDC's consultation site assessment remain applicable. As stated previously, the site is close to an existing employment site so access may need to be upgraded. Also, the airport access/intersection experiences capacity issues that requires future mitigation. Long Lane intersection saturated and requires mitigating, notwithstanding recent Long Lane improvements.

Historic Environment state this proposed allocation site lies within an area of archaeological potential with regard to historic built remains and below-ground elements associated with the WWII aerodrome. The Historic Environment Record indicates the presence of bomb craters within the area under consideration, so the presence of unexploded ordnance on the site should not be discounted without further research and/or survey. In addition, there is evidence

in the surrounding landscape for the presence of prehistoric archaeological deposits so there is the potential for the site to contain evidence from this period too. As such, the Historic Environment Team would advise that any planning application for development here should be informed and supported by the results of an appropriate programme of archaeological investigation to understand the significance of any heritage assets affected and enable an informed and reasonable planning decision to be made. The programme of work should consist of a geophysical survey and intrusive archaeological field evaluation.

Economy state this site is supported as an employment opportunity.

Environment Agency

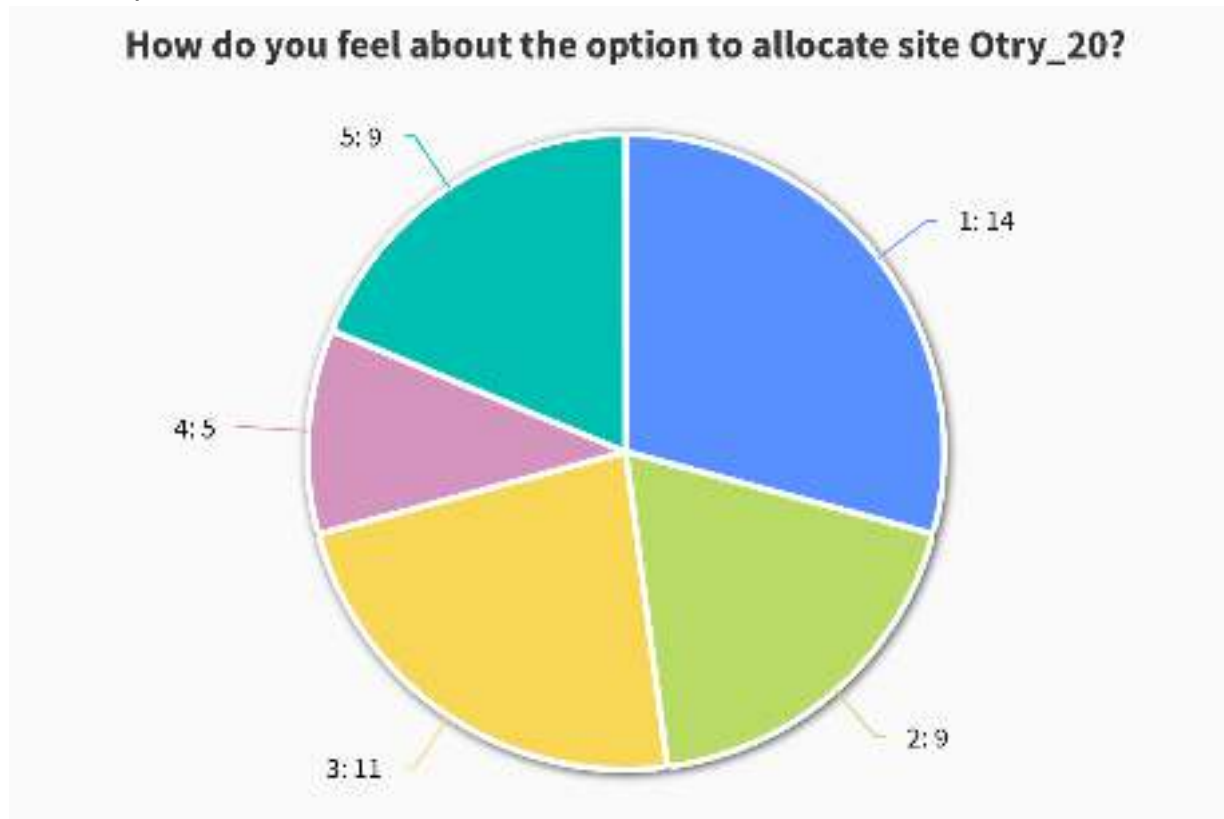
Site has some areas at risk of surface waterflooding on site. The site is not served by the main sewer network so would need a private foul drainage system.

Non-statutory - Exeter and Devon Airport

Object for highways and access reasons. It is extremely unlikely that a new junction with the A30 will be provided. Long Lane improvements do not extend to this site. The LDO land is between the proposed allocation and the junction with the B3184. Traffic from development of the LDO land and the proposed allocation would add pressure to this junction. This is further complicated by the entrance to the Airport being between the LDO land and the junction, and the main Airport car park being accessed at the same junction. The length of queueing at the existing junction is already unacceptable and will be worsened. EDDC needs properly to grapple with the fact that Long Lane - even as improved - is ill suited to support further large scale development, and the junction at the western end of Long Lane cannot cope. The harmful implications of this for the operation of the Airport are very serious indeed. This land should not be allocated.

Otry_20

Total responses: 48



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Otry_20 show mixed opinions, with a majority expressing concerns about various aspects of the proposed allocation. The main issues revolve around traffic and access, environmental impact, and the site's suitability for employment use.

Key points raised, in order of frequency:

- Traffic and access concerns
 - Narrow, unsuitable roads for increased traffic, especially larger vehicles
 - Dangerous junctions and lack of pedestrian safety
 - Limited public transport options
- Environmental and wildlife concerns

- Need for nutrient neutrality and environmental betterment
- Value of existing orchard for insect life and wildlife
- Preference for keeping the land as a green buffer or small holding
- Archaeological considerations
 - Area of archaeological potential, particularly Bronze Age sites
 - Need for evaluation and mitigation
- Questioning the need and suitability
 - Doubts about the viability of employment use in this location
 - Site outside the village boundary
 - Concern about attracting workers from outside the immediate area
- Limited support
 - Conditional support if there's a viable need in the village
 - Broad support from Honiton Town Council

Statutory organisations summary

Natural England

Depending on type of development, may trigger Impact Risk Zone for impact on East Devon Pebblebed Heaths SPA and SAC if there is any industrial / agricultural development that causes air pollution incl: industrial processes, livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 4000m².

Historic England

Owing to the location and topography, development of the site is likely to impact on the setting of at least one Grade II listed building (Sweethams) and potentially other designated and non-designated heritage. We therefore request that it is included in the HESA and that recommendations are made for appropriate mitigation to inform policy criteria. Should the site be progressed as an allocation, we request that consideration is given to appropriate policy criteria such as boundary planting, limiting the height of development, and design and materials that are in keeping with the rural setting.

Network Rail

State the allocation should include engagement with Network Rail to ensure that sufficient land is available to allow access to railway for operational purposes.

Devon County Council

Highways state current practice/use as an orchard and poultry house. Proximity of the site likely to encourage independent travel with modest services in the area to promote sustainable travel.

Historic Environment state this proposed allocation site lies in a landscape where recent archaeological investigations have demonstrated the presence of prehistoric settlement and funerary activity in the landscape surrounding Feniton. As such, the Historic Environment

Team would advise that any planning application for development here should be informed and supported by the results of an appropriate programme of archaeological investigation to understand the significance of any heritage assets affected and enable an informed and reasonable planning decision to be made. The programme of work should consist of a geophysical survey and intrusive archaeological field evaluation.

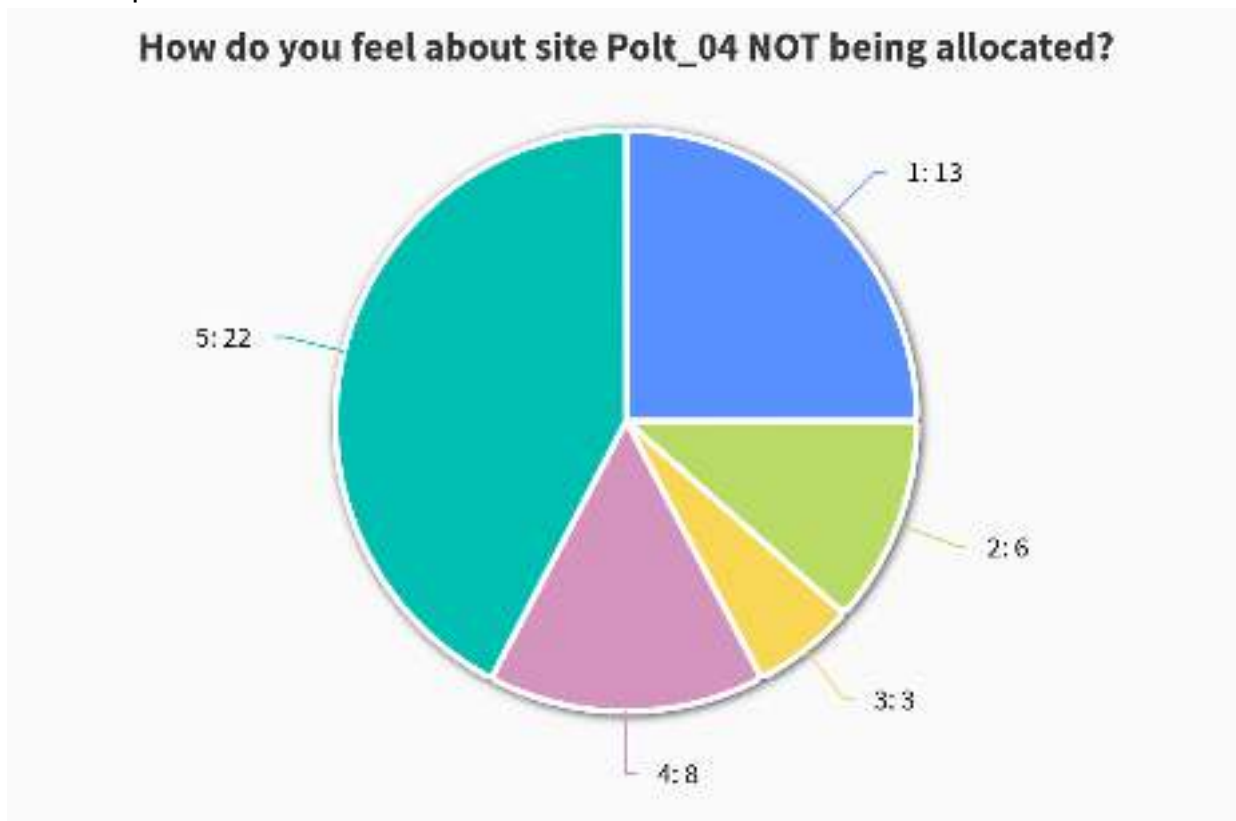
Economy state while supportive of new employment space being brought forwards, this site is not strategically located nor close to existing employment infrastructure.

Environment Agency

Site at Feniton includes constraints including railway land, and historic landfill. These previous uses pose soil and groundwater contamination risk. We also note that this is a site over which the proposed Feniton flood alleviation scheme will pass which could further constrain development potential.

Polt_04

Total responses: 52



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Polt_04 show mixed opinions, with arguments both for and against the allocation. The main points of contention revolve around the need for a motorway service area, environmental and historical impacts, and potential benefits for employment and tourism.

Key points raised, in order of frequency:

- Debate over need for motorway services
 - Some argue it's unnecessary due to nearby existing services
 - Others see it as a good opportunity for a new service station, especially for HGVs
- Environmental and agricultural concerns
 - Potential flooding issues
 - Loss of prime farming land
 - Impact on nature and the Clyst Valley Park
- Historical and cultural impact
 - High archaeological potential
 - Concerns about impact on Poltimore House, Killerton, and Broadclyst
- Employment and economic benefits
 - Potential for creating employment opportunities
 - Support for local food and drink production businesses
- Traffic and infrastructure concerns
 - Worries about increased traffic through Broadclyst
- Tourism benefits
 - Potential positive impact on tourism

Statutory organisations summary

Devon County Council

Highways state this is a sizeable parcel they could generate high levels of vehicular traffic. B3181 to the south is sensitive and this site is likely to further cause issues and impacts on the local network. Removal of this site is supported by DCC. However, if this were to be accessed off the M5 and become a replacement services for either J30/J28 services, or both, this would help to reduce the traffic impact at these busy junctions and would be, in principle, supported by DCC.

Historic Environment state the proposed allocation site contains a known prehistoric or Romano-British settlement site at its southern end and it is likely that there will be other archaeological sites within this area. The area under consideration also lies in proximity to Poltimore House, a Grade II* listed building, and within sight of the Broadclyst Conservation Area. As such, the Historic Environment Team would advise that any planning application for

development here should be informed and supported by the results of an appropriate programme of heritage work to understand the significance of any heritage assets affected and enable an informed and reasonable planning decision to be made. The programme of work should consist of a heritage and visual impact assessment, along with geophysical survey and intrusive archaeological field evaluation. Mitigation measures may be required to minimise the visual impact of any development here.

Economy state Poltimore sites should only be for development in exceptional circumstances i.e. for something bespoke and strategic that would require that specific location and be very high quality development. We would not support general employment land at these sites. Due to the visual sensitivity of the locality, at a prime gateway into Devon, any development at these sites would need to be of high quality design and with screening and environmental enhancements.

Exeter City Council

Supports additional employment sites in East Devon for strategic economic area needs.

Specifically endorses previously discounted Poltimore area allocations due to potential to replace existing Exeter Services at M5 Junction 30. Aligns with Exeter Plan Draft Policy STC8 supporting alternative uses at current services site

Would remove services traffic from Junction 30

Improves local and strategic connectivity at key transport node

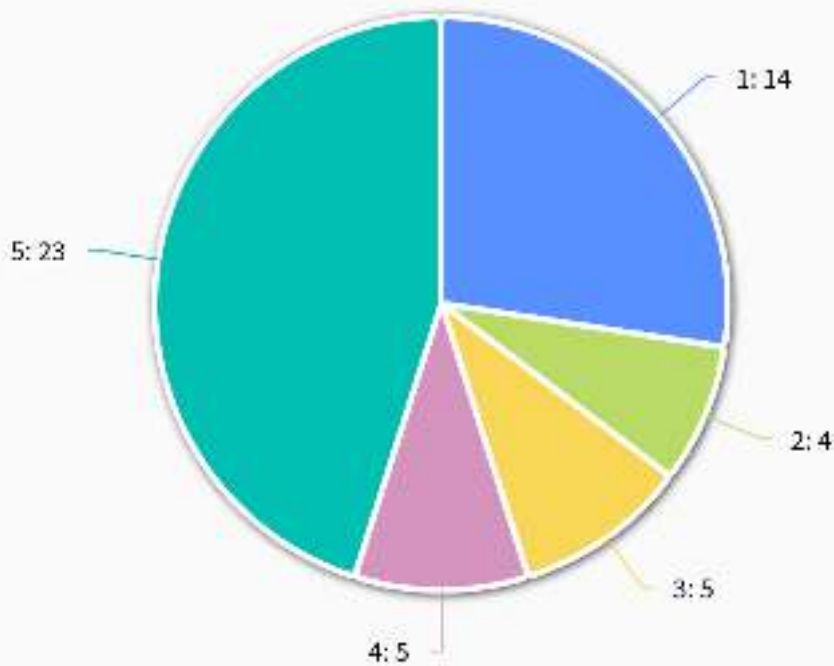
Could better accommodate future development traffic from wider sub-region, Exeter and second new East Devon community

Recommends Poltimore allocation as part of comprehensive strategy to unlock strategic transport improvements.

Polt_06

Total responses: 51

How do you feel about site Polt_06 NOT being allocated?



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about not allocating site Polt_06 show mixed opinions, with a majority supporting the decision not to allocate. The main points of contention are similar to those for Polt_04, revolving around the need for motorway services, environmental and historical impacts, and potential economic benefits.

Key points raised, in order of frequency:

- Support for non-allocation
 - No perceived need for additional motorway services
 - Concerns about size and impact on the area
 - Potential negative visual impact on the landscape
- Debate over need for motorway services

- Some argue it's unnecessary due to nearby existing services
- Others see it as a good opportunity for a new service station, especially for HGVs
- Historical and cultural impact
 - High archaeological potential
 - Concerns about impact on Poltimore House and its park
- Environmental and agricultural concerns
 - Potential flooding issues
 - Impact on existing agricultural land
- Economic and employment benefits
 - Potential for creating jobs and strengthening the local economy
- Location considerations
 - Acknowledgment that bridging a motorway could be a good idea, but this specific location is problematic

Statutory organisations summary

Devon County Council

Highways state this is a sizeable parcel they could generate high levels of vehicular traffic. B3181 to the south is sensitive and this site is likely to further cause issues and impacts on the local network. Removal of this site is supported by DCC. However, if this were to be accessed off the M5 and become a replacement services for either J30/J28 services, or both, this would help to reduce the traffic impact at these busy junctions and would be, in principle, supported by DCC.

Historic Environment state the proposed allocation site contains a known prehistoric or Romano-British settlement site within its eastern part and it is likely that there will be other archaeological sites within this area. The western part of the site lies to the west of the M5 and within sight of the grade II* listed Poltimore House and associated parkland. Given the sensitivity of this landscape to development the Historic Environment Team would advise that the western parcel of land (west of the M5) is excluded from consideration as part of this proposed allocation area. Given the proximity to Poltimore House, a Grade II* listed building, and being in sight of the Broadclyst Conservation Area the Historic Environment Team would advise that any proposals for development here should be informed and supported by the results of an appropriate programme of heritage work to understand the significance of any heritage assets affected and enable an informed and reasonable planning decision to be made. The programme of work should consist of a heritage and visual impact assessment, along with geophysical survey and intrusive archaeological field evaluation. Mitigation measures may be required to minimise the visual impact of any development here.

Economy state Poltimore sites should only be for development in exceptional circumstances i.e. for something bespoke and strategic that would require that specific location and be very high quality development. We would not support general employment land at these sites. Due to the visual sensitivity of the locality, at a prime gateway into Devon, any development at

these sites would need to be of high quality design and with screening and environmental enhancements.

Exeter City Council

Supports additional employment sites in East Devon for strategic economic area needs.

Specifically endorses previously discounted Poltimore area allocations due to potential to replace existing Exeter Services at M5 Junction 30. Aligns with Exeter Plan Draft Policy STC8 supporting alternative uses at current services site

Would remove services traffic from Junction 30

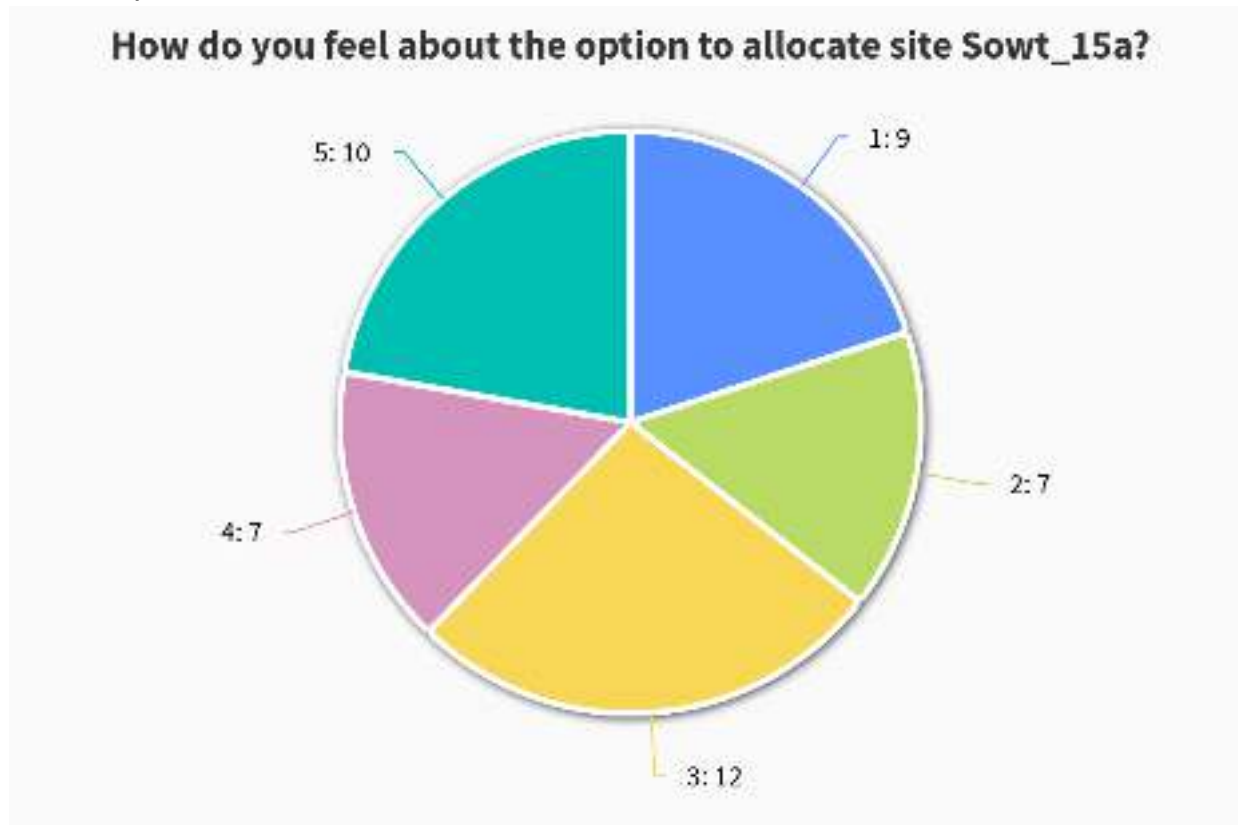
Improves local and strategic connectivity at key transport node

Could better accommodate future development traffic from wider sub-region, Exeter and second new East Devon community

Recommends Poltimore allocation as part of comprehensive strategy to unlock strategic transport improvements.

Sowt_15a

Total responses: 45



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about allocating site Sowt_15a show mixed opinions, with some support for the allocation but also significant concerns about traffic, safety, and environmental issues. The site's location within an existing industrial area is seen as both a positive and a potential problem.

Key points raised, in order of frequency:

- Traffic and access concerns
 - Need for traffic lights or a roundabout at Oil Mill Lane/A1000 junction
 - Existing traffic congestion during peak times
 - Dangerous access from Oil Mill Lane
- Safety issues
 - Concerns about relocating school children's pick-up point

- Near misses at junction with Enfield Farm
- Potential suitability
 - Support for developing the western end only
 - Seen as a reasonable expansion to adjacent development
 - Within existing industrial area with no apparent residential impact
- Environmental concerns
 - Smell from pig farm and digester
 - Noise pollution from digester
- Archaeological considerations
 - Some archaeological potential, requiring evaluation and recording
- Tree protection
 - Support conditional on genuine protection of trees
- Public transport
 - Concern about insufficient bus links

Statutory organisations summary

Natural England

Depending on the type of development, may trigger Impact Risk Zone for the Exe Estuary SPA with any industrial/agricultural development that could cause air pollution (incl: industrial processes, livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 750m², manure stores > 3500t) or any discharge of water or liquid waste of more than 5m³/day to ground (ie to seep away) or to surface water, such as a beck or stream. • Also, may trigger Impact Risk Zone for the East Devon Pebblebed Heaths SPA and SAC if includes Livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 4000m².

Historic England

Say that while this site is to some extent flanked by buildings and uses of an industrial character, it is also located within a wider countryside setting and in close proximity to a number of Grade II listed buildings. We therefore request that the site is included in the HESA to make recommendations for mitigation and criteria relating to matters such as building height and design, materials and landscaping to be included in any site allocation policy.

Devon County Council

Highways state this parcel sits in an area of an established business park, however, also sits in close proximity to Clyst St Mary, the roundabout of which experiences capacity issues during peak times. The immediate access off the A3052 currently entails a right turn lane, however any future development off this parcel would need to involve the reassessment of the suitability of the existing arrangement. Mitigation will be required should the new community be delivered within the area to afford additional capacity on the network in the future.

Historic Environment state no anticipated impact upon any heritage assets with archaeological interest. As such, the Historic Environment Team has no comments to make on this proposed allocation area.

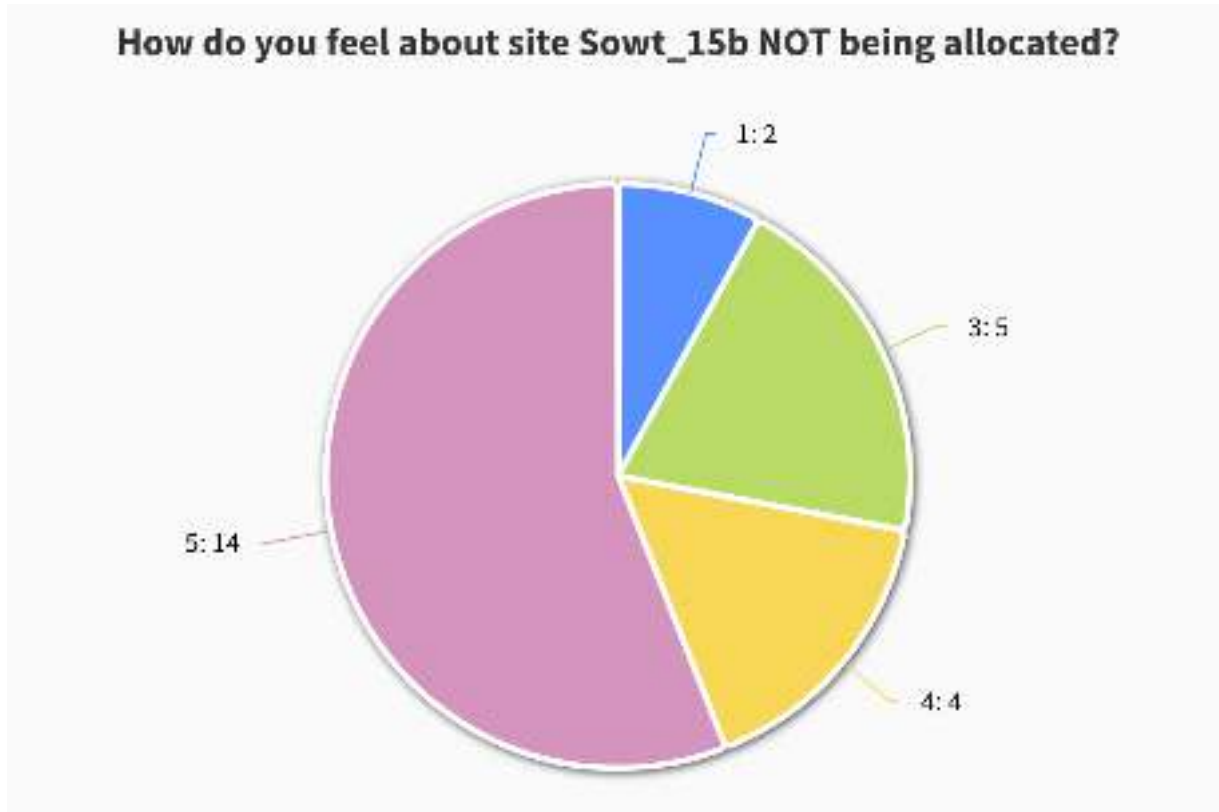
Economy support the site as an employment opportunity.

Environment Agency

Site is near the Enfield Anaerobic Digestion plant which is a regulated site. The site currently has a good record of compliance with its environmental permit. Whilst it does attract regular complaints about noise, the Environment Agency has been unable to substantiate the level of pollution reported since improvements were made by the operator last year.

Sowt_15b

Total responses: 25



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about not allocating site Sowt_15b show a general agreement with the decision not to allocate, with one exception. The main concerns revolve around traffic issues, impact on local residents, and the sufficiency of other available sites.

Key points raised, in order of frequency:

- Support for non-allocation
 - Perception that existing operations in the area already cause problems for locals
 - Proximity to residential housing
 - Concerns about traffic impact on the strategic road network
- Traffic concerns
 - Existing operations causing issues for locals
 - Potential for huge traffic movement that could compromise the road network

- Archaeological considerations
 - Some archaeological potential, which could be mitigated through evaluation and recording
- Potential for consideration
 - One comment suggesting the site should be considered for allocation

Statutory organisations summary

Natural England

Depending on the type of development, may trigger Impact Risk Zone for the Exe Estuary SPA with any industrial/agricultural development that could cause air pollution (incl: industrial processes, livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 750m², manure stores > 3500t) or any discharge of water or liquid waste of more than 5m³/day to ground (ie to seep away) or to surface water, such as a beck or stream. • Also, may trigger Impact Risk Zone for the East Devon Pebblebed Heaths SPA and SAC if includes Livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 4000m².

Devon County Council

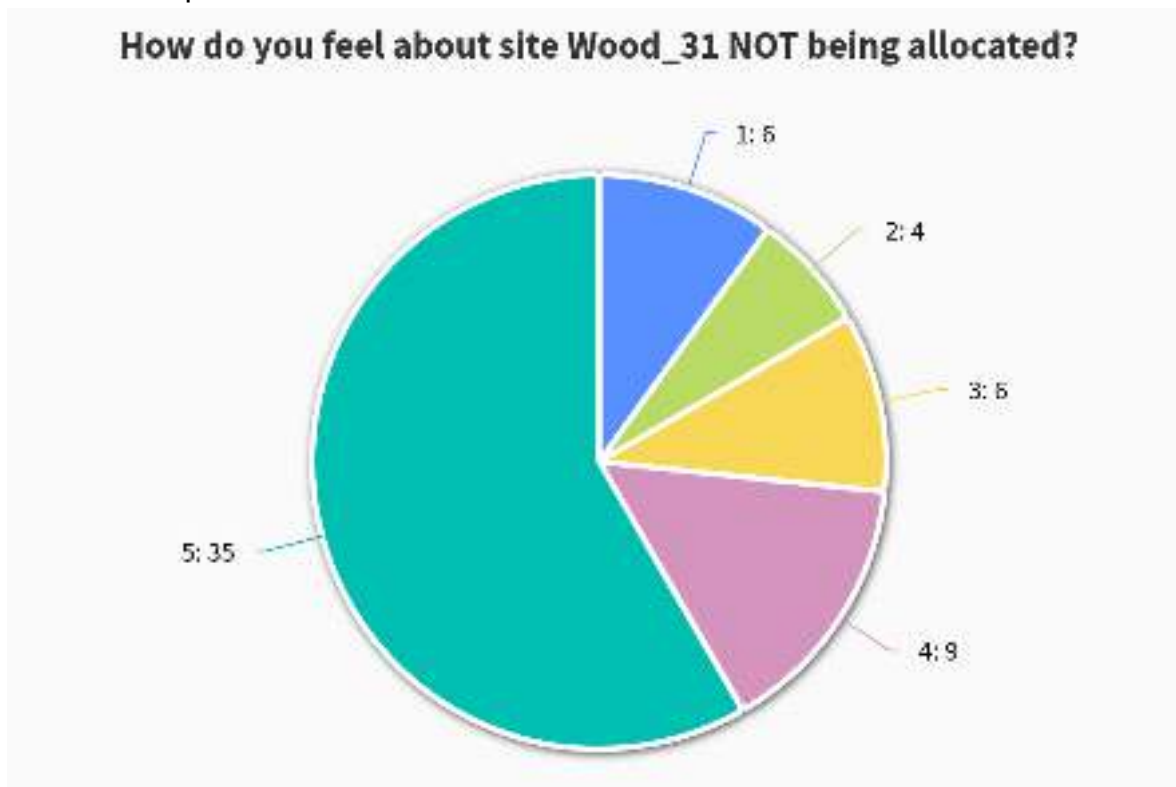
Highways state this parcel sits in an area of an established business park, however, also sits in close proximity to Clyst St Mary, the roundabout of which experiences capacity issues during peak times. The immediate access off the A3052 currently entails a right turn lane, however any future development off this parcel would need to involve the reassessment of the suitability of the existing arrangement. Mitigation will be required should the new community be delivered within the area to afford additional capacity on the network in the future.

Environment Agency

Site is near the Enfield Anaerobic Digestion plant which is a regulated site. The site currently has a good record of compliance with its environmental permit. Whilst it does attract regular complaints about noise, the Environment Agency has been unable to substantiate the level of pollution reported since improvements were made by the operator last year.

Wood_31

Total responses: 60



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses regarding the site Wood_31 not being allocated express a general agreement with the decision, with a few dissenting voices. The key themes that emerge are:

- Preservation of rural character and agricultural land
 - The site forms part of an open space between Woodbury and Lymphstone, and its development would further encroach on the countryside
 - The area is characterised by high-quality agricultural land and landscape sensitivity
- Concerns about infrastructure and accessibility
 - Poor public transport, cycling, and walking options make the site unsuitable for further expansion
 - Existing road infrastructure is not adequate to support more businesses in the area
- Environmental and archaeological considerations

- The expansion of the Coastal Preservation Area means the area should not be developed
- Existing development and the need for further expansion
 - The industrial park has already expanded considerably into the countryside
 - There is a need for further expansion of the Woodbury Business Park
- Potential visual impact
 - Development of the site would be prominent and obscure long views of the village
- Flooding concerns
 - The road at the lowest point near the substation has a history of flooding, and replacing porous grassland with buildings and hard-standing would exacerbate the problem

Statutory organisations summary

Devon County Council

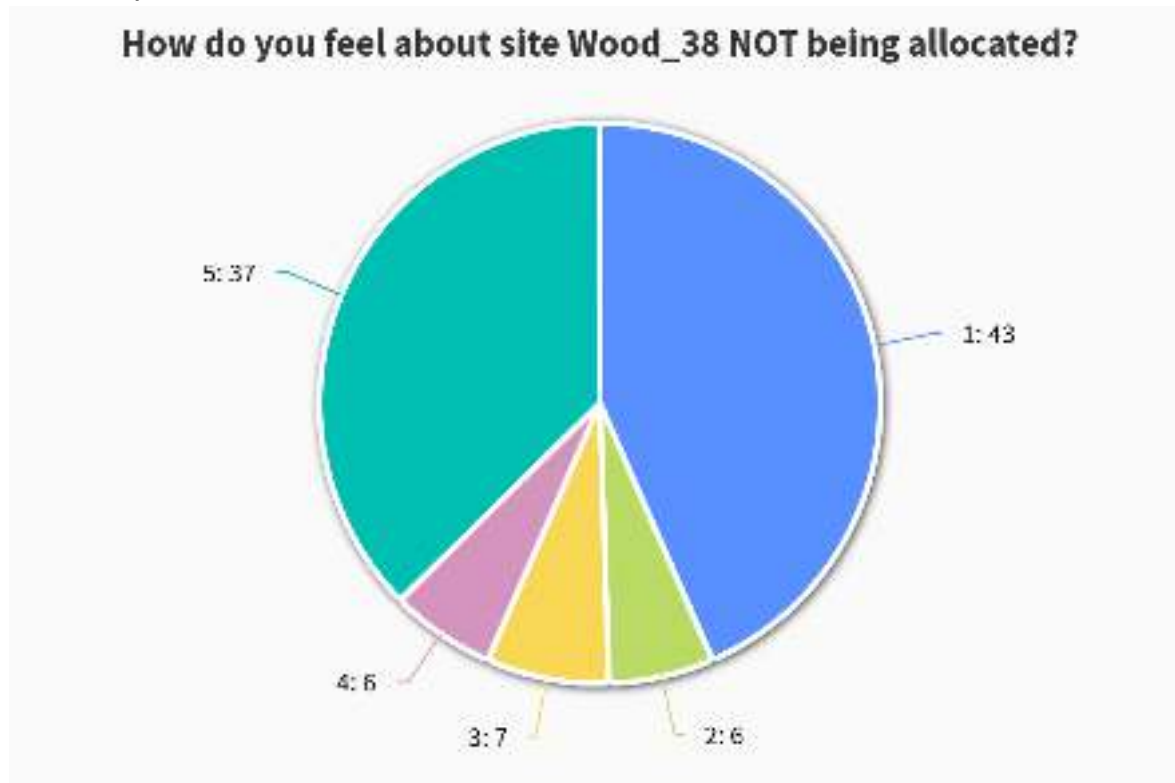
Highways Agree with comments made in the site assessment summary and conclusion, and for the site being discounted for a future allocation.

Historic Environment state no anticipated impact upon any heritage assets with archaeological interest. As such, the Historic Environment Team has no comments to make on this proposed allocation area.

Economy are supportive of this site as it is close to existing employment sites and has supporting infrastructure.

Wood_38

Total responses: 99



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses regarding the site Wood_38 not being allocated express a mix of views, with some agreement and some disagreement with the decision. The key themes that emerge are:

- Concerns about infrastructure and accessibility
 - Flooding and traffic issues on the A100 during peak times
 - Lack of or limited access to public transport
 - Insufficient road capacity to support additional development
- Environmental and archaeological considerations
 - The site has some archaeological potential and is within the setting of the Prayerbook Rebellion battlefield of Woodbury
 - Concerns about the impact on the landscape and agricultural land
- Potential economic benefits and need for employment land

- Support for the development to provide more jobs and business opportunities in the area
- Concerns that not allocating the site could hamper commercial development and economic growth in East Devon
- Scale and impact of proposed development
 - Concerns that the proposed large-scale development is inappropriate at the present time
 - Suggestions to work with landowners to explore a more suitable, smaller-scale solution
- Existing development and the need for further expansion
 - The business park has already expanded considerably into the countryside
- Potential for mitigation and integration with the wider area
 - Suggestions to incorporate green spaces, landscaping, and visual buffers to soften the impact
 - Opportunities to link the development with the Clyst Valley Regional Park (CVRP)

Statutory organisations summary

Devon County Council

Highways A3052 has capacity issues as already raised, and the proximity of the site presents limited realistic public transport opportunities.

Historic Environment state the proposed allocation area lies to the south of Windmill Hill, the site of a battle in 1549 fought during the Prayer Book Rebellion, and in a landscape where archaeological investigations have shown the presence of prehistoric and Romano-British settlement activity. While some parts of the site have already been disturbed by previous development parts of the site are still greenfield sites. As such, the Historic Environment Team would advise that any planning application for development here should be informed and supported by the results of an appropriate programme of archaeological investigation to understand the significance of any heritage assets affected and enable an informed and reasonable planning decision to be made. The programme of work should consist of a geophysical survey and intrusive archaeological field evaluation.

Minerals and Waste say this site is not located within a MSA, as such the minerals planning authority has no objection. The majority of the northern part of the site is located within a Waste Consultation Zone for the Greendale Barton waste transfer and recycling site and therefore Policy W10 of the Devon Waste Plan applies. This policy seeks to protect existing waste management facilities from constraint by non-waste development. The waste transfer station and recycling site could result in odour and noise impacts. The proposed allocation of this site is for employment uses, which is considered to be less sensitive to these impacts, therefore the waste planning authority has no objection but notes there is potential for the creation of inert material during any demolition and construction. Principles of waste reduction and reuse should be considered in the layout, design and levels of any development at this

site. The potential for on-site reuse of inert material should be considered, as this will reduce the generation of waste and subsequent need to export waste off-site for management.

Economy are supportive of this site as an employment opportunity.

General Comments

We also asked a general question, through the consultation portal about peoples views on the allocation of employment sites in general.

Do you have any other comments on the New Employment Site Allocations?

The responses to the question about new employment site allocations reveal a mix of opinions, with some support for increased business opportunities but also significant concerns about location, infrastructure, and environmental impact. Many respondents emphasise the need for better planning to ensure employment sites are appropriately located and serve local communities. There are also calls for utilising existing vacant spaces before allocating new areas for development.

Key points raised, in order of frequency:

- Concerns about location and infrastructure
 - Need for better public transport accessibility
 - Worries about increased traffic and impact on road networks
 - Preference for locating sites near major roads or existing infrastructure
- Calls to utilise existing vacant employment spaces
 - Questions about allocating new space when current sites are underutilised
 - Suggestions to redevelop unused employment sites
- Support for business growth and development
 - Recognition of need for more business units in East Devon
 - Encouragement for bold action to support economic growth
- Need for balanced and strategic planning
 - Importance of aligning employment sites with housing developments
 - Concerns about incompatible adjacent land uses
- Environmental and local impact considerations
 - Worries about overdevelopment affecting wildlife and local beauty
 - Specific objections to certain site allocations
- Calls for more detailed assessments
 - Requests for more thorough traffic impact assessments
 - Need for clearer picture of business class allocations across the region
- Importance of local engagement
 - Calls for involving parish councils in discussions about rural employment sites
 - Concerns about disbelief among locals regarding impact assessments
- Support for mixed-use developments

- Preference for sites serving local working communities
- Alignment with low carbon aspirations
- Requests for more sites or options
 - Calls for EDDC to identify more sites
 - Desire for employment opportunities closer to specific towns (e.g., Exmouth)

Statutory organisations summary

Teignbridge District Council

Welcome the overall consultation and specifically in respect of potential new allocations highlight the importance of assessing transport and traffic impacts associated with any new development across the Greater Exeter area.

Exeter City Council

Supports the identification of additional employment sites within East Devon in the context of ensuring that the needs of the functional economic area are met strategically. There are a number of additional employment sites proposed close to Exeter, in particular modest sites at Sandy Gate and Darts Farm. The City Council would have no objections to these proposals however further collaboration is needed to consider the implications of development at these locations, in particular regarding transportation. Further discussion is also required to consider the relationship between the Sandy Gate site and the potential for residential development north of Topsham as proposed in the previous draft plan. The City Council notes that potential employment allocations in the Poltimore area have been discounted from the Draft Plan. The Council would support these allocations on the basis of their potential to accommodate a motorway service area. A new service area in this location could provide replacement facilities for those currently provided at Exeter Services off Junction 30 of the M5. Draft Policy STC8 of the Exeter Plan sets out City Council support for alternative uses at this site, particularly employment. As well as providing an appropriate site for further development, this would remove services traffic from Junction 30 and the local highway network to improve local and strategic connectivity at a vital transport node for the wider area. This could enable the network to accommodate further development traffic from the wider sub-region including Exeter and as anticipated from the second new community in East Devon. On this basis, allocating a site for motorway services at Poltimore could help to unlock strategic transport connectivity improvements on the strategic road network as part of a wider comprehensive strategy.

Devon County Council

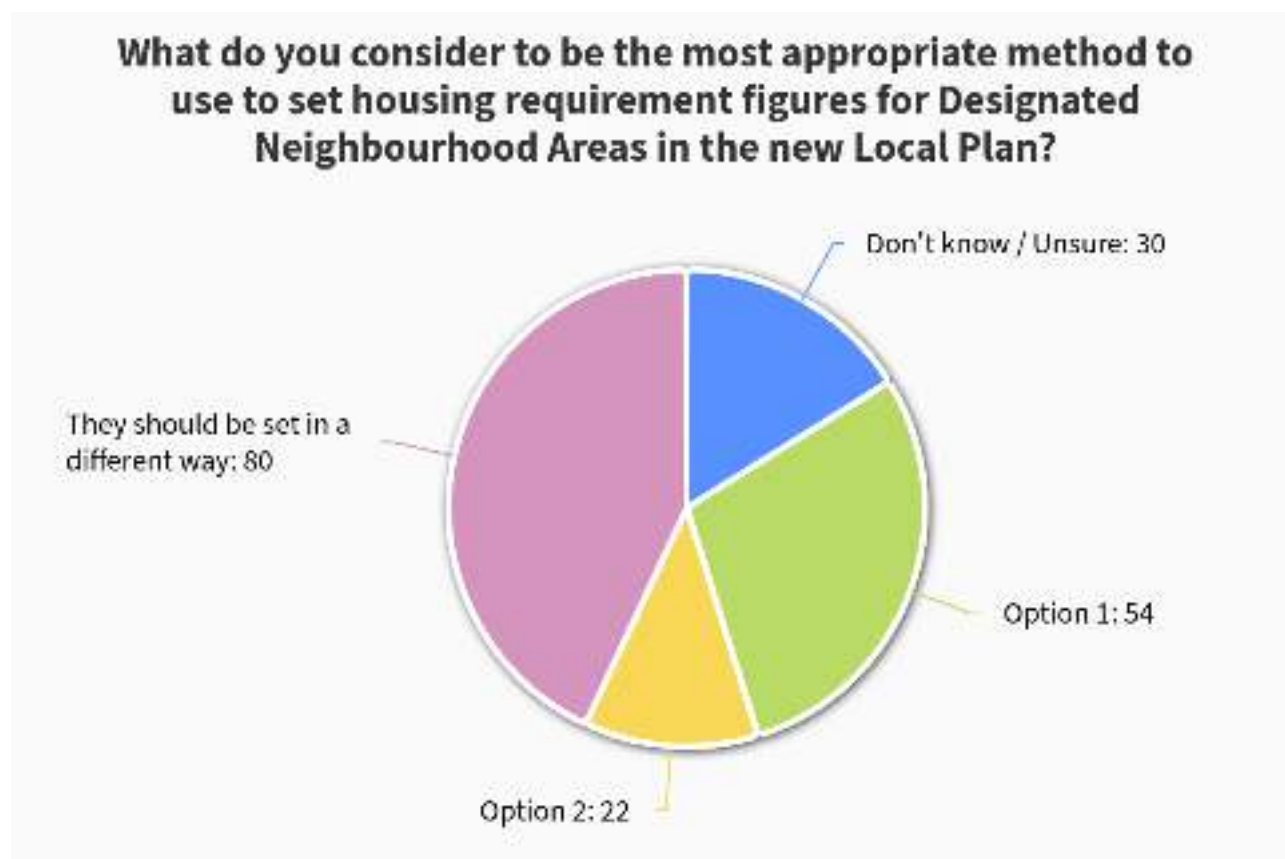
Aim to concentrate new employment land close to existing employment to ensure a clustering effect and critical mass of activity, including transport accessibility. We are supportive of a number of sites that have and have not been allocated by EDDC as indicated in Appendix 1. Would like to remind EDDC that allocating employment sites close to Exeter Airport will reduce

the size of Exeter Airport and therefore remove capacity for any future expansion of the airport. We do not support EDDC's proposal of site allocation Farr_01 as it is not close to existing employment. We agree with EDDC's rejection of the site allocations near Poltimore as these sites should only be for development in exceptional circumstances i.e. for something bespoke and strategic that would require that specific location and be very high quality development. Strongly encourage that all employment site locations within East Devon should incorporate high quality design, environmental enhancements including native species planting and energy saving and generation within the build to enable a pathway towards net zero.

Minerals and Waste state that none of the employment sites, subject of this consultation, are located within a MSA, as such the minerals planning authority has no objection. Most of the sites are not located in a WCZ (Greendale Barton is and detailed comments are provided in that section), therefore the waste planning authority has no objection, however note there is potential for the creation of inert material during any demolition and construction. Principles of waste reduction and reuse should be considered in the layout, design and levels of any development on all the sites. The potential for on-site reuse of inert material should be considered, as this will reduce the generation of waste and subsequent need to export waste off-site for management.

8. Designated Neighbourhood Area Housing Requirements

Total responses: 186



Option 1 - Total of the number of houses that have been built and given planning permission (since 1st April 2010) plus the number of houses proposed to be built by 2025 from sites identified in the new Local Plan and any other adopted plans (like the Cranbrook Plan or 'made' Neighbourhood Plans). This is the preferred option.

Option 2 - Same as Option 1 but also including an estimate for houses that could be built on other sites, not yet known, by 2025 ('windfalls').

Please provide any comments to explain your answer.

The responses to the question about setting housing requirement figures for Designated Neighbourhood Areas in the new Local Plan revealed a diverse range of opinions and concerns. Overall, more respondents expressed preferences for Option 1 (excluding windfalls) than Option 2 (including windfalls), and many raised broader issues about numbers and the housing allocation process. Common themes included infrastructure capacity, environmental protection, local needs, and the desire for a more nuanced approach to housing

requirements. There was a notable emphasis on ensuring that any method chosen takes into account the specific circumstances and constraints of individual areas.

Key points raised, in order of frequency:

- Infrastructure concerns
 - Housing allocations should consider existing infrastructure capacity
 - Concerns about roads, schools, healthcare, and sewage systems
- Preference for Option □ (excluding windfalls)
 - Viewed as more reliable and robust/controllable. Many acknowledging that windfalls would be difficult to predict with any degree of certainty for neighbourhood area geography.
- Preference for Option □ (including windfalls)
 - Seen as more realistic/complete and more reflective of overall Plan strategy and expected actual housing delivery.
- Questioning overall housing targets
 - Challenges to the basis for housing targets
 - Suggestions that targets may be too high or inappropriate for the area – conversely development industry responses advocating higher numbers for some settlements and calls to ensure those in hierarchy make their fullest possible contribution.
- Local needs and affordability focus
 - Importance of prioritising truly affordable housing for local residents
- Respect for Neighbourhood Plans
 - Emphasis on adhering to existing Neighbourhood Plans developed by local communities
- Environmental and landscape protection
 - Concerns about impacts on greenfield sites, wildlife, and landscape character
- Brownfield development priority
 - Advocacy for focusing on brownfield sites before greenfield development
- Flexibility in planning
 - Need for adaptability in long-term planning to accommodate changing circumstances
- Consideration of empty properties and second homes
 - Need to address empty properties
 - Concerns about the impact of second homes/holiday lets
- Improved assessment of local conditions
 - Suggestions for more detailed analysis of each area's specific needs and constraints
- Concerns about specific allocations
 - Objections to proposed development sites or allocations – as well as some further promotion of currently rejected sites as being suitable.

In terms of alternative methodologies, few were explicitly proposed. There were more general calls for the figures to reflect local needs and circumstances, including physical and infrastructure constraints/capacity, rather than supply-side sources. One specific call for apportionment methods (rather than supply-side) to be used – either using a simple apportionment method based on broad percentage growth figures for settlement tiers, or a more complex method based on matters referred to in the NPPF as being relevant considerations including spatial strategy, population and areas of assets of particular importance.

Do you have any other comments on Designated Neighbourhood Area Housing Requirements?

The responses to the question about Designated Neighbourhood Area Housing Requirements reveal significant concerns among respondents regarding the scale, location, and impact of proposed housing developments in East Devon. Many respondents expressed worries about infrastructure capacity, preservation of local character, and the need for affordable housing. There were also criticisms of the allocation process and calls for greater consideration of local needs and existing neighbourhood plans.

Key points raised, in order of frequency:

- Infrastructure concerns
 - Inadequate roads, schools, healthcare facilities, and utilities
 - Need for infrastructure improvements before new housing
- Preservation of local character and environment
 - Protection of green spaces and rural landscapes
 - Concerns about overdevelopment and loss of village/town identity
- Affordable housing needs
 - Priority for local residents and young people
 - Concerns about house prices being too high for locals
- Respect for existing Neighbourhood Plans
 - Calls for EDDC to honour locally developed plans
 - Criticism of top-down allocation approach
- Sustainability and environmental concerns
 - Flooding and drainage issues
 - Need for sustainable development practices
- Disproportionate allocation concerns
 - Some areas feeling unfairly burdened with housing requirements
- Traffic and transport issues
 - Worries about increased congestion
 - Need for improved public transport
- Local employment opportunities
 - Concerns about lack of local jobs for new residents
- Second homes and holiday lets
 - Suggestions for restrictions on non-primary residences

□□ Brownfield site development priority

- Calls to prioritise development on previously used land

Numerous responses from the development industry welcoming, and stressing the importance of, the proposed inclusion of wording in policy to make it clear that the figures are minimums and not upper limits. Similarly, general overall support for the proposal not to rely on neighbourhood plans making allocations to deliver the minimum District housing requirement but for these to be a source of additional supply. However, some concerns expressed that NPs would be disincentivised from making allocations. Many calls for ensuring robust monitoring and prompt action, including clarity on what this would be, to address under-delivery, including if neighbourhood plans fail to deliver housing sites allocated in their plans. Specific suggestions for consideration in determining the details of the final approach and numbers to be incorporated into the Publication Plan included:

- Several reports of possible errors/discrepancies in the figures at this draft stage.
- Suggestion to consider including an uplift/headroom figure beyond the allocations, which could help with achieving windfall predictions and encourage neighbourhood plans to allocate.
- Request for the table of DNAHR figures to be more than a table of housing supply components and to include a column for the residual requirement to be planned for in each neighbourhood plan, even though this may be zero.
- Request for reconsideration of how Cranbrook expansion figures are presented in order to show them as a commitment for Cranbrook – and not individual DNAs.
- Geographic anomalies – several queries, citing examples, as to whether it is an accurate representation to include housing numbers on one DNA where an allocation relates directly to expansion of settlements in an adjoining DNA/parish.
- Clarification sought as to whether provision in made NP policy for specific numbers of dwellings e.g. self-build units over the plan period but without specific site allocations are / should be included within the figures.

Statutory organisations summary

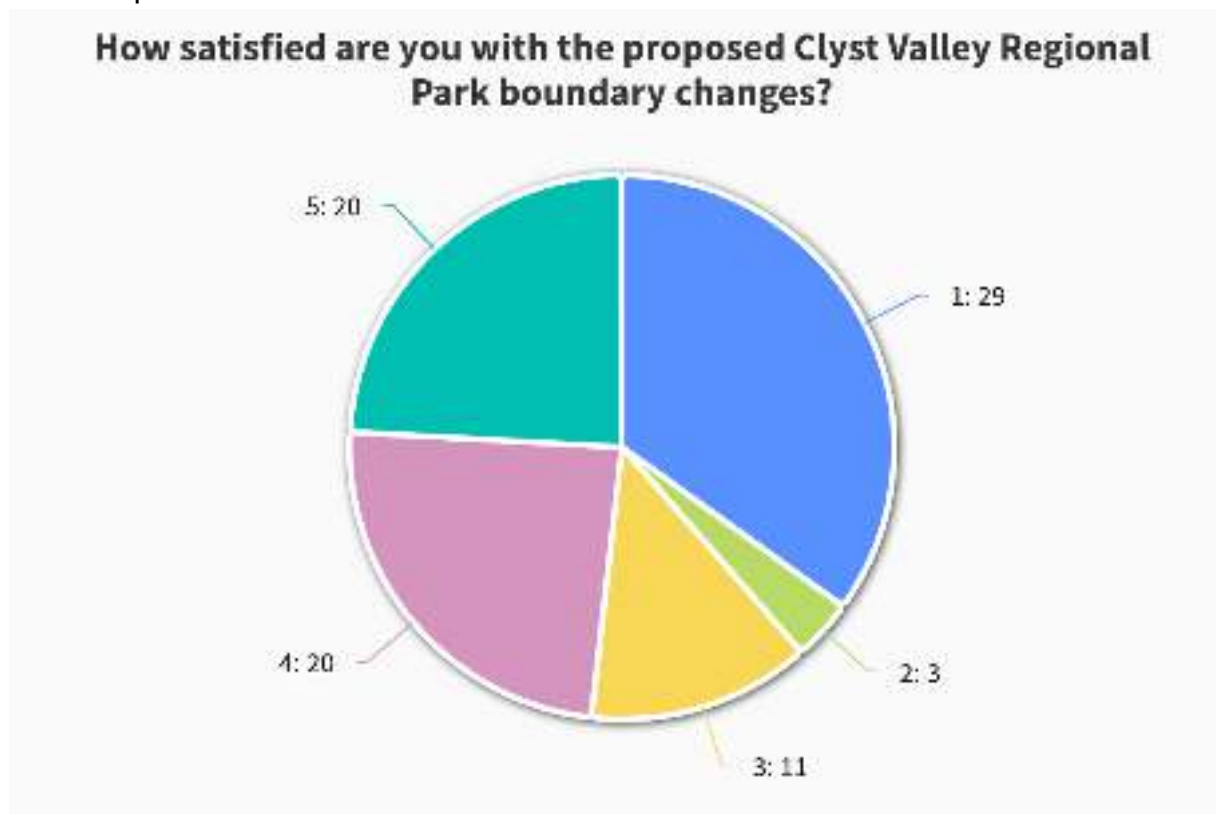
NHS Devon Integrated Care Board

Only one statutory body, off those named as statutory consultees in the town and country planning legislation, responded to this part of the consultation. This was the NHS. The comment advised that from the perspective of access to healthcare it cannot be possible to rate ‘+’ for either option. The reason given, which relates more to overall housing numbers and infrastructure than this topic per se, was that with the majority of housing proposed for the Western side of the council area and the GP surgeries that serve this area already operating without sufficient capacity to meet the current demands, any proposed expansion or

residential dwellings needs to have a fully funded policy that will allow the required expansion of primary care infrastructure capacity.

9. Clyst Valley Regional Park

Total responses: 83



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Clyst Valley Regional Park boundary changes show a mix of opinions, with many expressing support for the expansion and protection of green spaces. However, there are also concerns raised about specific aspects of the plan, particularly regarding the proposed Gypsy and Traveller site, the impact on existing businesses, and the perceived relationship between the park and proposed housing developments. Some respondents suggest further extensions or modifications to the boundary, while others question the overall effectiveness of the plan.

Key points raised, in order of frequency:

- Support for park expansion and green space protection
 - Appreciation for increased green space and recreational areas
 - Recognition of benefits for wildlife and biodiversity

- ☐ Concerns about proposed Gypsy and Traveller site
 - Worries about potential antisocial behaviour
 - Concerns about location and impact on local infrastructure
 - Lack of up-to-date evidence to justify allocation
- ☐ Impact on existing businesses and land use
 - Objections to inclusion of operational business land within park boundaries
 - Requests for boundary modifications to protect economic interests
- ☐ Suggestions for further expansion or modification
 - Proposals for additional green corridors and buffer zones
 - Recommendations for connecting to other protected areas
- ☐ Relationship between park and housing developments
 - Mixed views on park's role in relation to new housing proposals
 - Concerns about park being used to justify unwanted development
- ☐ Questions about effectiveness and implementation
 - Doubts about funding and delivery of park plans
 - Concerns about infrastructure capacity and sustainability
- ☐ Positive impact on local communities and wellbeing
 - Recognition of park's potential benefits for residents' health and quality of life
- ☐ Requests for clarity and better consultation
 - Complaints about lack of clear information or direct communication with affected property owners
- ☐ Environmental and biodiversity concerns
 - Emphasis on need for habitat protection and biodiversity enhancement
- ☐☐ Traffic and accessibility issues
 - Concerns about increased traffic in certain areas
 - Suggestions for improved pedestrian and cycle access

The consultation was in respect to a proposed expansion of the Clyst Valley Regional Park, with an expansion proposed from that identified in the existing adopted local plan, though there were also some limited minor removals of parts of the existing designated area.

There were around 50 Individuals/organisations that commented on the Clyst Valley Regional Park element of the consultation with a range of views expressed from those that gave full or qualified support for park expansion (most respondents did) through to those whose comments opposed to expansion. This part of the consultation also generated a number of comments in respect of potential for a gypsy and traveller site at Langaton Lane, these comments are reported on elsewhere in this report.

Statutory organisations summary

Devon County Council

Historic Environment welcome the proposed extensions to the Clyst Valley Country Park and will help to conserve many areas of archaeological and historic landscape value.

Highways state that development in or adjacent to the Clyst Valley Regional Park will be expected to contribute towards the delivery of the Clyst Valley Trail, a proposed multi-use trail between Topsham and West Clyst. Development in the vicinity of the Clyst Valley Trail should provide appropriate access onto the Trail. The allocation of land as part of the Clyst Valley Regional Park should not prevent the construction of the Trail through said land.

Minerals and Waste note that part of the expansion area is within a Mineral Consultation Area for an asphalt plant in Hill Barton Industrial Park, and Waste Consultation Zones for the waste facilities located at both Hill Barton and Greendale Barton. It is considered the proposed use will not place any additional constraint on the mineral or waste uses, therefore, there is no objection from the Waste and Minerals Planning Authority.

The Environment Agency

Welcome the proposal to expand the park. They note it represents a great opportunity to achieve good ecological status for the River Clyst, but advise challenges to achieve this are huge.

Teignbridge District Council

See the park extension as an important component in relation to the proposal for a new community with enhancement to visitor infrastructure needed. The park and proposal will provide scope for managing otherwise adverse impacts in respect of habitat mitigation.

Exeter City Council

Welcome the proposal to expand the park and invite further discussions regarding complimentary areas identified in the Exeter Plan.

Historic England

Broadly supports Strategic Policy 16 (Green Infrastructure and Clyst Valley Regional Park)

Particularly supports conservation of heritage assets/settings and landscape character maintenance at Killerton.

Notes numerous heritage assets within/around proposed extensions.

Anticipates extensions will generally benefit conservation of asset settings.


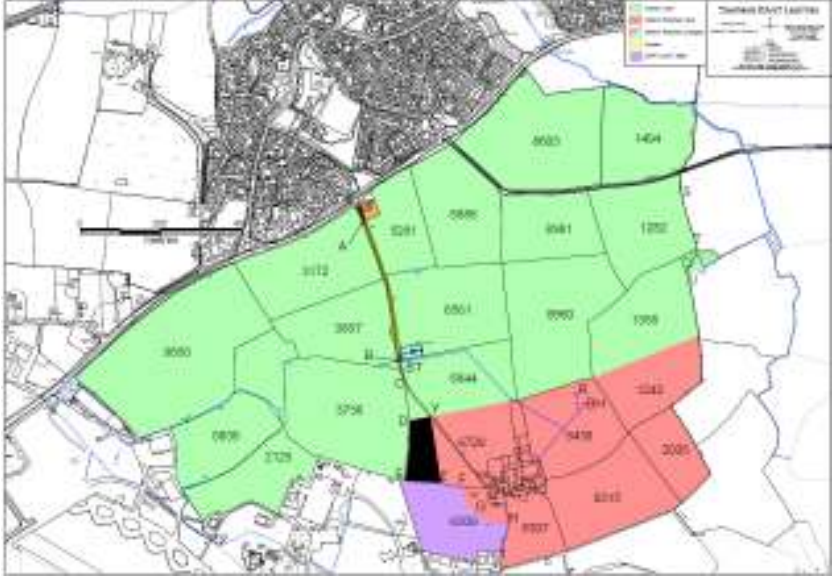
Identifies potential conflicts with visitor infrastructure affecting assets/settings.

Believes draft policy framework adequate for impact management and enhancement.

Specifically supports addition of Poltimore Park areas.

Welcomes inclusion of Rockbeare Manor Grade II Registered Historic Park and Gardens.

There were a number of respondents that did not want to see land that they own, use or may have a longer-term interest in included in the park. These included, with plan extract showing relevant area/s (please note extracts are taken from their submission):

<p>Ref 083 – owners of Higher Burrowton Cottage, Broadclyst who advised their land forms a small holding and they do not want it included in the park</p>	
<p>Ref 088 (and also see Ref 114) – Agents for owners of Treasbeare consider that the Clyst Valley Regional Park should not include land at Treasbeare and revert to its former boundary. They are seeking to accommodate Devon Air Ambulance Trust development on part of the park and also they are of the view that an indicative rather than prescriptive boundary for the park should be defined. It should be noted that an agent, Ref 127, also raised the same concerns for Devon Air Ambulance Trust.</p>	

Ref 114 - Agents promoting a strategic scale development south of the A3052 object to inclusion of small area of land in the park where they advise a road access is required

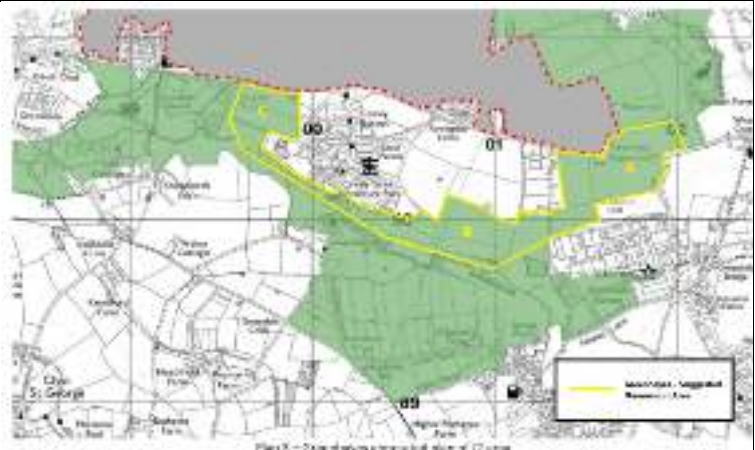


Potential Access

Ref 209 – Agents acting for Greendale raise objection to inclusion of the park in areas of land shown as areas A and C on the plan alongside. But see are B as compatible with their development proposals. They raise concerns however around:

- ✦ Lack of prior engagement with landowners of land in the park; and
- ✦ Lack of objective evidence and assessment to inform areas for inclusion in the park.

The principle of park provision is generally supported.



Ref: 126 - Objection to the southward extension of the park boundary to include land at Darts Farm, Topsham, Clyst St George, Exeter EX30QH was objected to. It was advised

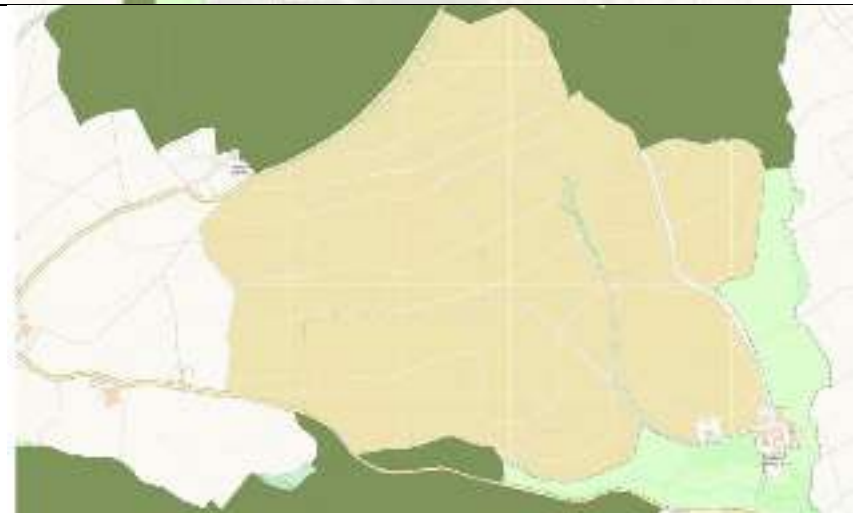
that Darts Farm is home to a wide range of businesses and the land in question is used for a range of activities and inclusion will curtail existing functions. The respondent suggested an alternative boundary and advised of support for the Clyst Valley Trail through their land.



Ref 186b National Trust requests that the following area not be included. They state that they are advanced stages developing other projects which are important to the delivery of our strategy, and therefore this land is not available for inclusion in the CVRP expansion.



The National Trust suggest that in substitution of the above omission of land, they would offer the area shaded in yellow (Figure 2) for inclusion in the CVRP boundary review. The area of land offers a number of positive connectivity opportunities between the existing and extended CVRP.



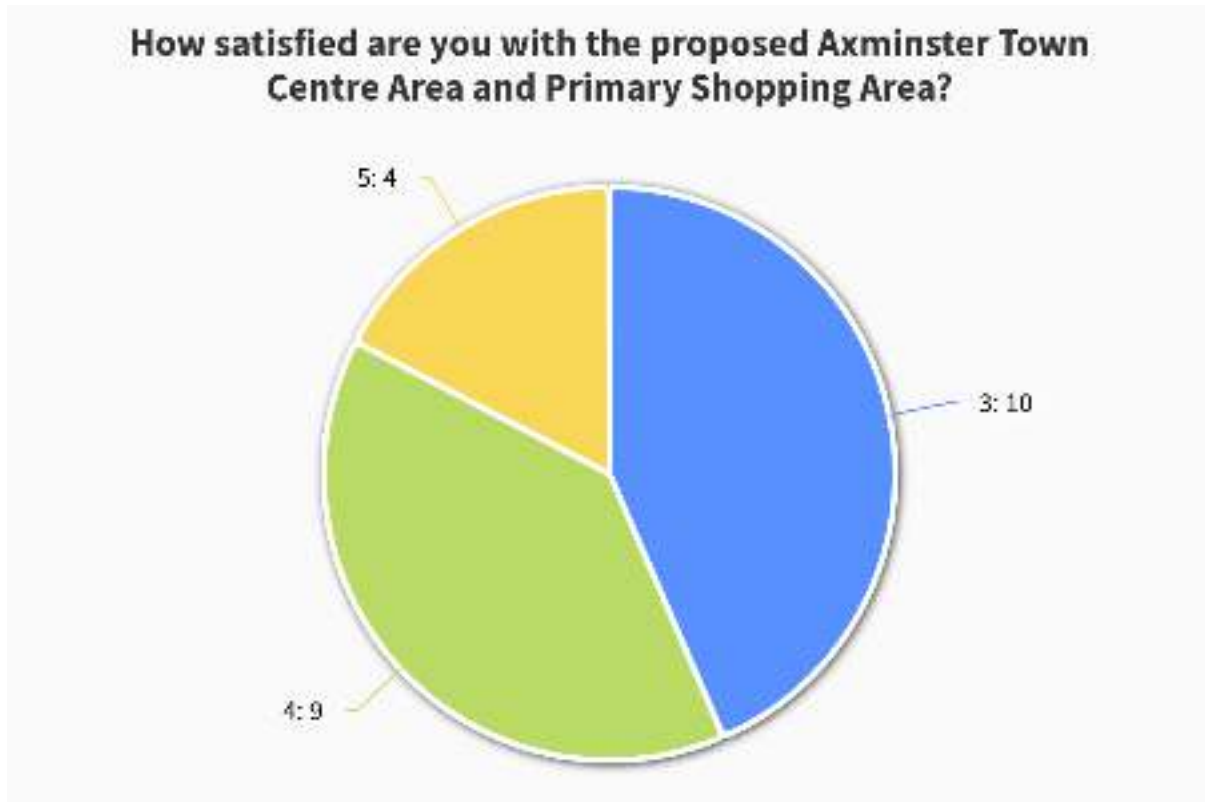
A map of the relevant area was not supplied but an agent acting for landowner Mr Andrew Cork objected to inclusion of land Newcourt Barton, Cyst Rd, Exeter EX3 0DB which comprises of an established business park of predominantly industrial units and yard spaces. It is requested that the land is removed.

A location map was not provided but a respondent advised - This boundary change appears to be intended to encompass half of my property including my out buildings, greenhouse and stables. Once again the 'consultation' process does not appear to be consulting us, the owners of the property.

10. Town Centre Retail Areas

Axminster

Total responses: 23



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Axminster Town Centre Area and Primary Shopping Area reflect a mix of opinions, with several concerns raised about the current state of shopping in the town. Many respondents highlight the need for improvement and revitalization of the town centre, with particular emphasis on the loss of shopping areas and the impact of larger supermarkets. There are also suggestions for enhancing the town's appeal through environmental improvements and addressing parking issues.

Key points raised, in order of frequency:

- Decline in shopping areas
- Loss of shopping areas in the town centre

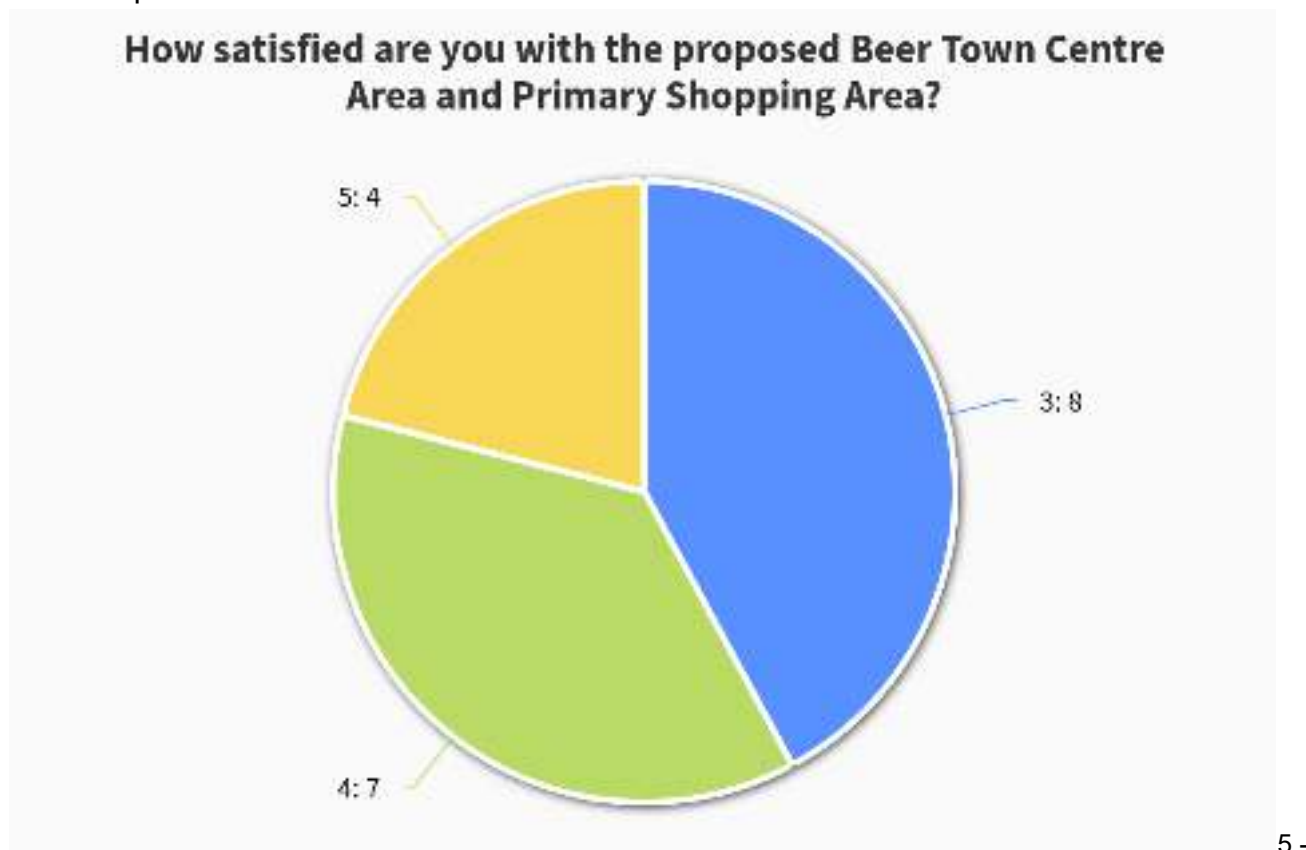
- Need for more diverse shopping options
- Impact of Tesco development on local shops
- ☐ Need for town centre improvements
 - Suggestions for revitalisation of the town centre
 - Desire for more attractive and functional spaces
- ☐ Parking and traffic concerns
 - Severe parking problems in the town centre
 - Traffic issues related to deliveries and redevelopment
- ☐ Environmental enhancements
 - Prioritisation of trees and shade in the town centre
 - Incorporation of natural drainage systems
- ☐ Impact of large supermarkets
 - Influence of Tesco on local shopping patterns
 - Concerns about expansion and adherence to planning restrictions
- ☐ Business rate concerns
 - Need for lower business rates to support local businesses
 - Call for better engagement between councils and businesses
- ☐ Online shopping competition
 - Need to address balance between town centres and online selling
- ☐ Support for current layout
 - Reflection of current usage in the proposed areas
- ☐ Suggestions for improvement
 - Proposal for a market to help local businesses
 - Need to encourage people into the town centre

Statutory organisations summary

None

Beer

Total responses: 19



Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Beer Town Centre Area and Primary Shopping Area are generally positive, with respondents appreciating the current character and offerings of Beer. However, there are some suggestions for improvements and concerns about future growth and sustainability. The comments touch on various aspects, including the village's appeal, environmental considerations, and broader issues affecting town centres.

Key points raised, in order of frequency:

- Satisfaction with current layout and usage
 - Reflection of current usage in the proposed areas
 - Appreciation for Beer's existing character and offerings
- Environmental enhancements
 - Suggestion to prioritise trees and shade in the town centre

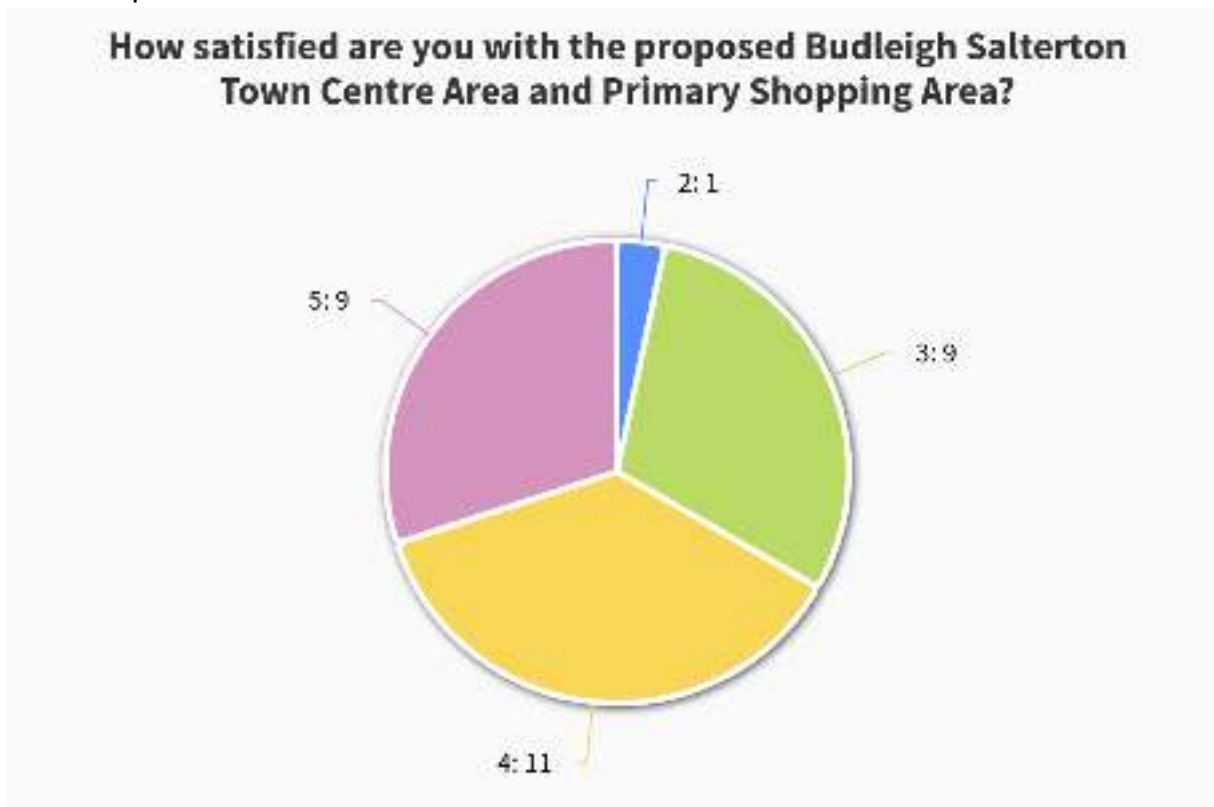
- Incorporation of natural drainage systems
- Limited room for growth
 - Concern about lack of space for future expansion
- Business and economic considerations
 - Need to address balance between town centres and online selling
 - Call for lower business rates to support local businesses
- Positive attributes of Beer
 - Recognition of Beer as a popular and well-supported village
 - Appreciation for local amenities (beach, pubs, restaurants)

Statutory organisations summary

None

Budleigh Salterton

Total responses: 30



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Budleigh Salterton Town Centre Area and Primary Shopping Area reveal mixed feelings. While some respondents are satisfied with the current layout, others express concerns about empty shops and the need for adaptation. There's a strong emphasis on preserving the town's unique character while also addressing challenges faced by local businesses.

Key points raised, in order of frequency:

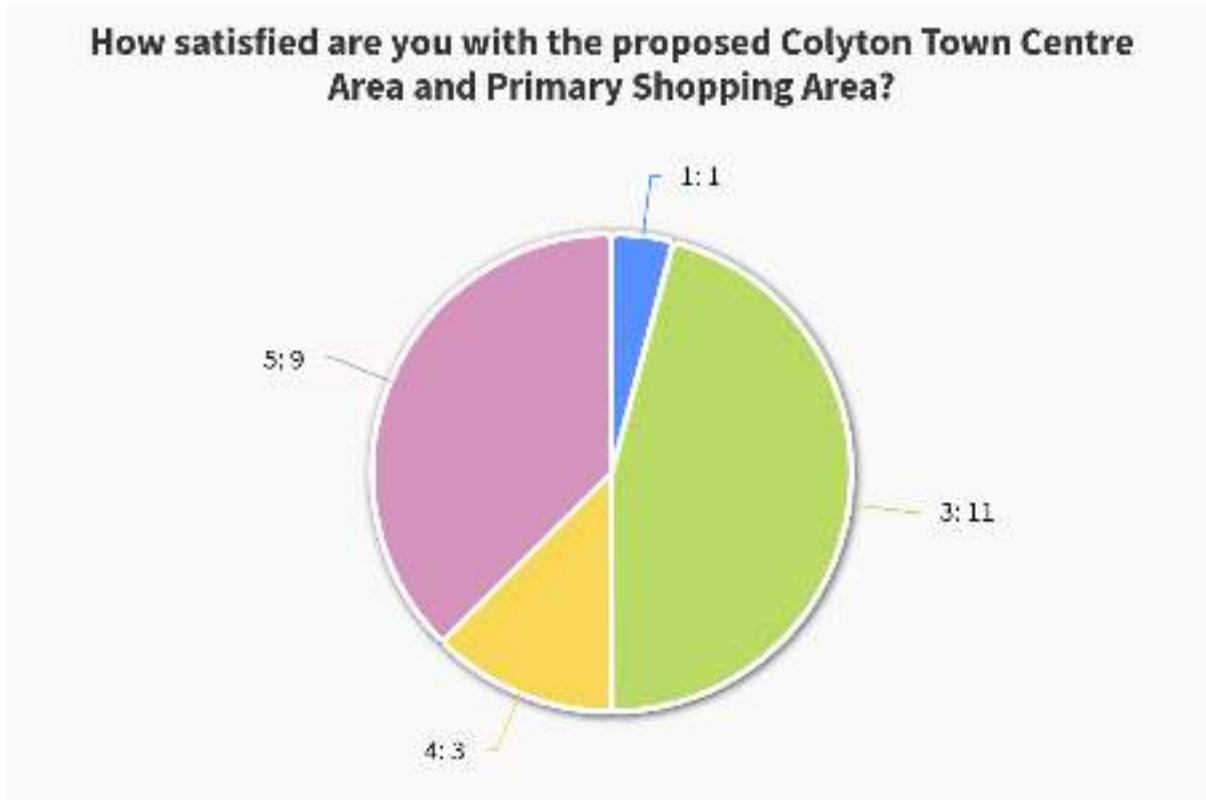
- Preservation of town character
 - Desire to maintain Budleigh's unique charm and layout
 - Satisfaction with current town centre arrangement
- Concerns about empty shops and retail decline
 - Noticeable increase in vacant retail spaces
 - Suggestion to ease conversion of shops to residential use
- Planning and development issues
 - Calls for faster decision-making on commercial applications
 - Criticism of delays in approving new developments (e.g., Old Sorting Office)
- Environmental improvements
 - Suggestion to prioritise trees, shade, and natural drainage in the town centre
- Parking and accessibility
 - Importance of maintaining easy parking and vehicle access for trade

Statutory organisations summary

None

Colyton Town Centre

Total responses: 24



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Colyton Town Centre Area and Primary Shopping Area show a mix of satisfaction with the current layout and frustration with the proposal process. While some respondents agree with maintaining the existing retail area, others express concerns about the utility of the proposal and the quality of local shopping options.

Key points raised, in order of frequency:

- Satisfaction with current layout
 - Agreement that the existing retail area should remain the same
 - Recognition that the proposal reflects current usage
- Criticism of the proposal process
 - Frustration with proposing what already exists

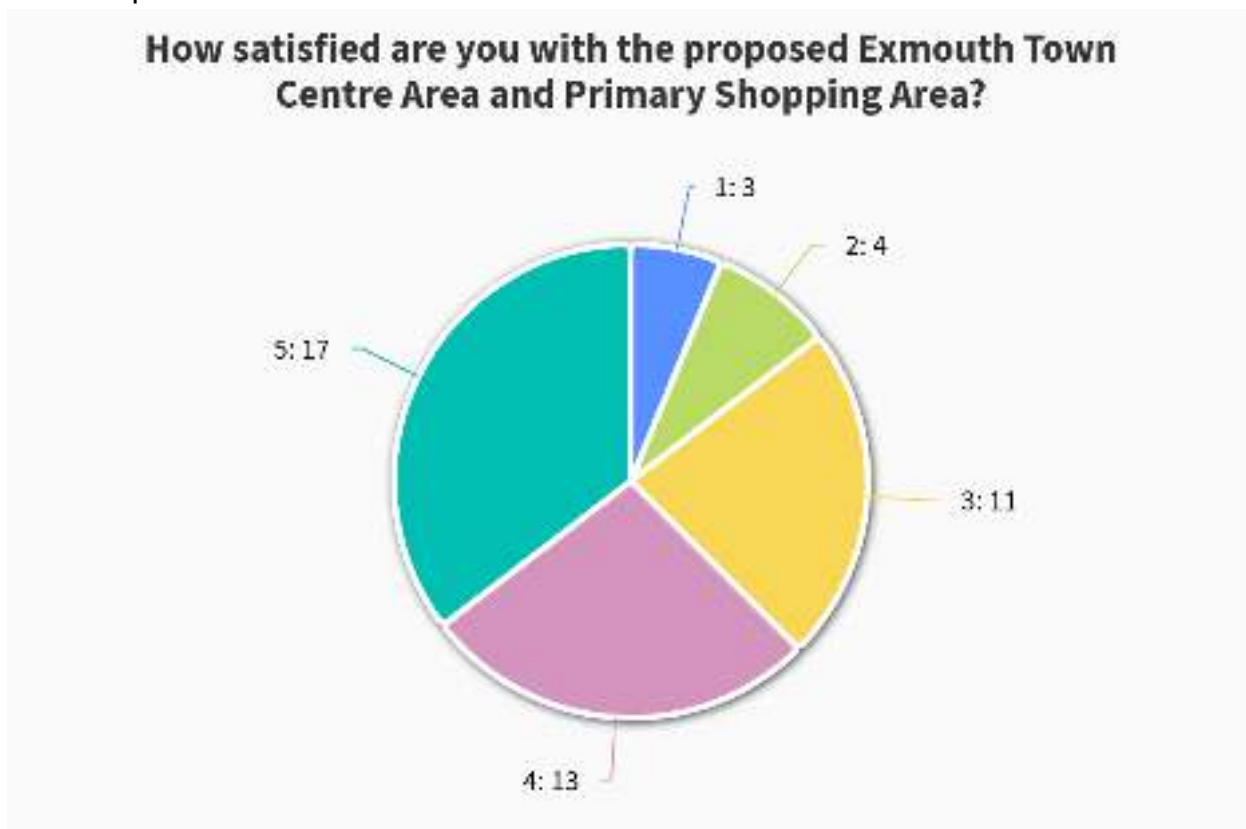
- Concern about time and money spent on the proposal
- Suggestions for alternative improvements
 - Call to keep public toilets open
 - Recommendation to focus on road resurfacing in the town centre
- Concerns about local shopping options
 - Lack of decent convenience stores
 - Poor selection of produce
- Local government agreement
 - Colyton Parish Council's support for maintaining the existing retail area

Statutory organisations summary

None

Exmouth Town Centre

Total responses: 48



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Exmouth Town Centre Area and Primary Shopping Area reveal a general dissatisfaction with the current state of the town centre. Many respondents express concerns about the dated appearance, lack of variety in shops, and the need for significant improvements. There are also suggestions for redevelopment, environmental enhancements, and a call for better engagement with property owners and businesses.

Key points raised, in order of frequency:

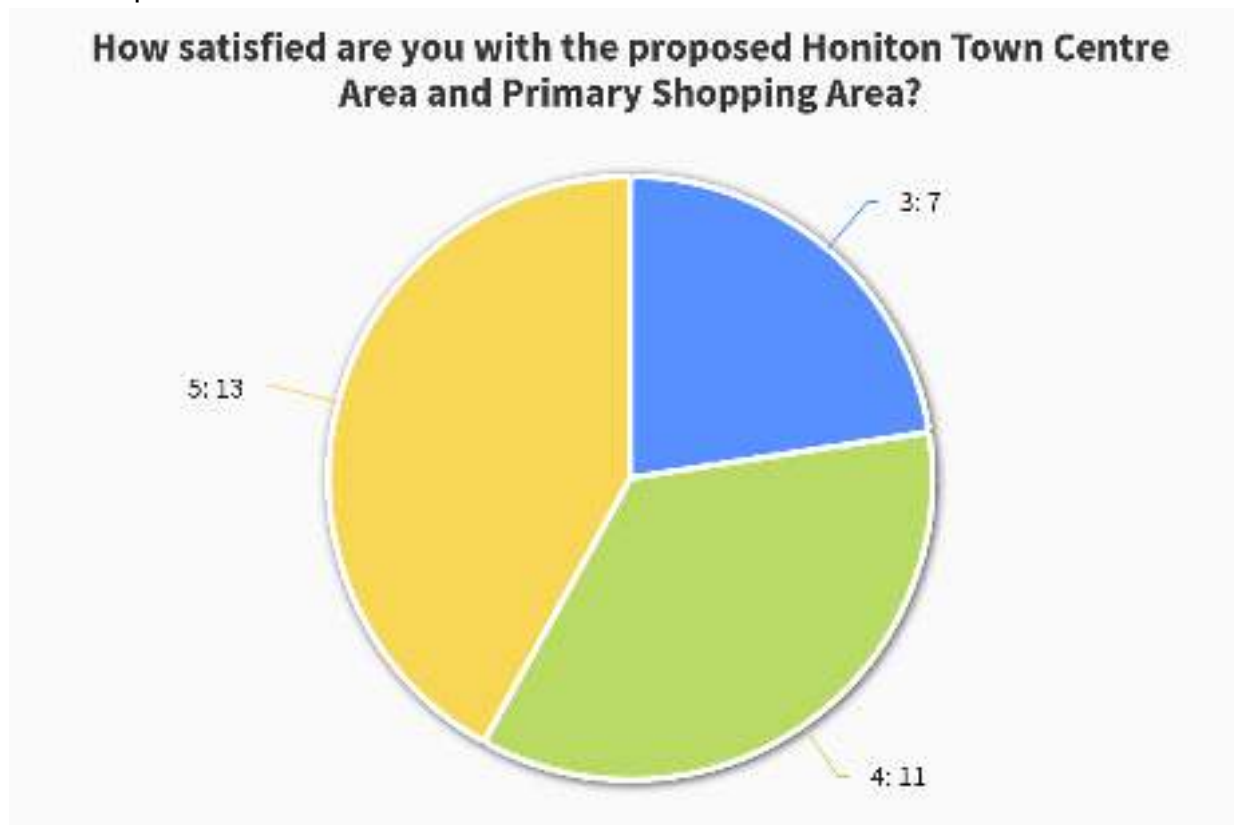
- Need for improvement and modernisation
 - Town centre described as run-down, dated, and lacking appeal
 - Specific concerns about the Magnolia Centre's appearance and maintenance
 - Calls for updating and redeveloping key areas, including the former post office site
- Suggestions for environmental enhancements
 - Recommendations for more trees, planting, and natural drainage
 - Desire to minimise concrete and improve overall aesthetics
- Retail and business concerns
 - Recognition of changing shopping habits and increase in online shopping
 - Need for more variety in local independent shops
 - Suggestions to allow conversion of long-term empty shops to residential use
- Housing and residential development
 - Proposals to encourage residential development in certain areas
 - Suggestions for mixed-use developments with residential units above shops
- Concerns about area coverage
 - Disagreements about which areas should be included or excluded from the town centre designation
 - Suggestions to include or exclude specific areas like the train station, bus stops, and harbour
- Investment and engagement
 - Calls for investment in the town centre area
 - Need for better engagement with property owners and businesses
 - Concerns about high business rates
- Specific improvement suggestions
 - Ideas for improving the Strand area, underpass, and signage
 - Prioritising town centre improvements over seafront development

Statutory organisations summary

None

Honiton Town Centre

Total responses: 31



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Honiton Town Centre Area and Primary Shopping Area show a mix of opinions. While some respondents are satisfied with the current layout, others suggest improvements and express concerns about the viability of town centre retail. There's a focus on balancing retail needs with housing demands and addressing broader economic challenges facing town centres.

Key points raised, in order of frequency:

- Retail concentration and vacant units
 - Preference for keeping retail focused on the High Street
 - Concern about empty units and suggestions for their use
- Mixed-use development proposals
 - Suggestion for integrating residential accommodation above retail spaces
- Economic challenges for town centres
 - Need to address competition from online shopping

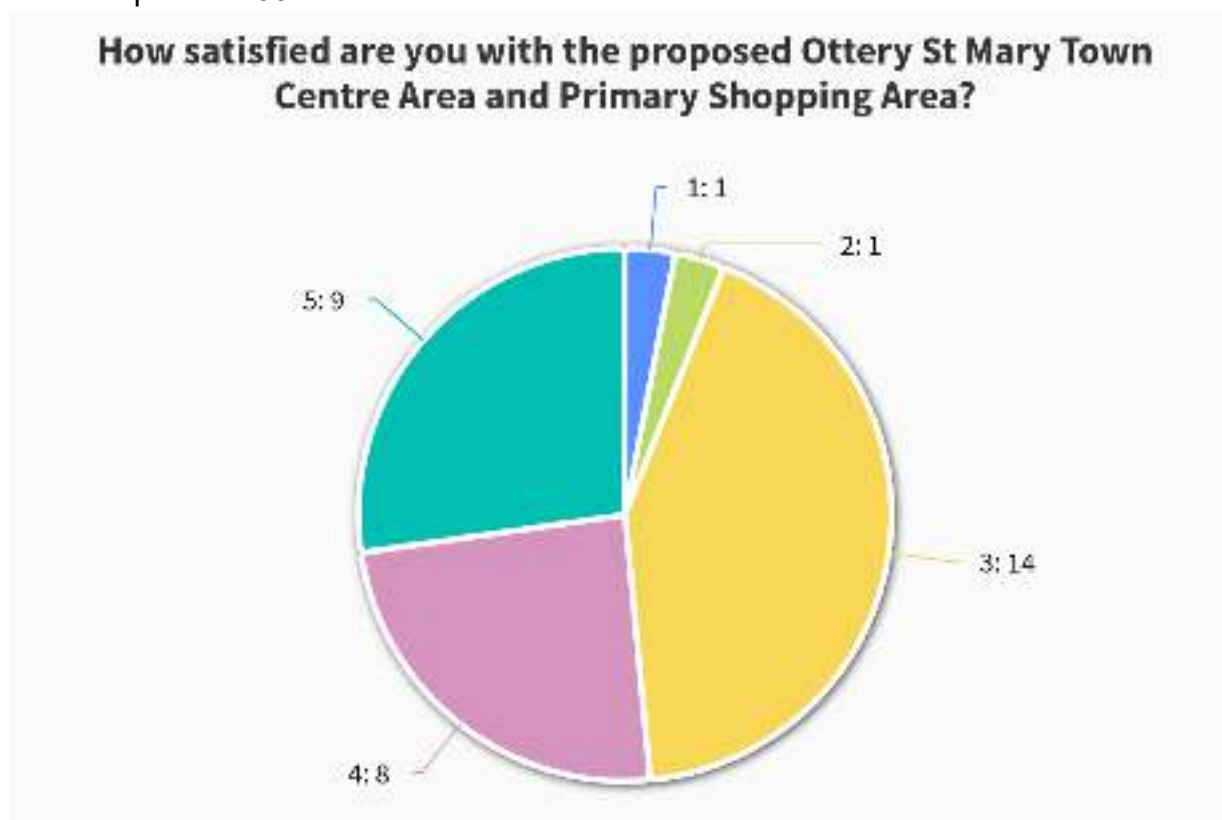
- Call for lower business rates and better council engagement with businesses
- Satisfaction with current layout
 - Recognition that the proposal reflects the existing town centre
 - Honiton Town Council's approval of the representation

Statutory organisations summary

None

Ottery St Mary

Total responses: 33



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Ottery St Mary Town Centre Area and Primary Shopping Area reveal a mix of opinions, with several suggestions for boundary adjustments and concerns about the town centre's future viability. There's a focus on

protecting and supporting local businesses while also considering mixed-use development opportunities.

Key points raised, in order of frequency:

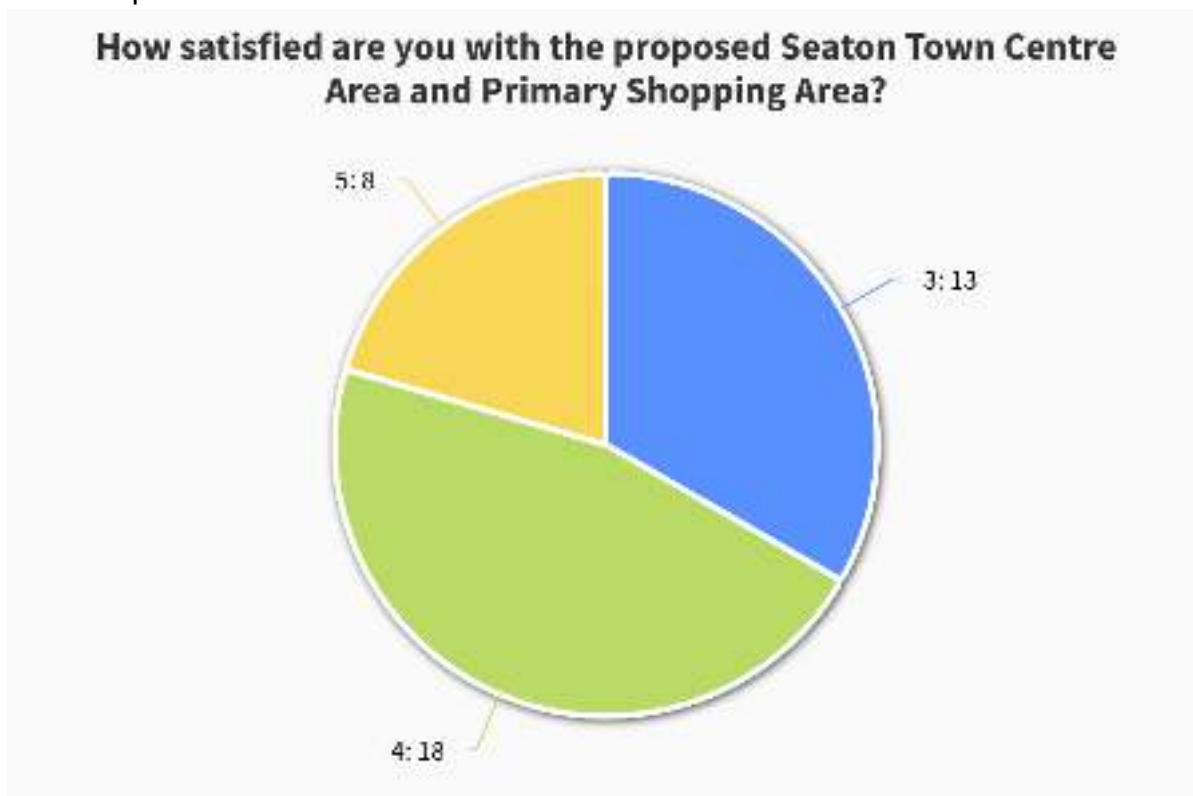
- Boundary adjustment suggestions
 - Proposals to extend or modify the town centre and primary shopping area boundaries
 - Specific mentions of including more of Mill Street, Yonder Street, and certain pubs
- Economic challenges and support for local businesses
 - Need for a forward-looking plan to prevent decline
 - Calls for lower business rates and better council engagement with businesses
 - Preference for supporting small, independent traders
- Mixed-use development proposals
 - Suggestion for integrating residential accommodation above retail spaces
- Preservation of town character
 - Importance of maintaining the town's unique character while supporting development

Statutory organisations summary

None

Seaton

Total responses: 39



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Seaton Town Centre Area and Primary Shopping Area reveal significant concerns about the town's retail landscape. Many respondents highlight issues with the current layout, particularly the split caused by the Tesco development, and express worries about potential out-of-town developments further impacting the town centre. There's a strong desire for revitalisation and support for local businesses.

Key points raised, in order of frequency:

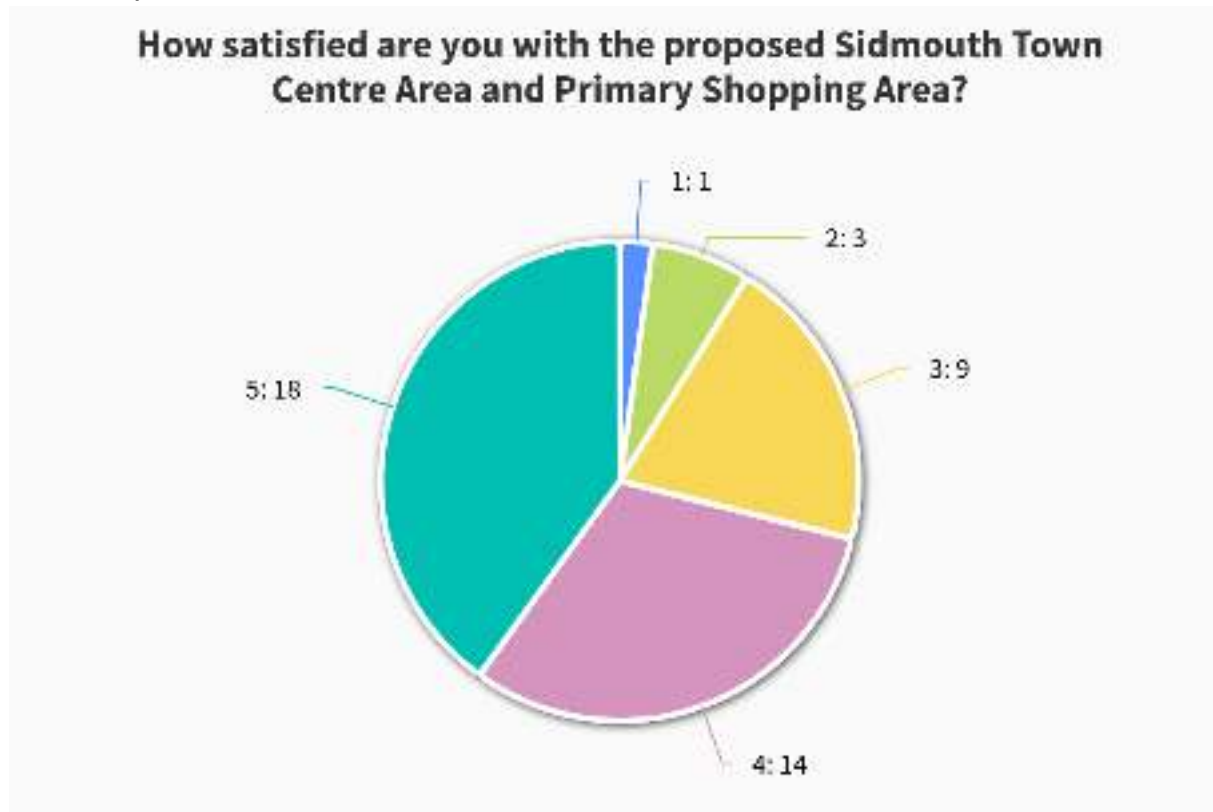
- Impact of out-of-town developments
 - Concerns about proposed retail units destroying the town centre
 - Negative effects of the Tesco development on town centre footfall
 - Opposition to further out-of-town retail parks
- Need for town centre revitalisation
 - Calls for reshaping and better defining the town centre retail area
 - Suggestions for introducing a market to help local businesses
 - Desire for more variety in shops
- Split shopping area concerns
 - Recognition of the disjointed nature of Seaton's shopping area
 - Need to address the divide created by the Tesco development
- Mixed-use development proposals
 - Suggestion for integrating residential accommodation above retail spaces
- Boundary adjustment suggestions
 - Proposals to include specific areas like Harbour Road and the old station frontage

Statutory organisations summary

None

Sidmouth

Total responses: 45



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Sidmouth Town Centre Area and Primary Shopping Area show a mix of satisfaction and concerns. While some respondents are content with the current layout, others suggest improvements and express worries about the challenges facing town centres in general. There's also a focus on the need for better integration of the seafront area and support for local businesses.

Key points raised, in order of frequency:

- Satisfaction with current layout
 - Recognition that the proposal reflects current usage
 - Some respondents feel Sidmouth is fine as it is
- Concerns about out-of-town developments
 - Warning against building units for national chains outside the town centre
- Need for improvements and maintenance
 - Suggestions for improving building frontages in certain areas

- Mixed-use development proposals
 - Suggestion for integrating residential accommodation above retail spaces

Statutory organisations summary

None

Other comments

Do you have any other comments on the Town Centre Retail Areas?

The responses to the question about Town Centre Retail Areas reveal a wide range of concerns and suggestions. Many respondents express worries about the decline of town centres, the impact of out-of-town developments, and the need for revitalisation. There are also comments about specific towns, parking issues, and the importance of supporting local businesses. Several respondents offer suggestions for improvements and policy changes.

Key points raised, in order of frequency:

- Concerns about out-of-town developments
 - Opposition to building units for national chains outside existing town centres
 - Warnings about the negative impact on town centre vitality
- Parking and accessibility issues
 - Calls for more affordable and accessible parking
 - Suggestions for park-and-ride facilities and pedestrianisation
- Support for local and independent businesses
 - Emphasis on the uniqueness of independent businesses in East Devon
 - Need for lower business rates and better council engagement
- Town-specific concerns and suggestions
 - Calls for redevelopment of specific areas (e.g., Magnolia Centre in Exmouth)
 - Suggestions for improvements in Axminster, Exmouth, and other towns
- Environmental and design considerations
 - Prioritisation of trees, shade, and natural drainage in town centres
 - Careful design to maintain existing character while allowing for expansion
- Classification and designation concerns
 - Questions about the classification of smaller settlements like Lypstone
 - Clarification needed on development policies for non-designated areas
- Adaptation to changing retail landscape
 - Need to address balance between town centres and online shopping
 - Recognition of declining demand for retail space and need for town centres to adapt
- Tourism and visitor economy
 - Concerns about declining visitor numbers and hotel accommodation
 - Need for policies to support tourism and attract higher-spending visitors
- Public realm and town centre attractiveness
 - Calls for investment in improving existing town centres
 - Concerns about declining maintenance and cleanliness of public spaces

Statutory organisations summary

Devon County Council

Support the overall policy. However, concerns arise about how this will be achieved through the proposed Tier 1 and Tier 2 retail areas. While encouraging sustainable transport, the importance of sufficient car parking for those travelling from further afield cannot be overlooked. To maintain vibrant town centres, a balance between these options is essential. Additionally, converting underused upper floors of shops into high-quality flats could benefit town centres by increasing footfall and supporting local businesses. To safeguard the long-term vitality of town centres, the policy must prioritise protecting core retail and leisure areas and implement strict controls on changes of use. This will prevent the gradual erosion of town centres and maintain their appeal to residents and visitors alike.

Historic England

Welcomes the policy's focus on enhancing town centres and the Council will seek opportunities to the natural and historic environment.

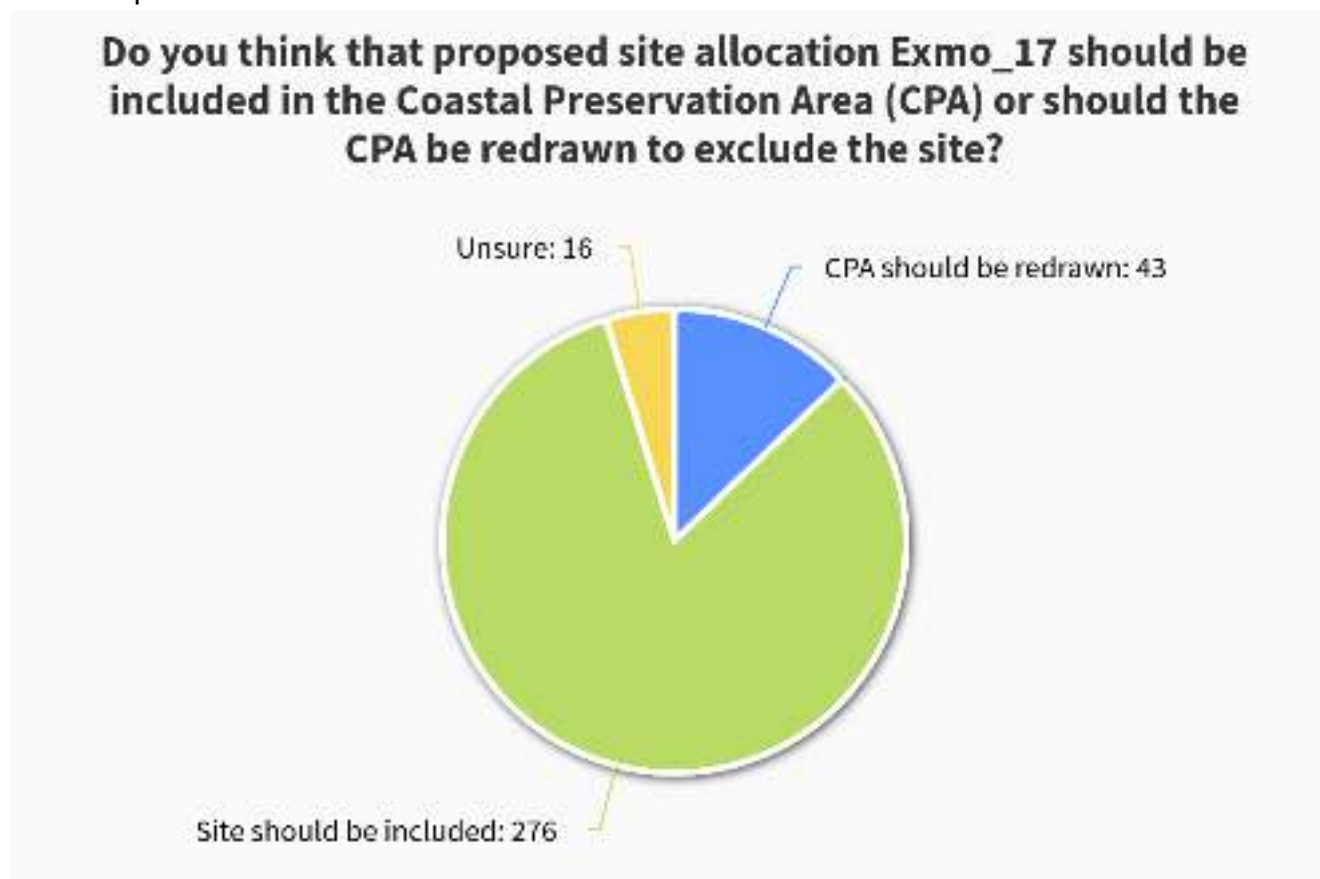
Dorset Council

Raised concerns about the East Devon Local Plan's potential impact on neighboring areas. Specifically, they believe that the plan should consider the influence of nearby settlements like Lyme Regis when determining town centre development.

11.Coastal Preservation Area

Exmo_17

Total responses: 335



Do you have any comments on Exmo_17 being within the proposed CPA?

The responses to the question about Exmo_17 being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development in this area. Respondents emphasise the importance of preserving the natural beauty, wildlife habitats, and recreational value of the site. Many raise concerns about infrastructure capacity, particularly regarding roads, sewage systems, and local services. There is a strong sentiment that the area's current designations as an Area of Outstanding Natural Beauty (AONB) and part of the CPA should be respected and maintained.

Key points raised, in order of frequency:

- Environmental and landscape protection
 - Preservation of wildlife habitats and biodiversity
 - Importance of maintaining the area's natural beauty
- Infrastructure concerns
 - Inadequate roads, schools, healthcare facilities, and sewage systems
 - Inability of current infrastructure to support additional housing
- Recreational value and public access
 - Importance of the cycle path and walking routes
 - Area's contribution to community well-being and mental health
- Opposition to development in CPA/AONB
 - Criticism of considering development in protected areas
 - Concern about setting a precedent for future development
- Local character and identity
 - Preservation of Littleham village character
 - Concern about Exmouth becoming overdeveloped
- Traffic and congestion issues
 - Worries about increased traffic on local roads
 - Existing congestion problems
- Flooding and drainage concerns
 - Site being on a flood plain
 - Potential impact on water management
- Support for inclusion in CPA
 - Calls for the site to be included or remain within the CPA
- Affordable housing needs
 - Preference for affordable or council housing if development occurs
- Confusion about the question or proposal
 - Some respondents found the question unclear or lacked information

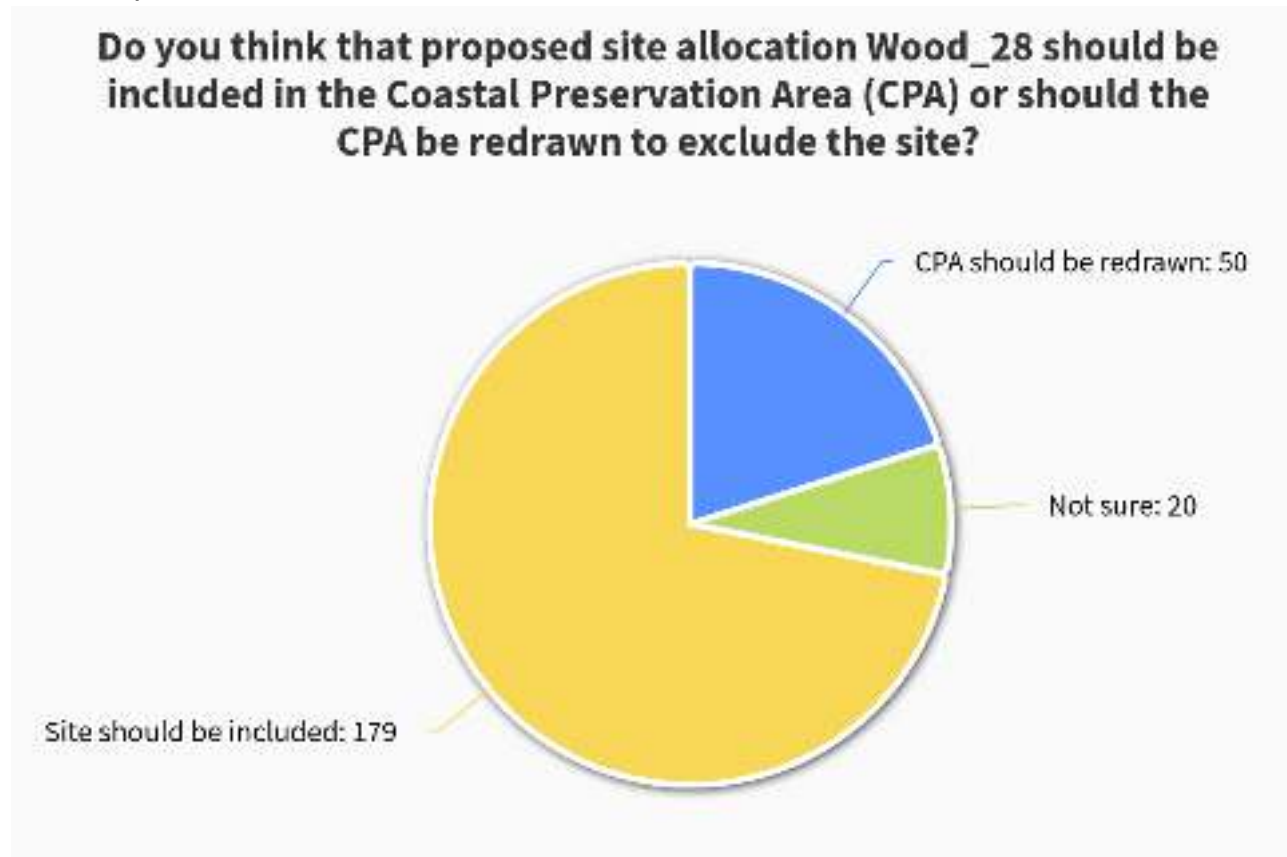
Statutory organisations summary

Historic England

While we welcome the proposed addition of land adjacent to Exmo_17 into the Coastal Protection Area, insofar as this could help to protect the setting of the Grade II* listed Parish Church of St Margaret and St Andrew and its grounds, the proposed boundary does not appear logical or consistent when considered in relation to the wider Coastal Preservation Area. We note that Exmo_17 is a second choice allocation and we suggest that a more logical and defensible boundary for the Coastal Protection Area should follow the line of the former Branch Railway / Budleigh cycle track. This would draw in the area with wooded field boundaries around Littleham Brook.

Wood_28

Total responses: 249



Do you have any comments on Wood_□□ being within the proposed CPA?

The responses to the question about site Wood_□□ being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development of this site. Respondents emphasise the importance of preserving the natural environment, wildlife habitats, and scenic value of the area, as well as concerns about the already strained infrastructure and services in the Exmouth and Lymington region. There is a strong sentiment that the CPA designation should be respected and maintained, with several calls to remove the site from consideration for development.

Key points raised, in order of frequency:

- Importance of Environmental and Landscape Protection
 - Preserving the natural habitats and ecosystems of the coastal area
 - Maintaining the scenic beauty and character of the landscape
- Concerns about Infrastructure and Service Capacity
 - Roads already experiencing heavy congestion
 - Overstretched schools, healthcare facilities, and other local services

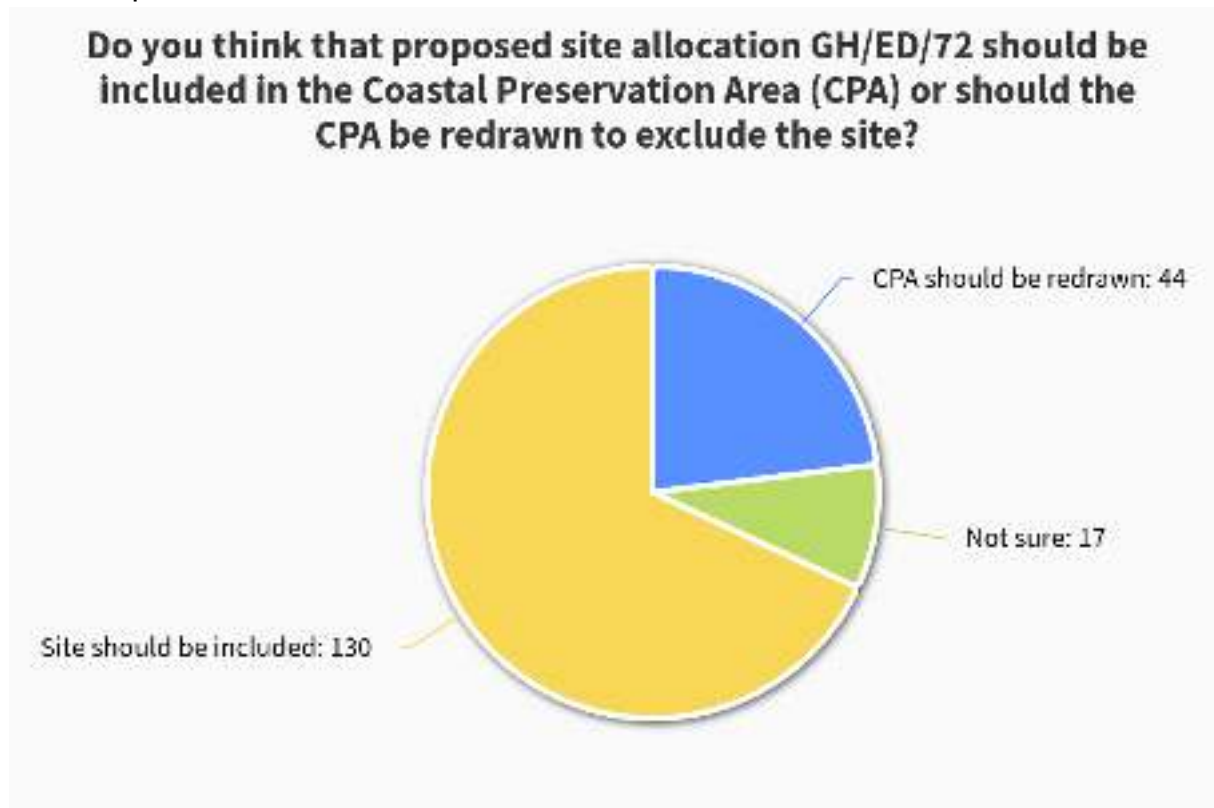
- ❑ Objections to Development within the CPA
 - Questioning the rationale for considering development in a protected area
 - Calls to respect the established CPA boundaries and restrictions
- ❑ Preference for Prioritising Brownfield and Infill Development
 - Suggestions to focus new housing on underutilised sites within urban areas
 - Concerns about the loss of valuable farmland and open spaces
- ❑ Concerns about Impacts on Wildlife and Biodiversity
 - Potential negative effects on the Exe Estuary's sensitive ecosystems and migratory birds
- ❑ Acknowledgment of the Site's Sustainable Location
 - Recognition of the site's accessibility and proximity to public transport options

Statutory organisations summary

None

GH/ED/72

Total responses: 191



Do you have any comments on GH/ED/□□ being within the proposed CPA?

The responses to the question about site GH/ED/□□ being within the proposed Coastal Preservation Area (CPA) express strong opposition to the inclusion of this site for potential development. Respondents emphasise the importance of preserving the site's environmental and scenic value, as well as concerns about the site's impact on the sensitive ecosystems of the Exe Estuary. There are also widespread concerns about the already strained infrastructure and services in the Lypstone and Exmouth areas, which would be further stressed by additional development.

Key points raised, in order of frequency:

- Objections to Development within the CPA
 - Questioning the rationale for considering development in a protected coastal area
 - Calls to maintain the established CPA boundaries and restrictions
- Concerns about Environmental and Landscape Impacts
 - Preserving the natural habitats and ecosystems surrounding the Exe Estuary
 - Maintaining the scenic character and views of the coastal landscape
- Infrastructure and Service Capacity Issues
 - Existing roads, schools, healthcare facilities, and other services already at capacity
 - Doubts about the ability to support additional development
- Impacts on the Character and Identity of Lypstone
 - Concerns about the scale of development overwhelming the rural character of the village
 - Potential conflicts with the adopted Lypstone Neighbourhood Plan
- Flooding and Drainage Concerns
 - Increased risk of flooding and runoff into the Exe Estuary due to additional development
- Preference for Protecting Farmland and Open Spaces
 - Objections to the loss of valuable agricultural land and undeveloped areas
- Acknowledgment of the Site's Sustainable Location
 - Recognition of the site's accessibility and proximity to public transport options

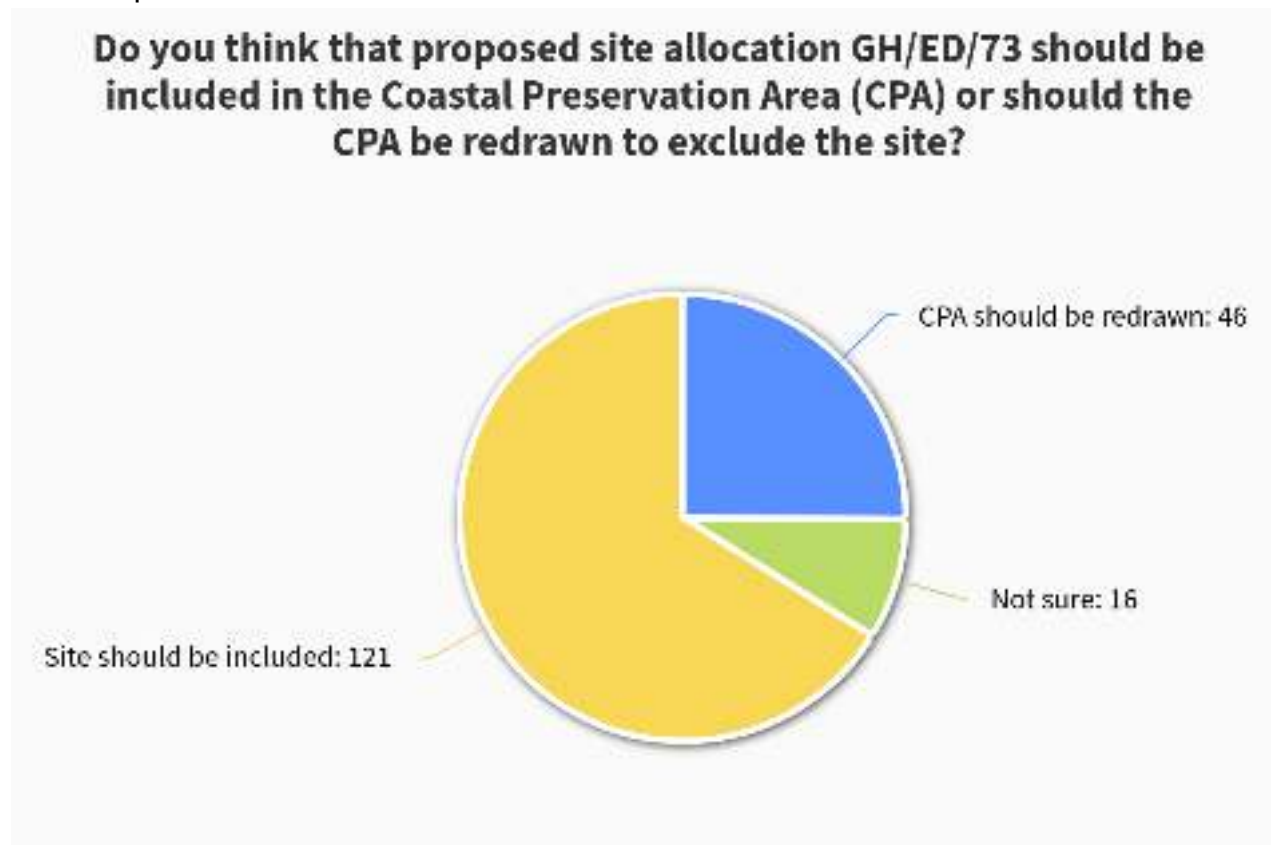
Statutory organisations summary

Historic England

Any decision to remove GH/ED/72 should be informed by decisions on these site allocations. We note that these are in proximity to numerous designated heritage assets and should therefore be considered as part of the HESA.

GH/ED/73

Total responses: 182



Do you have any comments on GH/ED/□□ being within the proposed CPA?

The responses to the question about site GH/ED/□□ being within the proposed Coastal Preservation Area (CPA) express similar concerns to those raised about GH/ED/□□. There is strong opposition to including this site for potential development, with respondents emphasising the importance of preserving the environmental and scenic value of the area, as well as doubts about the ability of the local infrastructure and services to accommodate additional housing.

Key points raised, in order of frequency:

- Objections to Development within the CPA
 - Questioning the rationale for considering development in a protected coastal area
 - Calls to maintain the established CPA boundaries and restrictions
- Concerns about Environmental and Landscape Impacts
 - Preserving the natural habitats and ecosystems surrounding the Exe Estuary
 - Maintaining the scenic character and views of the coastal landscape
- Infrastructure and Service Capacity Issues

- Existing roads, schools, healthcare facilities, and other services already at capacity
 - Doubts about the ability to support additional development
- Impacts on the Character and Identity of Lypstone
 - Concerns about the scale of development overwhelming the rural character of the village
 - Potential conflicts with the adopted Lypstone Neighbourhood Plan
- Flooding and Drainage Concerns
 - Increased risk of flooding and runoff into the Exe Estuary due to additional development
- Preference for Protecting Farmland and Open Spaces
 - Objections to the loss of valuable agricultural land and undeveloped areas
- Acknowledgment of the Site's Sustainable Location
 - Recognition of the site's accessibility and proximity to public transport options

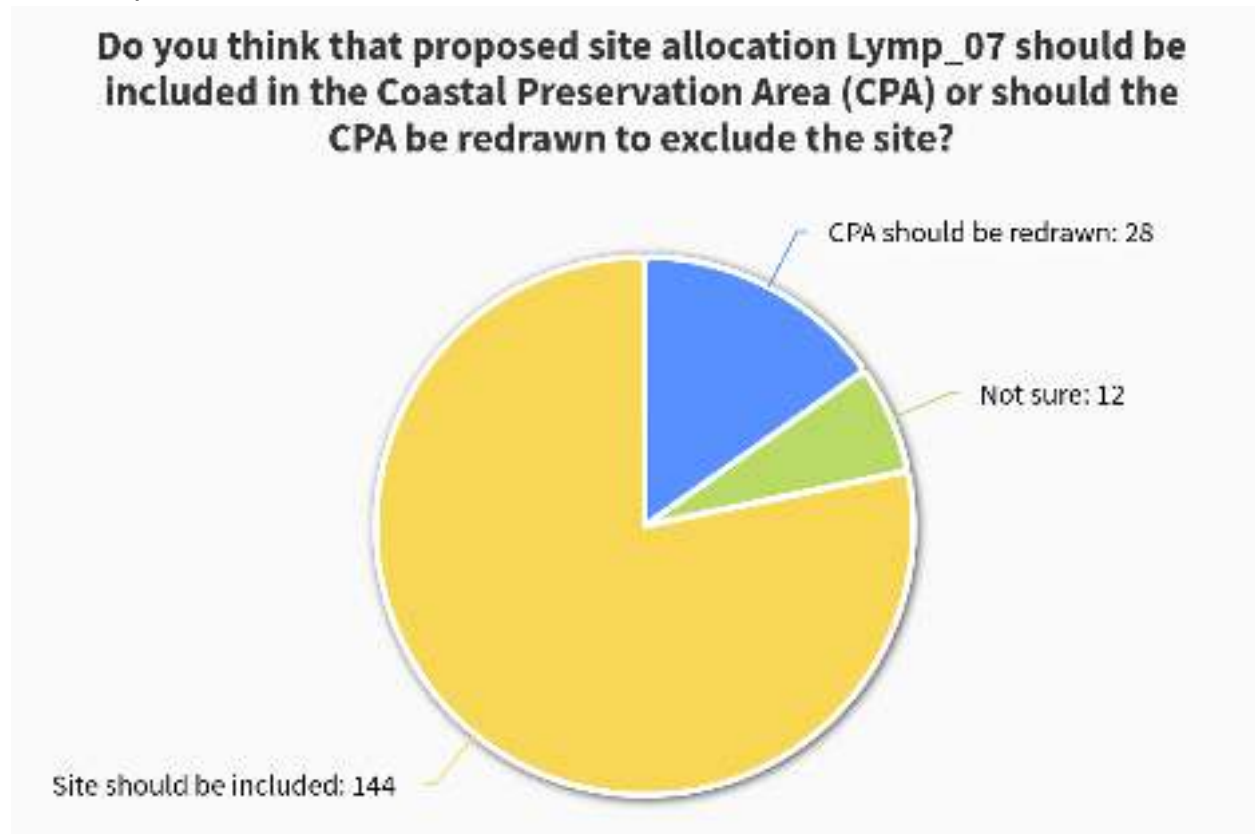
Statutory organisations summary

Historic England

Any decision to remove GH/ED/72 should be informed by decisions on these site allocations. We note that these are in proximity to numerous designated heritage assets and should therefore be considered as part of the HESA.

Lymp_07

Total responses: 184



Do you have any comments on Lymp_07 being within the proposed CPA?

The responses to the question about Lymp_07 being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development in this area. Respondents emphasise the importance of preserving the natural beauty, wildlife habitats, and the distinct identity of Lympstone as a village separate from Exmouth. Many raise concerns about the inability of the current infrastructure, particularly roads, to support additional development in this area. There is a strong sentiment that this site should be included in the CPA to prevent further encroachment on the green wedge between Exmouth and Lympstone.

Key points raised, in order of frequency:

- Preservation of green space and wildlife habitats
 - Maintain the distinct identity of Lympstone as a village separate from Exmouth
 - Protect the rural character and biodiversity of the area
- Infrastructure concerns
 - Inability of the road network, particularly the A109, to handle additional traffic
 - Overloading of existing public services and utilities
- Opposition to development in the CPA

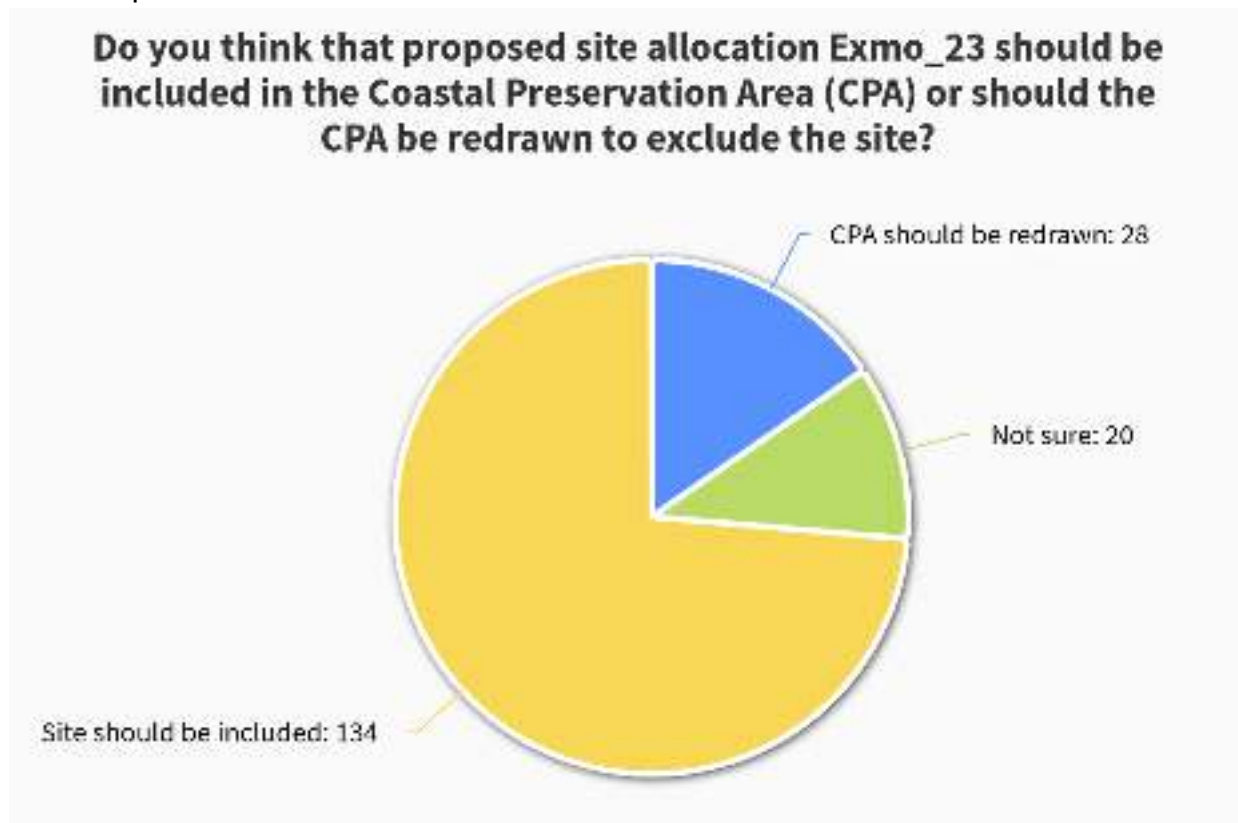
- Concerns about setting a precedent for development in protected areas
- Call for this site to be included in the CPA to prevent further encroachment
- Recreational and community value
 - Importance of preserving the green wedge and views for local residents and visitors
 - Impact on the East Devon Way walking route
- Previous planning decisions
 - Reminder that this site was previously rejected for development
 - Lack of changed circumstances to justify a different outcome
- Separation of Lympstone and Exmouth
 - Concern about the merging of the two settlements
 - Importance of maintaining a clear boundary between the town and village
- Support for development
 - Concern over low levels of growth proposed in Exmouth generally

Statutory organisations summary

None

Exmo_23

Total responses: 182



Do you have any comments on Exmo_□□ being within the proposed CPA?

The responses to the question about Exmo_□□ being within the proposed Coastal Preservation Area (CPA) predominantly reveal strong opposition to development in this area. Most respondents express concerns about environmental impact, coastal preservation, and traffic issues. There is a notable emphasis on the importance of maintaining the coastal character and addressing existing infrastructure problems before considering new developments.

Key points raised, in order of frequency:

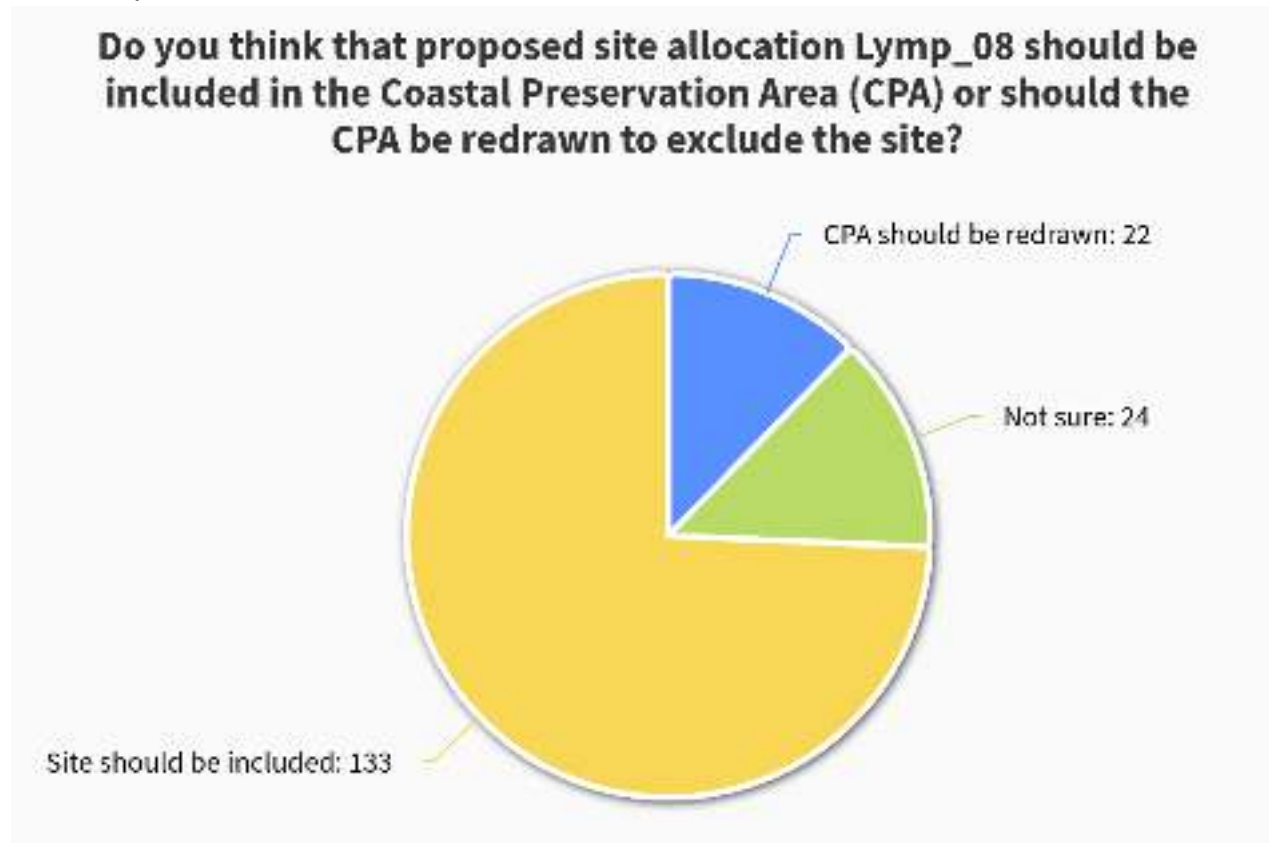
- Environmental and coastal protection
 - Concerns about damage to the environment, coastal zones, and wildlife
 - Visual impact on the estuary and coast
- Opposition to further development
 - Calls to stop building houses in the area
 - Concerns about traffic and infrastructure capacity
- Visibility and landscape impact
 - Site's visibility from the coast
 - Importance of maintaining separation between areas
- Affordable housing and local needs
 - Call for more council houses instead of unaffordable housing
- Confusion or lack of information
 - Some respondents expressed confusion about the question or lack of information
- Mixed views on development
 - One respondent viewed the site as sensible infill
 - Suggestion that including the site in the CPA would be more honest

Statutory organisations summary

None

Lymp_08

Total responses: 179



Do you have any comments on Lymp_08 being within the proposed CPA?

The responses to the question about Lymp_08 being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development on this site. Respondents emphasise the importance of preserving the natural landscape, views, and wildlife habitats in this area. Many are concerned about the inadequate infrastructure, particularly the narrow roads and lack of public transport, to support additional development. There is a strong sentiment that this site should be included within the CPA to prevent further encroachment on the green wedge between Exmouth and Lympstone.

Key points raised, in order of frequency:

- Preservation of green space and wildlife habitats
 - Maintain the distinct identity of Lympstone as a village separate from Exmouth
 - Protect the rural character and biodiversity of the area
- Infrastructure concerns
 - Inability of the narrow, rural roads to handle additional traffic
 - Lack of public transport options for this isolated site

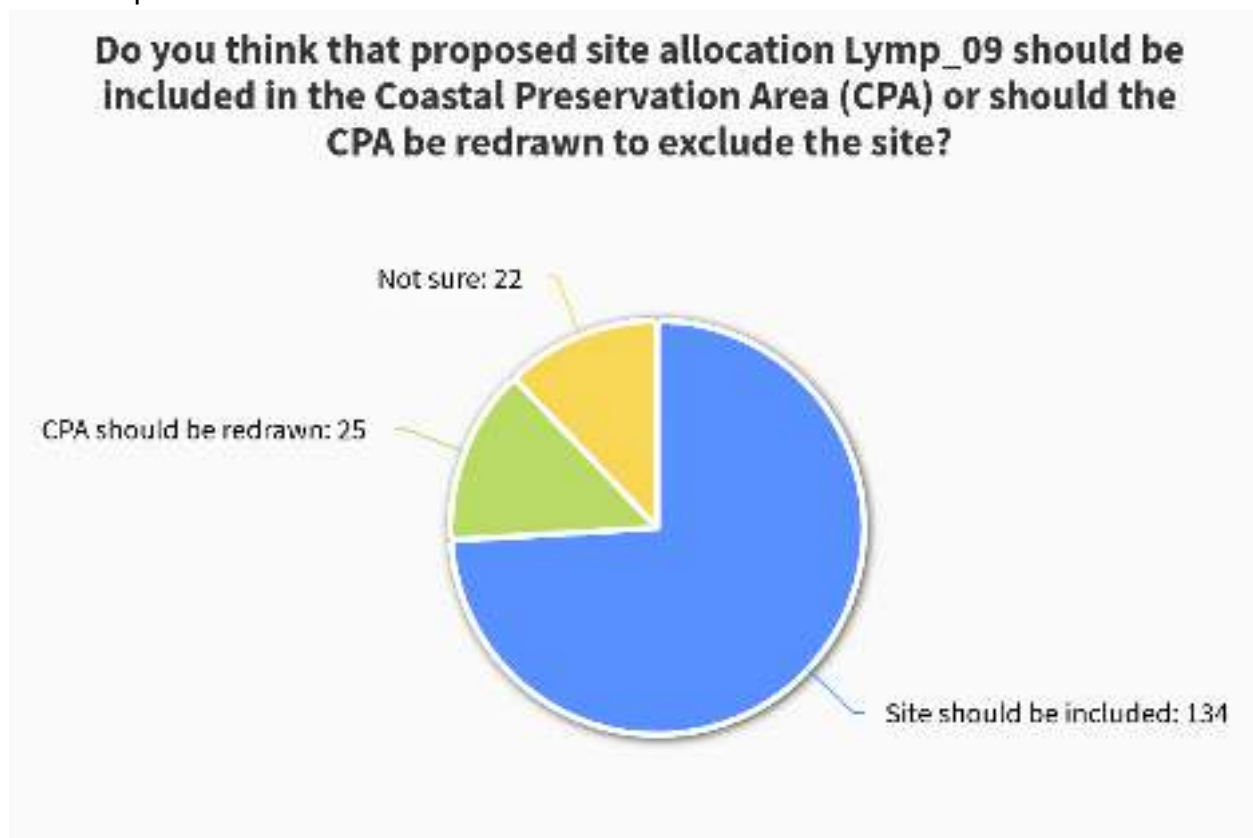
- ❑ Opposition to development in the CPA
 - Concerns about setting a precedent for development in protected areas
 - Call for this site to be included in the CPA to prevent further encroachment
- ❑ Flooding and drainage issues
 - Potential for increased runoff and flood risks
- ❑ Unsuitability of the site for development
 - Concerns about the site's isolation, narrow access roads, and proximity to listed properties
- ❑ Separation of Lympstone and Exmouth
 - Importance of maintaining a clear boundary between the town and village

Statutory organisations summary

None

Lymp_09

Total responses: 181



Do you have any comments on Lymp_□□ being within the proposed CPA?

The responses to the question about Lymp_□□ being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development on this site. Respondents emphasise the importance of preserving the open countryside, wildlife habitats, and the distinct separation between Lypstone and Exmouth. Many are concerned about the inadequate infrastructure, particularly the narrow roads and lack of public transport, to support additional development in this area. There is a strong sentiment that this site should be included within the CPA to prevent further encroachment on the green wedge and the sensitive Woodbury Common area.

Key points raised, in order of frequency:

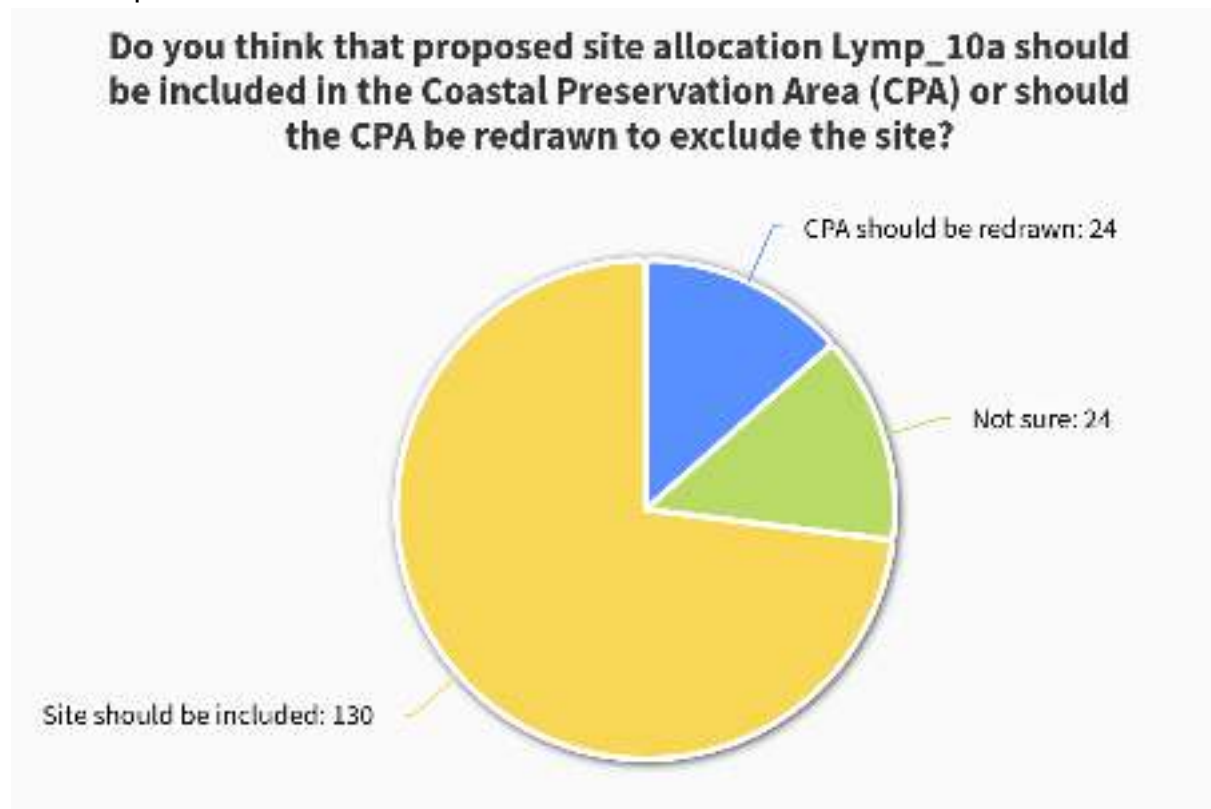
- Preservation of green space and wildlife habitats
 - Maintain the distinct identity of Lypstone as a village separate from Exmouth
 - Protect the rural character, biodiversity, and ecological sensitivity of the area near Woodbury Common
- Infrastructure concerns
 - Inability of the narrow, rural roads to handle additional traffic
 - Lack of public transport options for this isolated site
- Opposition to development in the CPA
 - Concerns about setting a precedent for development in protected areas
 - Call for this site to be included in the CPA to prevent further encroachment
- Flooding and drainage issues
 - Potential for increased runoff and flood risks due to the site's location
- Separation of Lypstone and Exmouth
 - Importance of maintaining a clear boundary between the town and village
- Unsuitability of the site for development
 - Concerns about the site's isolation, proximity to Woodbury Common, and lack of integration with existing homes
- Landscape and visual impacts
 - Detrimental impacts on views from the Exe Estuary

Statutory organisations summary

None

Lymp_10a

Total responses: 178



Do you have any comments on Lymp_10a being within the proposed CPA?

The responses to the question about Lymp_10a being within the proposed Coastal Preservation Area (CPA) overwhelmingly express opposition to any development on this site. Respondents emphasise the importance of preserving the open countryside, wildlife habitats, and the distinct separation between Lympstone and Exmouth, especially in relation to the ecologically sensitive Woodbury Common area. Many are concerned about the inadequate infrastructure, particularly the narrow roads and lack of public transport, to support additional development in this remote location. There is a strong sentiment that this site should be included within the CPA to prevent further encroachment on the green wedge and protected landscapes.

Key points raised, in order of frequency:

- Preservation of green space and wildlife habitats
 - Maintain the distinct identity of Lympstone as a village separate from Exmouth
 - Protect the rural character, biodiversity, and ecological sensitivity of the area near Woodbury Common
- Infrastructure concerns

- Inability of the narrow, rural roads to handle additional traffic
 - Lack of public transport options for this isolated site
- ☐ Opposition to development in the CPA
 - Concerns about setting a precedent for development in protected areas
 - Call for this site to be included in the CPA to prevent further encroachment
- ☐ Flooding and drainage issues
 - Potential for increased runoff and flood risks due to the site's location
- ☐ Separation of Lympstone and Exmouth
 - Importance of maintaining a clear boundary between the town and village
- ☐ Unsuitability of the site for development
 - Concerns about the site's isolation, proximity to Woodbury Common, and lack of integration with existing homes
- ☐ Landscape and visual impacts
 - Detrimental impacts on views from the Exe Estuary
- ☐ Proximity to Woodbury Common
 - Concerns about encroachment on this ecologically sensitive area

Statutory organisations summary

None

Other comments

Do you have any other comments on the proposed Coastal Preservation Area?

The responses to the question about the proposed Coastal Preservation Area (CPA) reveal a strong sentiment towards protecting and preserving coastal areas in East Devon. Many respondents express concerns about development within these areas, emphasising the importance of maintaining natural beauty, wildlife habitats, and recreational spaces. There are also significant worries about infrastructure capacity, particularly regarding roads, sewage systems, and local services. While some support the proposed CPA extensions, others feel the area is too large or may hinder necessary development. The comments reflect a tension between preservation and development needs, with many calling for a balanced approach that prioritises environmental protection.

Key points raised, in order of frequency:

- ☐ Environmental and landscape protection
 - Importance of preserving natural beauty, wildlife habitats, and biodiversity
 - Calls to protect green spaces and farmland
 - Concerns about irreversible damage to ecosystems
- ☐ Opposition to development in CPA/protected areas
 - Criticism of considering development in preserved areas
 - Concerns about setting precedents for future development
 - Calls to maintain existing CPA boundaries
- ☐ Infrastructure concerns

- Inadequate roads, schools, healthcare facilities, and sewage systems
- Inability of current infrastructure to support additional housing
- Specific concerns about sewage treatment and water management
- Recreational value and public access
 - Importance of maintaining areas for walking, cycling, and public enjoyment
 - Value of open spaces for community well-being and mental health
- Support for CPA expansion or maintenance
 - Calls to extend or maintain current CPA boundaries
 - Recognition of the CPA's importance for future generations
- Local character and tourism
 - Concerns about overdevelopment impacting local character
 - Importance of preserving natural areas for tourism
- Traffic and congestion issues
 - Worries about increased traffic on local roads
 - Existing congestion problems, particularly in Exmouth
- Affordable housing and development needs
 - Recognition of housing needs, particularly for local and young people
 - Calls for focus on brownfield sites or urban extensions instead of CPA areas
- Criticisms of CPA extent or implementation
 - Concerns that proposed CPA is too large or extends too far inland
 - Questions about the criteria used for CPA designation

Statutory organisations summary

Devon County Council

Highways state that some of these areas contain routes that could be proposed as walking and cycling routes as part of the Countywide LCWIP (Local Cycling and Walking Infrastructure Plan). It is assumed that the delivery of these routes would not be impacted by the areas being designated a Coastal Preservation Area.

Natural England

Agree that the proposed additional area to the east of the A376 does have views of the Exe estuary and shares a similar landscape quality as the area to the west of the A376 and therefore we welcome this expansion of the CPA.

Historic England

Area 4 – Budleigh Salterton to Exmouth: While we welcome the proposed addition of land adjacent to Exmo_17 into the Coastal Protection Area, insofar as this could help to protect the setting of the Grade II* listed Parish Church of St Margaret and St Andrew and its grounds, the proposed boundary does not appear logical or consistent when considered in relation to the

wider Coastal Preservation Area. We note that Exmo_17 is a second choice allocation and we suggest that a more logical and defensible boundary for the Coastal Protection Area should follow the line of the former Branch Railway / Budleigh cycle track. This would draw in the area with wooded field boundaries around Littleham Brook.

Area 5 – Exmouth to Ebford: Any decision to remove GH/ED/72 and GH/ED/73 should be informed by decisions on these site allocations. We note that these are in proximity to numerous designated heritage assets and should therefore be considered as part of the HESA.

12. Green Wedges

Green Wedge Policy

Do you think the wording of the Green Wedges policy is appropriate?

The responses to the question about the appropriateness of the Green Wedges policy wording show mixed opinions, with a slight majority expressing support for the policy as written. However, many respondents, even those who generally agree with the policy, suggest that the wording could be strengthened to provide more robust protection for Green Wedges. There are also concerns about potential loopholes in the current wording and calls for clearer, more definitive language prohibiting development in these areas.

Key points raised, in order of frequency:

- Support for the policy wording as is
 - Many find it clear and appropriate
 - Seen as important for maintaining settlement identity
- Calls for stronger, more definitive language
 - Suggestions to prohibit all development in Green Wedges
 - Concerns about potential loopholes in current wording
- Need for clearer definitions and less ambiguity
 - Some find the wording confusing or open to interpretation
 - Calls for more specific criteria for what constitutes a Green Wedge
- Requests to reinstate or add environmental protection aspects
 - Mentions of wildlife corridors, biodiversity, and ecological importance
 - Desire to include health and wellbeing benefits of green spaces
- Concerns about policy implementation and enforcement
 - Questions about how strictly the policy will be applied
 - Worries about potential overrides by developers or planners
- Suggestions for policy expansion
 - Proposals to include more areas as Green Wedges
 - Calls for broader protection of rural character
- Criticisms of the policy concept
 - Some view it as too restrictive for necessary development
 - Concerns about hindering economic growth
 - Criticism that policy is far more restrictive than previous policy
 - Criticism that the latest boundaries are not evidence-based following a reverting back to original boundaries
- Support for the principle, but doubts about effectiveness
 - Agreement with the intent, but skepticism about practical application
 - Worries about gradual erosion of Green Wedges over time
- Requests for simpler language
 - Some find the wording too complex or technical

- Calls for more accessible phrasing for non-experts
- Concerns about consistency with other planning policies
 - Questions about how Green Wedges relate to other designations
 - Calls for better integration with overall planning strategy

Statutory organisations summary

Natural England

Highlights the Green Wedge policy's potential for Local Nature Recovery Network (LNRN) and Biodiversity Net Gain (BNG) initiatives.

Councils should consider using green wedge areas for 'offsite' BNG sites.

30-year biodiversity gain programs align with long-term green wedge policy goals.

Strong correlation between green wedge designations and Draft LNRN, especially around Exmouth to Exeter and Seaton.

Recommendation to strengthen green wedge policy by referencing LNRN Strategy aims.

Local Planning Authority (LPA) advised to discuss LNRN mapping progress with Devon County Council to avoid conflicts.

Ensure potential site allocations in green wedge areas don't conflict with emerging LNRN.

Historic England

Generally welcome the Green Wedges, many of which also play a role in protecting designated or non-designated heritage assets and their settings.

Sites in Green Wedges

Do you think that sites proposed for new housing or employment development should be included in the Green Wedges (would the development be appropriate inside a Green Wedge?) or should the Green Wedges be redrawn to exclude them?

The responses to this question overwhelmingly oppose including new housing or employment development within Green Wedges. Most respondents view Green Wedges as important areas that should be protected from development to maintain separation between settlements, preserve local character, and protect the environment. There is strong sentiment against redrawing Green Wedge boundaries to accommodate development, as many feel this would undermine the purpose and integrity of Green Wedges. A small minority support some limited development within Green Wedges or redrawing boundaries in certain circumstances.

Key points raised, in order of frequency:

- Opposition to any development in Green Wedges

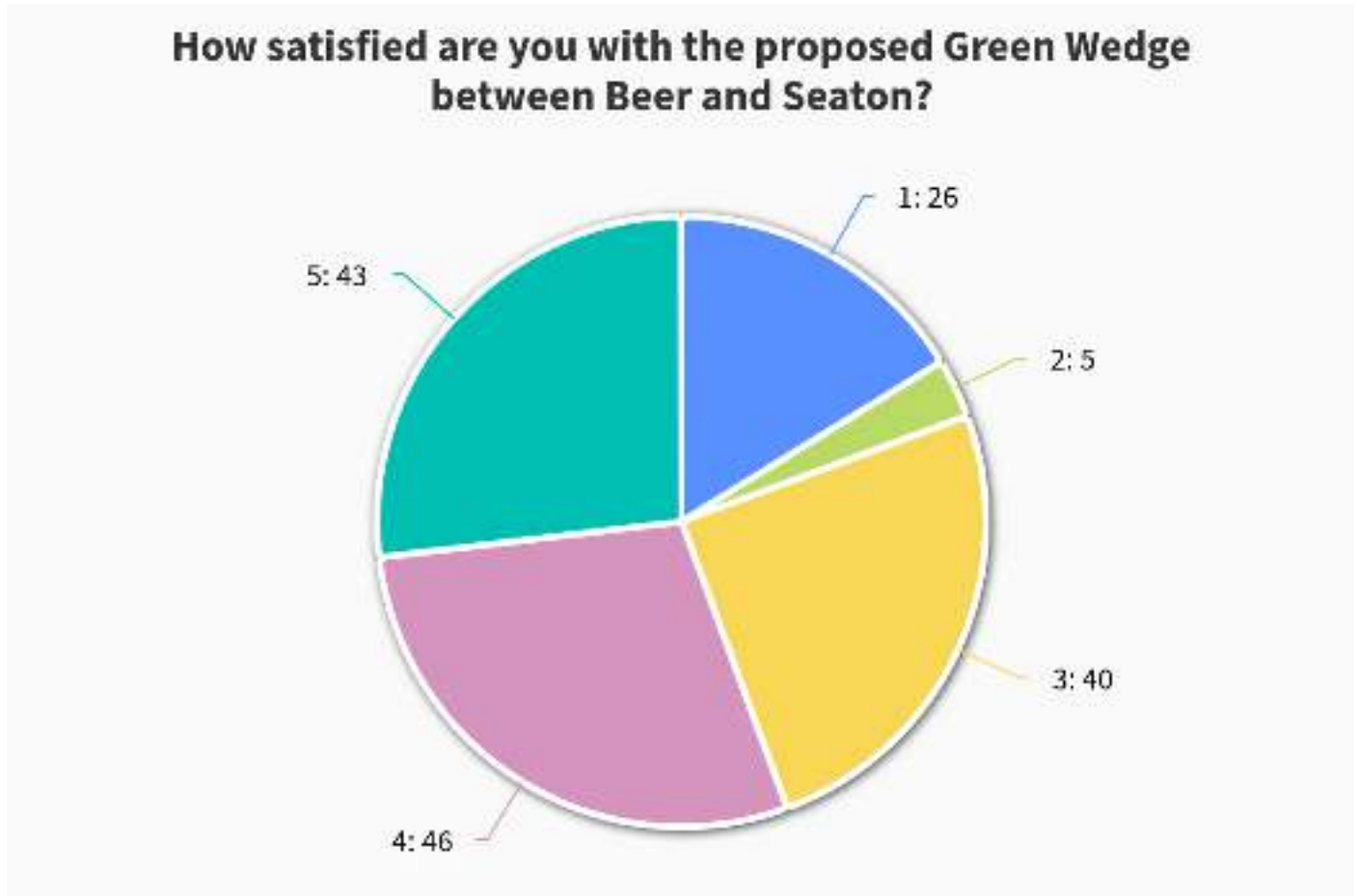
- Green Wedges should be protected from all development
- Development would undermine the purpose of Green Wedges
- Opposition to redrawing Green Wedge boundaries
 - Redrawing boundaries would set a precedent for future erosion
 - Changing boundaries undermines the integrity of Green Wedges
- Environmental and landscape protection
 - Preserving wildlife habitats and biodiversity
 - Maintaining green spaces for wellbeing and climate reasons
- Preserving settlement identity and character
 - Preventing coalescence of settlements
 - Maintaining distinct local identities
- Support for excluding development from Green Wedges
 - Green Wedges should be redrawn to exclude proposed development sites
 - Confusing and nonsensical if sites are included
- Infrastructure and service concerns
 - Inadequate roads, schools, healthcare facilities
 - Concerns about increased traffic and congestion
- Limited support for some development in Green Wedges
 - Some respondents open to limited or carefully managed development
- Calls for expanding or strengthening Green Wedges
 - Suggestions to extend existing Green Wedges
 - Calls for stronger protections for Green Wedges
- Concerns about housing needs and affordability
 - Recognition of housing needs, but not at expense of Green Wedges
 - Suggestions to focus on brownfield sites or existing urban areas
- Confusion or disagreement with the question
 - Some respondents found the question unclear or disagreed with its premise

Statutory organisations summary

None

Beer and Seaton

Total responses: 160



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge between Beer and Seaton show a mix of opinions, with a majority expressing support for maintaining or expanding the Green Wedge. Many respondents emphasise the importance of preserving the distinct identities of Beer and Seaton, protecting the environment, and preventing urban sprawl. Some residents express concerns about potential development in the area, while others feel the proposed Green Wedge is adequate. A notable number of respondents indicate they are not familiar enough with the area to comment. There are also suggestions for specific extensions or inclusions to the Green Wedge.

Key points raised, in order of frequency:

- Support for maintaining or expanding the Green Wedge
 - Importance of preventing urban sprawl
 - Desire to protect countryside and green spaces
- Lack of familiarity with the area
 - Some respondents felt unable to comment due to unfamiliarity
- Specific suggestions for extension or inclusion
 - Inclusion of specific fields, woodlands, or archaeological sites
- Satisfaction with the proposed Green Wedge
 - Agreement that it creates an appropriate corridor between settlements
- Concerns about development and environmental protection
 - Worries about impact on local services and infrastructure
 - Emphasis on protecting areas of beauty and environmental significance
- Criticism of the Green Wedge concept or implementation
 - Questioning the definition of Green Wedges
 - Concerns about the effectiveness of the policy
- Calls for stronger protection or expansion
 - Suggestions to prohibit all development in Green Wedges
 - Desire for inclusion of more areas in the Green Wedge
- Comments on maintaining distinct community identities
 - Importance of separating Beer and Seaton to preserve their individual characters
- Requests for clarification or additional information
 - Some respondents found the question unclear or needed more details

Statutory organisations summary

Devon County Council

Historic Environment state that the Beer & Seaton Green Wedge should also include the field included in the residential allocations as Seaton_13a (Axe View Road). This is an area of high archaeological sensitivity, forming part of the setting of the Scheduled Roman site at Honeyditches, and should not be allocated for development.

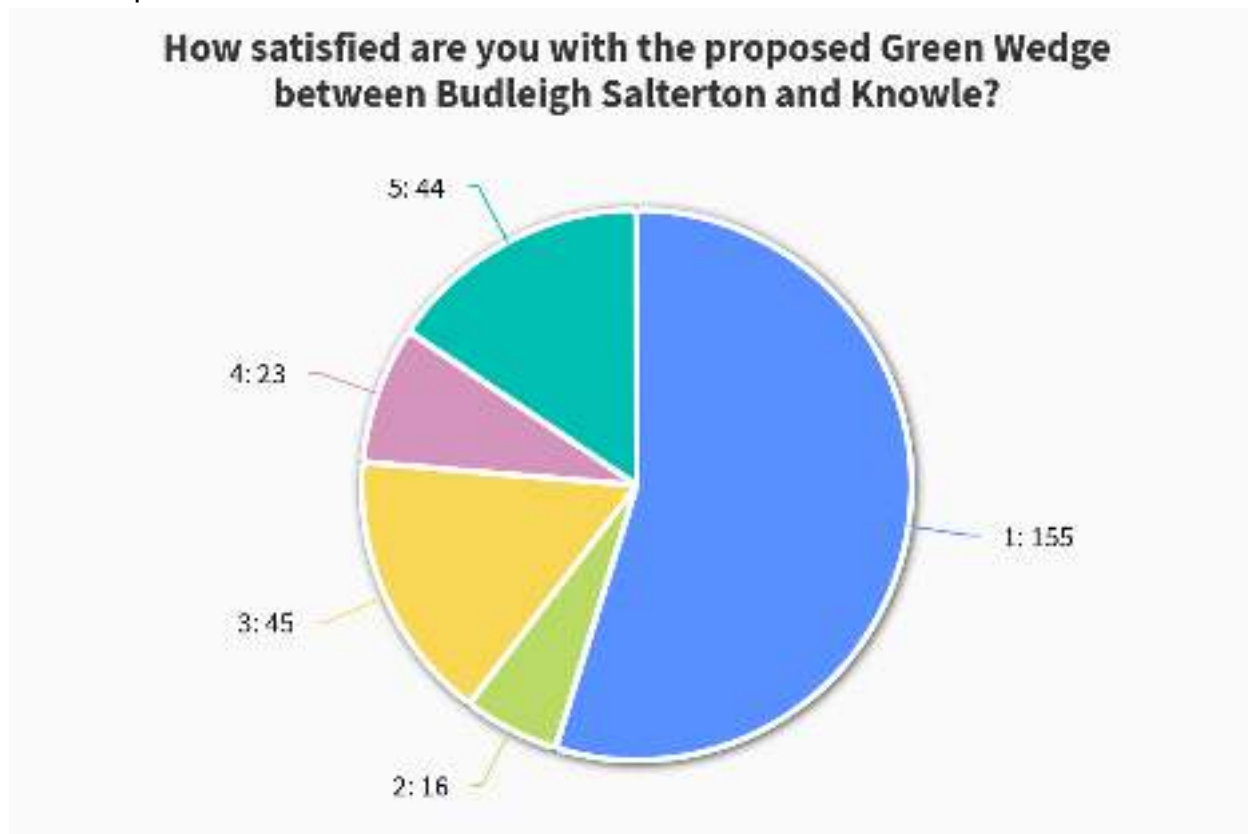
Minerals note that the Beer & Seaton Green Wedge is within a Mineral Safeguarding Area, where nearby mineral resources are protected from sterilisation or constraint. Mineral workings are considered greenfield once restored which appears compatible with the policy wording proposed.

Historic England

Welcome green wedge and note that it contains the Scheduled Monument at Seaton (Roman and earlier settlement at Honeyditches) along with adjacent land that is being considered for allocation (Seat 13a). To protect the Scheduled Monument and its remaining rural setting it would be preferable that this land is retained within the Green Wedge and not released for future development.

Budleigh Salterton and Knowle

Total responses: 327



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The majority of respondents expressed strong opposition to any development within the Green Wedge between Budleigh Salterton and Knowle. Many were confused by the wording of the question, interpreting it as a proposal to reduce the Green Wedge area for development (referred to as Budl_□□). Residents emphasised the importance of maintaining the Green Wedge for its environmental, social, and aesthetic value.

Most frequently raised points (From most frequent to least frequent):

- Opposition to development:
 - Strong objection to any building or development within the Green Wedge
 - Concerns that allowing development would set a precedent for future erosion of the Green Wedge
- Infrastructure issues:
 - Existing sewage system is inadequate and already struggling

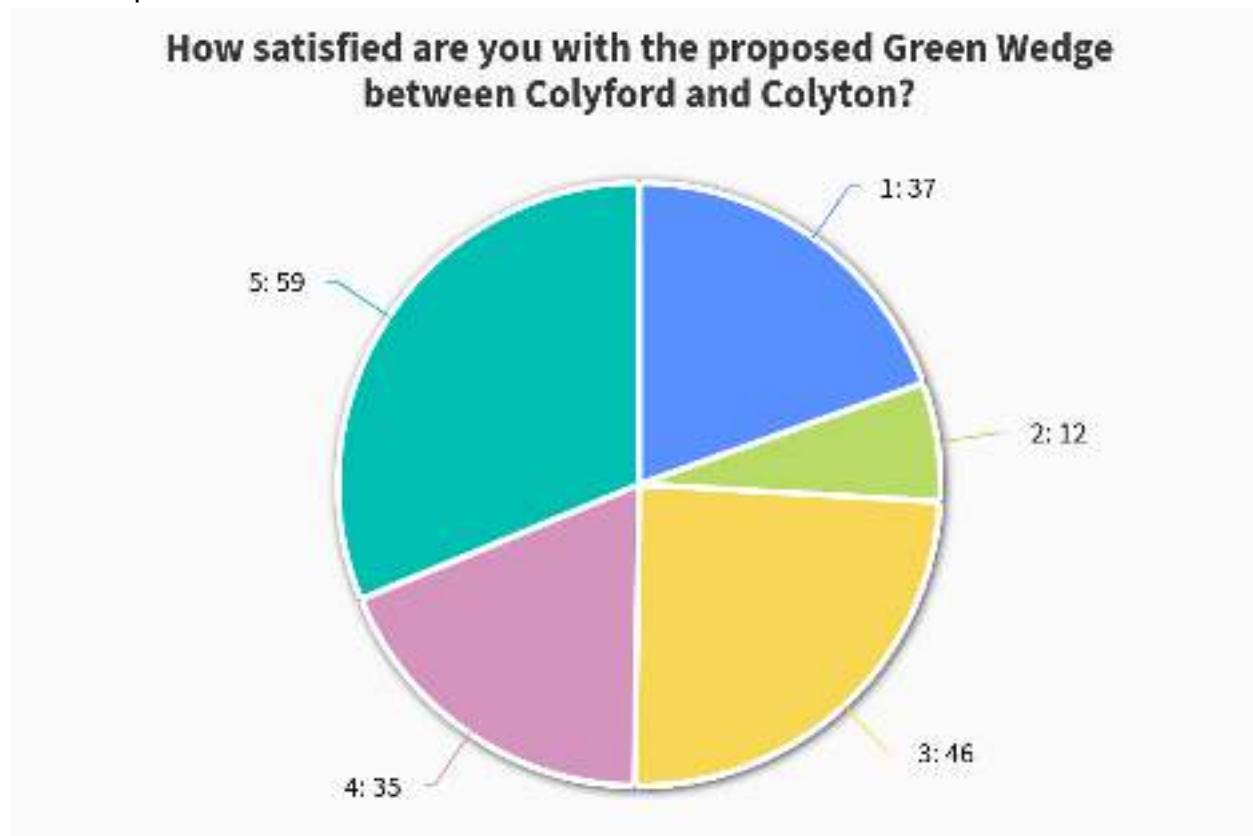
- Local medical facilities (GP, dentists) are at capacity
- Schools are oversubscribed and cannot accommodate more students
- ☐ Environmental concerns:
 - The area is important for wildlife and biodiversity
 - Loss of Grade II agricultural land
 - Concerns about increased flooding risk
- ☐ Preservation of community identity:
 - The Green Wedge maintains separation between Budleigh Salterton and Knowle
 - Development would lead to coalescence of the two distinct communities
- ☐ Traffic and road safety:
 - Surrounding roads (especially Bedlands Lane, Dark Lane, Knowle Road) are narrow and unsuitable for increased traffic
 - Concerns about road safety, particularly for pedestrians and cyclists
- ☐ Landscape and character:
 - The Green Wedge is part of an Area of Outstanding Natural Beauty (AONB)
 - Development would negatively impact the rural character and views
- ☐ Policy and planning concerns:
 - Objections to changing the definition or boundaries of the Green Wedge
 - Calls for stronger protection of Green Wedges in local planning policy
- ☐ Consultation process:
 - Some respondents found the consultation question confusing or misleading
 - Concerns about how well the consultation was advertised, particularly to older residents
- ☐ Alternative suggestions:
 - Proposals to use the land for other purposes (e.g., new school, convalescent home)
 - Suggestions to focus development on brownfield sites or other areas
- ☐☐ Support for development:
 - A small minority expressed support for housing development to meet local needs

Statutory organisations summary

None

Colyford and Colyton

Total responses: 189



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge between Colyford and Colyton reveal a mix of opinions, with a majority supporting the current extent or calling for its expansion. Many respondents emphasise the importance of maintaining separation between the two communities and preserving the rural character of the area. There are concerns about potential development, particularly regarding skyline visibility and infrastructure capacity. Some respondents suggest specific extensions to the Green Wedge, while a few express confusion about the question or lack familiarity with the area.

Key points raised, in order of frequency:

- Support for maintaining or expanding the Green Wedge

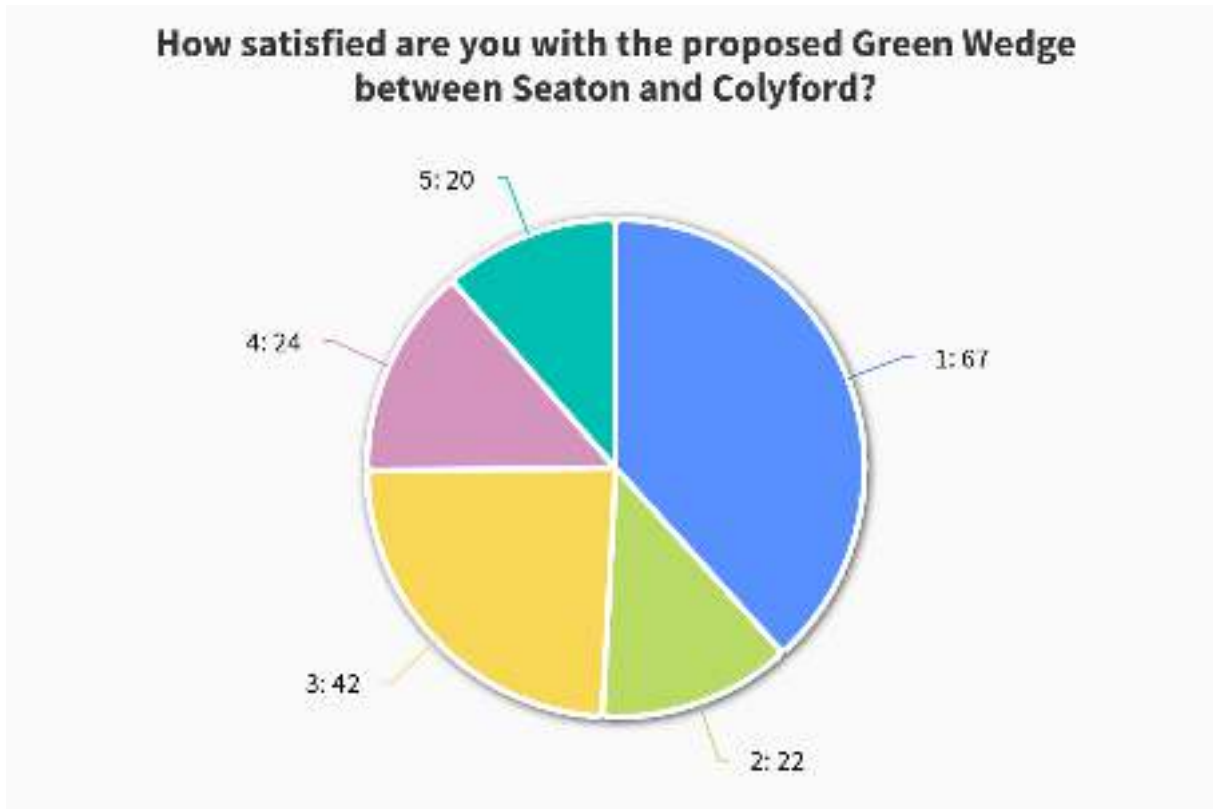
- Calls to extend the Green Wedge, particularly to the west and north
 - Emphasis on preserving the separation between Colyton and Colyford
- Environmental and landscape protection
 - Preservation of rural character and natural beauty
 - Protection of wildlife corridors and biodiversity
- Opposition to development in the Green Wedge
 - Concerns about urban sprawl and loss of green space
 - Resistance to any future development in the area
- Infrastructure and service capacity concerns
 - Issues with road capacity, drainage, and sewage systems
 - Worries about pressure on local services
- Alignment with local plans and policies
 - References to the Colyton and Colyford Neighbourhood Plan
 - Mentions of the 100-foot contour development limit
- Lack of familiarity or difficulty commenting
 - Some respondents felt unable to comment due to lack of local knowledge
- Concerns about skyline development
 - Worries about visual impact of development on higher ground
- Flood plain considerations
 - Importance of preserving flood plains and managing water
- Suggestions for specific boundary adjustments
 - Proposals to include or exclude particular areas from the Green Wedge
- Criticism of the Green Wedge concept
 - Questions about the purpose and effectiveness of Green Wedges

Statutory organisations summary

None

Seaton and Colyford

Total responses: 175



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge between Seaton and Colyford reveal strong opposition to any development within the Green Wedge area. Many respondents emphasise the importance of maintaining separation between the two settlements, preserving wildlife habitats, and protecting the area's natural beauty. There are significant concerns about potential flooding, increased traffic, and the impact on local infrastructure if development occurs. A large number of comments specifically oppose development on sites Seat_□□ and Seat_□□, viewing these as threats to the integrity of the Green Wedge. Some respondents call for expanding the Green Wedge, while others express confusion about the question or the concept of Green Wedges.

Key points raised, in order of frequency:

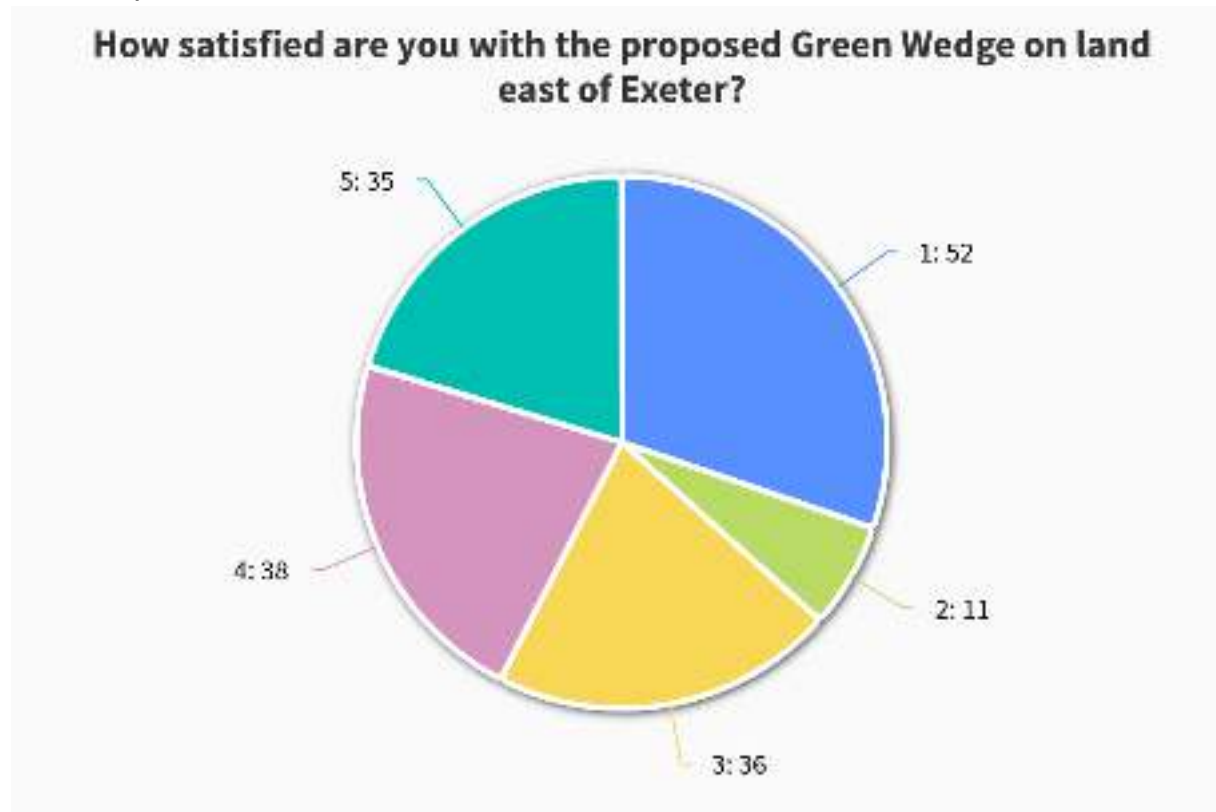
- Opposition to development within the Green Wedge
 - Strong resistance to any building on Green Wedge land
 - Concerns about setting precedents for future development
- Environmental and wildlife protection
 - Importance of preserving habitats, especially for bats and birds
 - Proximity to Seaton Wetlands and its ecological significance
- Maintaining separation between Seaton and Colyford
 - Desire to prevent settlement coalescence
 - Preserving distinct community identities
- Specific opposition to Seat_ and Seat_ developments
 - Viewed as particularly threatening to the Green Wedge's integrity
 - Concerns about proximity to existing settlements and natural areas
- Flooding and infrastructure concerns
 - Worries about increased flood risk from development
 - Strain on local services, roads, and sewage systems
- Calls for expanding the Green Wedge
 - Suggestions to include more areas in the protected zone
 - Desire for stronger environmental protections
- Landscape and visual impact concerns
 - Importance of preserving views and rural character
 - Concerns about skyline development
- Criticism of the consultation process or question
 - Confusion about the meaning of the question
 - Scepticism about the effectiveness of Green Wedges
- Support for some development or balanced approach
 - Limited backing for housing if it meets local needs
 - Suggestions for specific areas that could be developed
- Lack of familiarity or difficulty commenting
 - Some respondents felt unable to comment due to lack of local knowledge

Statutory organisations summary

None

Land East of Exeter

Total responses: 172



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge on land east of Exeter reveal mixed opinions, with a majority expressing support for maintaining or expanding the Green Wedge. Many respondents emphasise the importance of preserving the separation between Exeter and surrounding villages, protecting agricultural land, and maintaining the area's distinct character. There are significant concerns about potential flooding, increased traffic, and the impact on local infrastructure if development occurs. Some respondents question the effectiveness of the Green Wedge policy or find the concept unclear. A minority view supports some development in the area, citing housing needs near Exeter.

Key points raised, in order of frequency:

- Support for maintaining or expanding the Green Wedge

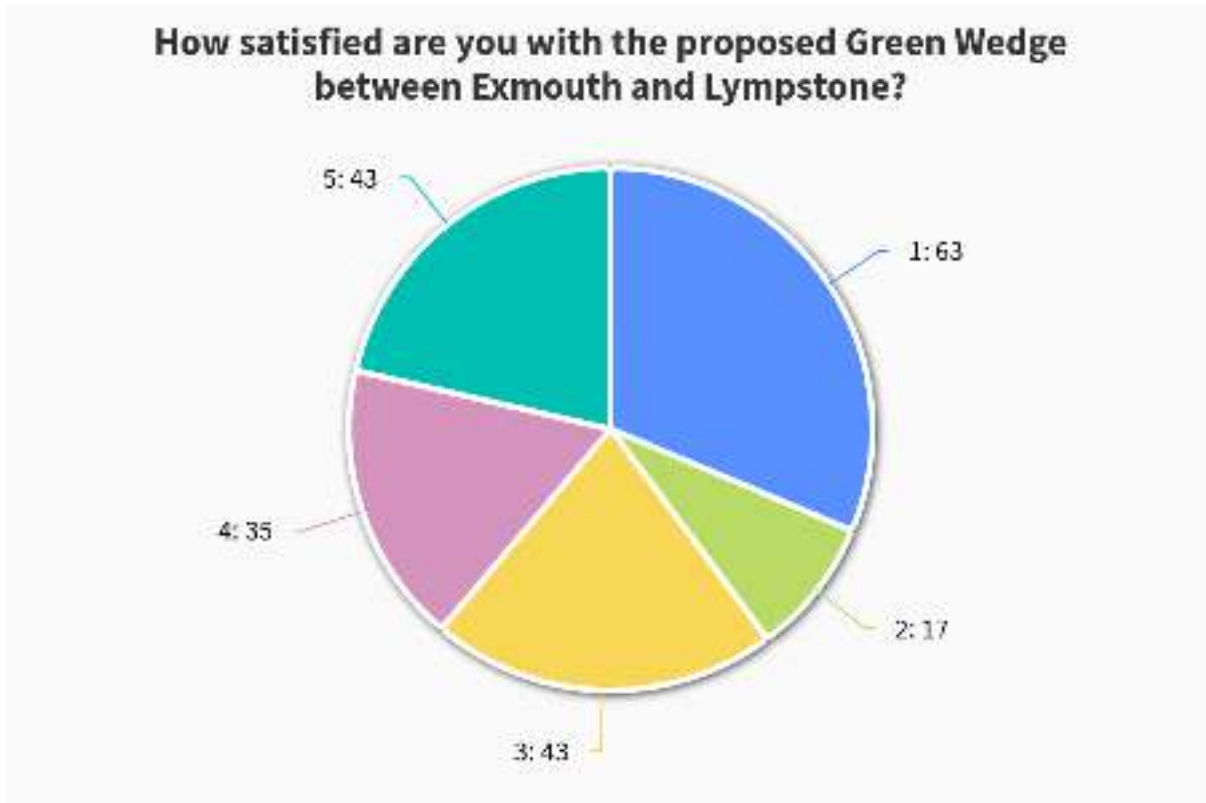
- Calls to extend the Green Wedge further east or make it larger
 - Emphasis on preserving separation between Exeter and East Devon villages
- ☐ Concerns about flooding and development on flood plains
 - Recognition that much of the area is prone to flooding
 - Worries about increased flood risk from development
- ☐ Traffic and infrastructure concerns
 - Existing congestion issues around Exeter
 - Worries about road capacity and increased traffic from new developments
- ☐ Criticism of development proposals within or near the Green Wedge
 - Opposition to specific development sites (e.g., Sowt_☐☐)
 - Concerns about erosion of the Green Wedge's purpose
- ☐ Protection of local character and identity
 - Desire to maintain distinct identities of villages and towns
 - Concerns about Topsham being subsumed into Exeter
- ☐ Environmental and wildlife protection
 - Importance of preserving habitats and wildlife corridors
 - Mention of the Clyst Valley Regional Park
- ☐ Confusion about the question or Green Wedge concept
 - Lack of clarity about the purpose and implementation of Green Wedges
 - Difficulty understanding the map or proposal
- ☐ Support for some development in the area
 - Recognition of housing needs near Exeter
 - Suggestions for specific areas that could be developed
- ☐ Agricultural land preservation
 - Importance of protecting farmland, including land associated with Darts Farm
- ☐☐ Criticism of the Green Wedge policy
 - Arguments that the policy is too restrictive or unnecessary
 - Concerns about stifling economic growth

Statutory organisations summary

None

Exmouth and Lympstone

Total responses: 201



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge between Exmouth and Lympstone overwhelmingly express strong support for maintaining and even expanding the current Green Wedge. Many respondents emphasise the importance of preserving the separation between Lympstone and Exmouth, protecting the village character of Lympstone, and maintaining environmental and recreational benefits. There is significant opposition to any development within the Green Wedge, particularly regarding the proposed sites Lymp_□□ and Lymp_□□. Concerns about infrastructure capacity, loss of agricultural land, and the impact on wildlife are also frequently mentioned.

Key points raised, in order of frequency:

- Strong support for maintaining or expanding the Green Wedge

- Prevent coalescence between Lympstone and Exmouth
 - Preserve Lympstone's village character and identity
- Opposition to development within the Green Wedge
 - Particularly strong opposition to Lymp_□□ and Lymp_□□
 - Concerns about setting precedents for future development
- Environmental and landscape protection
 - Preservation of wildlife habitats and biodiversity
 - Importance of maintaining the area's natural beauty
- Infrastructure concerns
 - Inadequate roads, schools, healthcare facilities, and sewage systems
 - Inability of current infrastructure to support additional housing
- Recreational value and public access
 - Importance of green spaces for community well-being and mental health
- Traffic and congestion issues
 - Worries about increased traffic on local roads
 - Existing congestion problems
- Suggestions for alternative development approaches
 - Proposals for focusing development in urban areas or creating new towns
- Confusion about the proposal or question
 - Some respondents found the question unclear or lacked information
- Support for limited development in specific areas
 - Some acceptance of small-scale development in certain locations

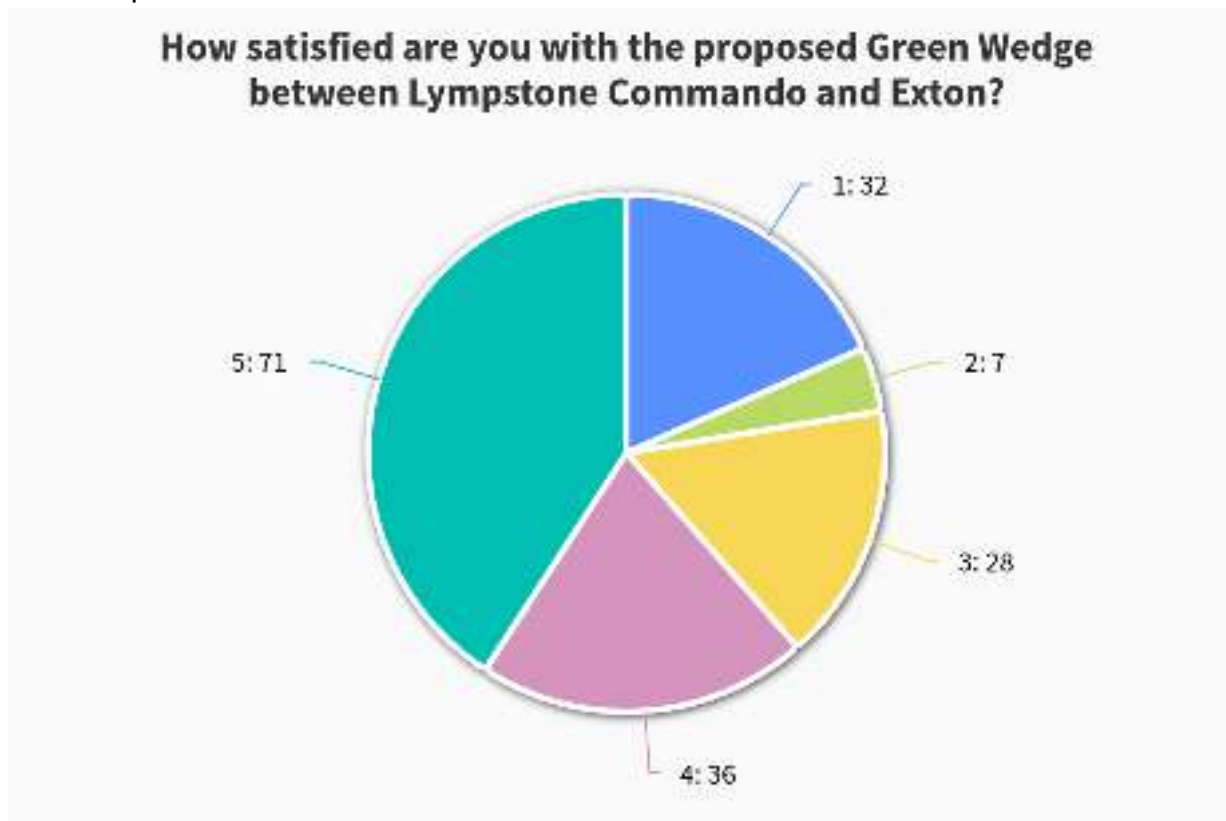
Statutory organisations summary

Historic England

Particularly welcome the inclusion of A La Ronde Registered Historic Park and Gardens in this Green Wedge.

Lympstone Commando and Exton

Total responses: 174



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge between Lympstone Commando and Exton generally express support for maintaining or expanding the Green Wedge. Many respondents emphasise the importance of preserving the separation between communities, protecting rural character, and maintaining environmental benefits. There is significant opposition to development within the Green Wedge. Some respondents express concerns about infrastructure capacity and the potential impact on local services. A few responses indicate confusion about the proposal or suggest that development might be acceptable in certain areas.

Key points raised, in order of frequency:

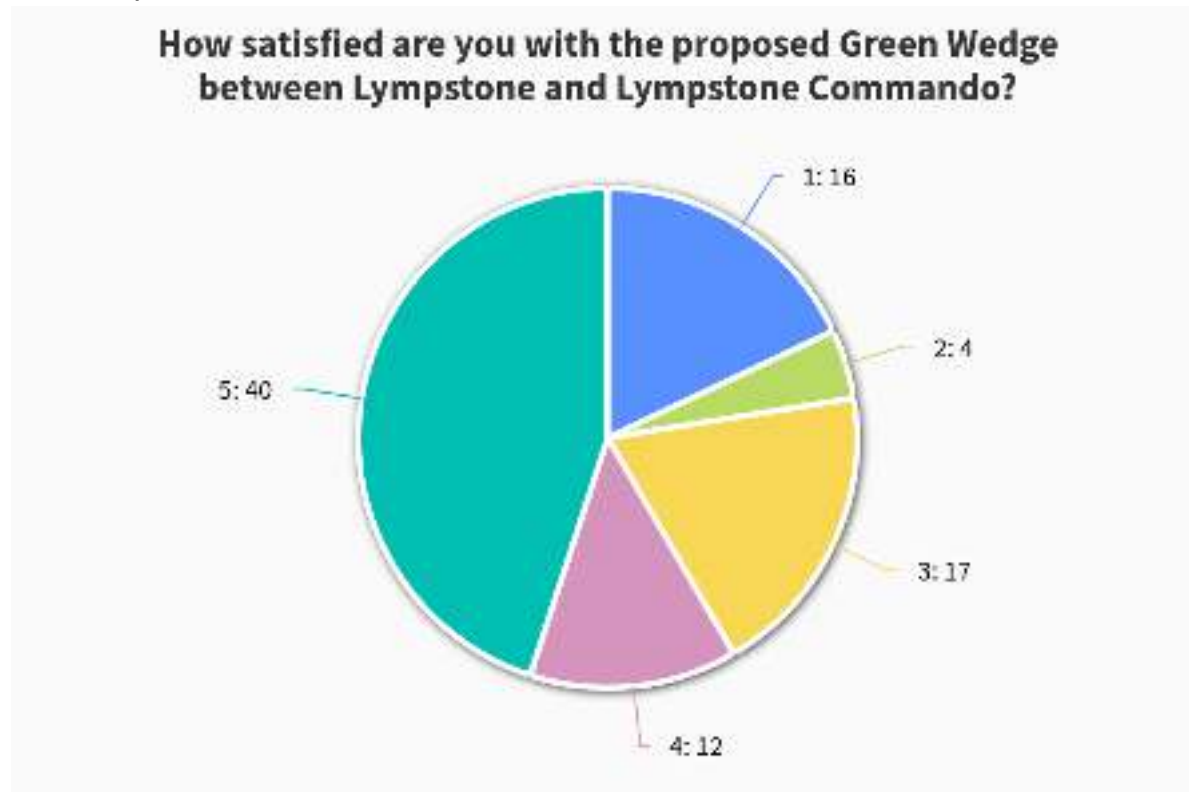
- Support for maintaining or expanding the Green Wedge
 - Prevent coalescence between communities
 - Preserve rural character and identity of villages
- Opposition to development within the Green Wedge
 - Concerns about loss of green space and agricultural land
 - Desire to maintain clear boundaries between communities
- Infrastructure and local services concerns
 - Inadequate roads, schools, healthcare facilities
 - Inability of current infrastructure to support additional housing
- Environmental protection and flood management
 - Preservation of wildlife habitats
 - Concerns about increased flooding risk
- Criticism of the consultation process or question
 - Confusion about the proposal
 - Perception of unclear or misleading language in the consultation
- Support for limited development in specific areas
 - Some acceptance of development within or near the Green Wedge
- Concerns about community identity and governance
 - Desire to maintain distinct identities for Lympstone, Exton, and Lympstone Commando
 - Concerns about administrative boundaries and decision-making
- Traffic and congestion issues
 - Worries about increased traffic on local roads
- Opposition to the concept of Green Wedges
 - Argument that development needs should override green space preservation

Statutory organisations summary

None

Lympstone and Lympstone Commando

Total responses: 89



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge between Lympstone and Lympstone Commando generally express strong support for maintaining or expanding the Green Wedge. Many respondents emphasise the importance of preserving the separation between communities, protecting rural character, and maintaining environmental benefits. There is significant opposition to development within the Green Wedge. Concerns about infrastructure capacity, flooding, and the impact on local services are frequently mentioned. Some respondents suggest expanding the Green Wedge to include additional areas, particularly Gulliford Farm.

Key points raised, in order of frequency:

- Support for maintaining or expanding the Green Wedge
 - Prevent coalescence between communities

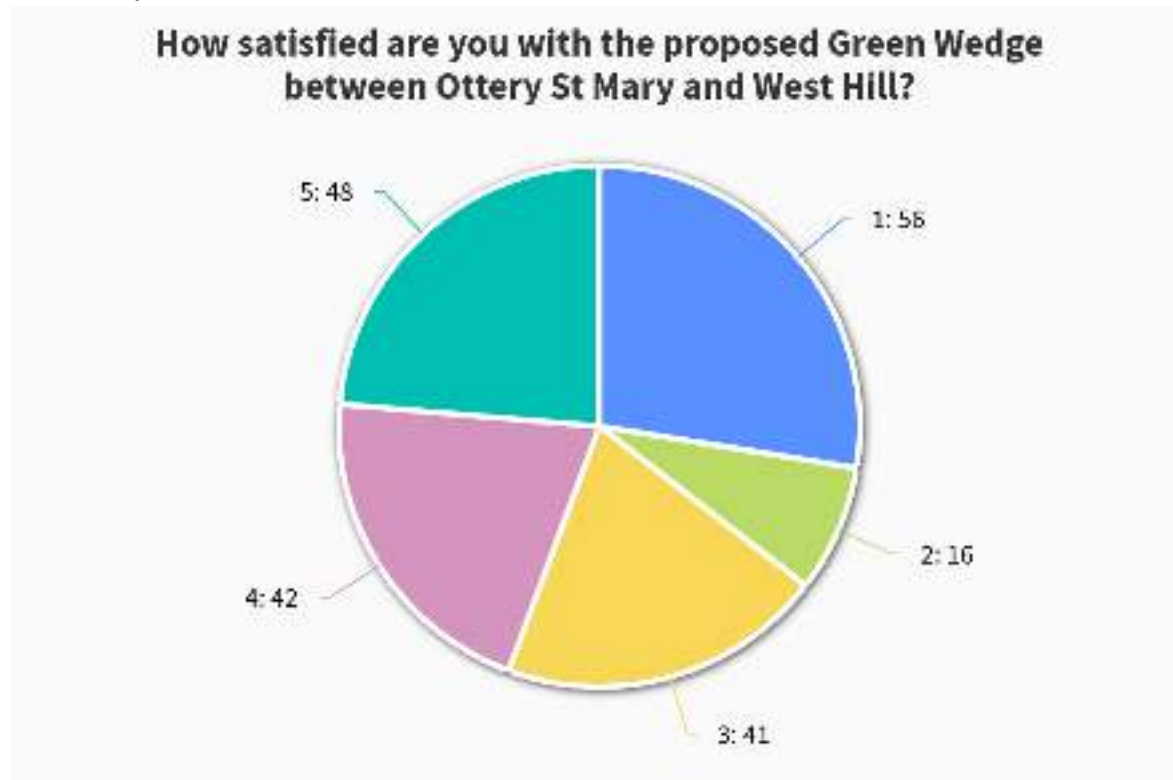
- Preserve rural character and identity of villages
 - Suggestions to include Gulliford Farm and other specific areas
- Opposition to development within the Green Wedge
 - Concerns about loss of green space and agricultural land
 - Desire to maintain clear boundaries between communities
- Infrastructure and local services concerns
 - Inadequate roads, schools, healthcare facilities
 - Inability of current infrastructure to support additional housing
- Environmental protection and flood management
 - Preservation of wildlife habitats and biodiversity
 - Concerns about increased flooding risk
- Criticism of the consultation process or question
 - Confusion about the proposal
 - Perception of unclear or misleading language in the consultation
- Concerns about community identity and governance
 - Desire to maintain distinct identities for Lympstone and Lympstone Commando
 - Worries about Lympstone being subsumed into larger urban areas
- Traffic and congestion issues
 - Worries about increased traffic on local roads, particularly the A□□□

Statutory organisations summary

None

Ottery St Mary and West Hill

Total responses: 203



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge between Ottery St Mary and West Hill show a strong sentiment in favour of maintaining and potentially expanding the green wedge. Respondents emphasise the importance of preserving the distinct identities of the two settlements, as well as protecting the natural environment, wildlife habitats, and recreational value of the area. Many express concerns about the current infrastructure's inability to support further development, citing issues with roads, schools, healthcare facilities, and other services. There is a clear desire to prevent the merging of Ottery St Mary and West Hill, and to respect the existing designations of the area as an Area of Outstanding Natural Beauty (AONB).

Key points raised, in order of frequency:

- Maintaining distinct identities of Ottery St Mary and West Hill
 - Importance of preserving the separation between the two settlements

- Preventing the merging of the two communities
- Environmental and landscape protection
 - Preservation of wildlife habitats and biodiversity
 - Importance of maintaining the area's natural beauty and rural character
- Infrastructure concerns
 - Inadequate roads, schools, healthcare facilities, and other services
 - Inability of current infrastructure to support additional development
- Recreational value and public access
 - Importance of the area for walking, leisure, and community well-being
- Opposition to development in the green wedge
 - Criticism of any proposed development within the green wedge
 - Concern about setting a precedent for future encroachment
- Flooding and drainage concerns
 - Site being on a flood plain
 - Potential impact on water management
- Support for the green wedge
 - Calls for the green wedge to be maintained or expanded
- Specific concerns about the Otry_□□b site
 - Disagreement about the inclusion or exclusion of this site within the green wedge

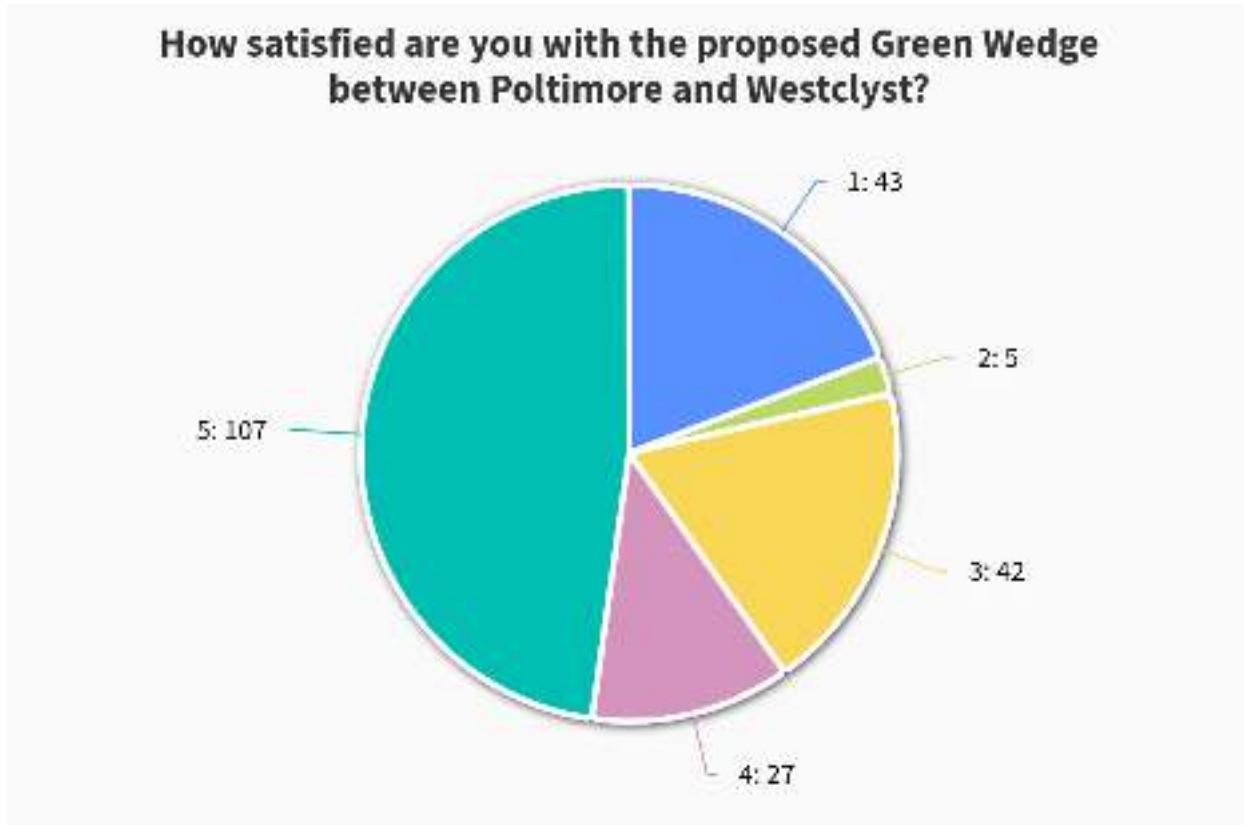
Statutory organisations summary

Devon County Council

Minerals note that this Green Wedge is within a Mineral Safeguarding Area, where nearby mineral resources are protected from sterilisation or constraint. Mineral workings are considered greenfield once restored which appears compatible with the policy wording proposed.

Poltimore and Westclyst

Total responses: 224



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge between Poltimore and Westclyst overwhelmingly express strong support for the green wedge. Respondents emphasise the importance of preserving the distinct identities of the two settlements, as well as protecting the natural environment, wildlife habitats, and the historic setting of Poltimore House and grounds. Many express concerns about the area's current infrastructure being unable to support further development, citing issues with roads, schools, and other services. There is a clear desire to prevent the merging of Poltimore and Westclyst, and to respect the existing designations of the area, including the Poltimore Park and the Clyst Valley Regional Park.

Key points raised, in order of frequency:

- Maintaining distinct identities of Poltimore and Westclyst

- Importance of preserving the separation between the two settlements
 - Preventing the merging of the two communities
- Environmental and landscape protection
 - Preservation of wildlife habitats and biodiversity
 - Importance of maintaining the area's natural beauty and rural character
- Historic preservation of Poltimore House and grounds
 - Protecting the setting and views of the historic Poltimore House
 - Preventing development that would impact the heritage of the area
- Infrastructure concerns
 - Inadequate roads, schools, and other services
 - Inability of current infrastructure to support additional development
- Recreational value and public access
 - Importance of the area for walking, leisure, and community well-being
- Opposition to development within the green wedge
 - Criticism of any proposed development within the green wedge
- Support for the green wedge
 - Calls for the green wedge to be maintained or expanded
- Concerns about specific development proposals
 - Disagreement about the inclusion or exclusion of certain areas within the green wedge

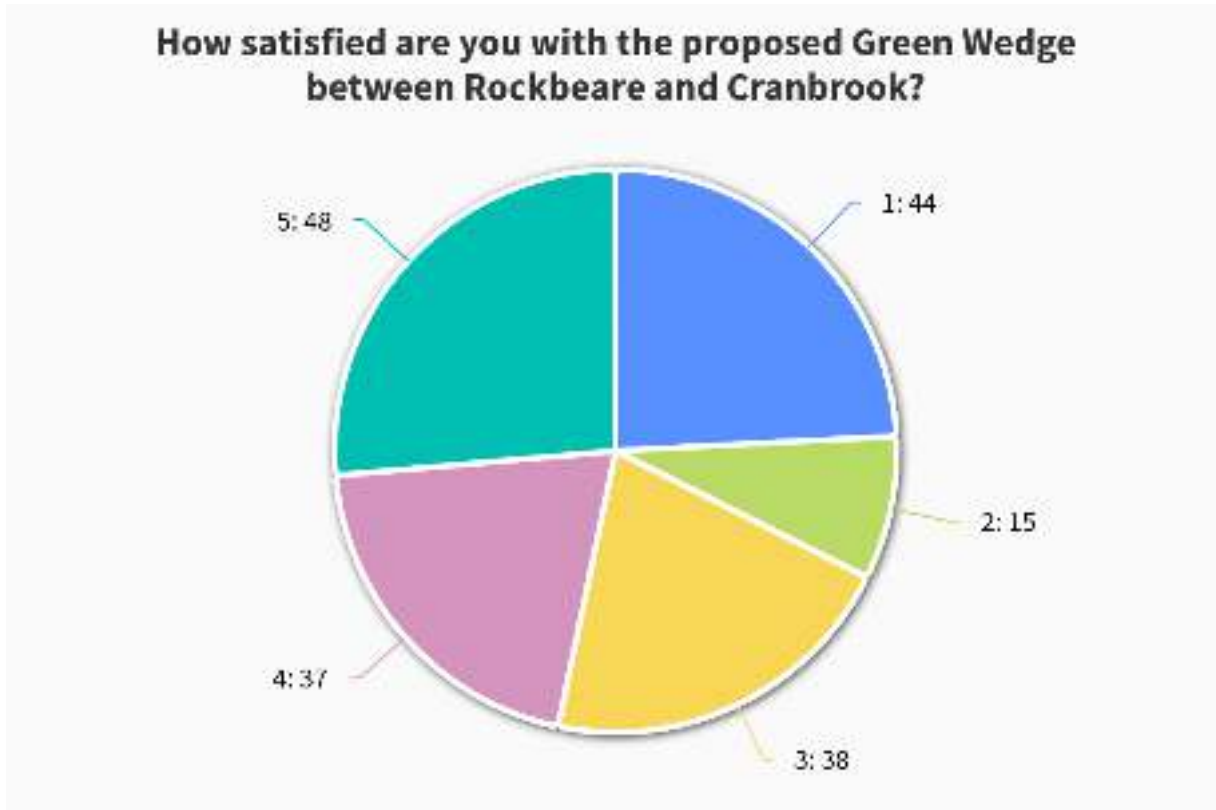
Statutory organisations summary

Historic England

Support the retention of the Green Wedge at Poltimore Park. The park is a non-designated heritage asset in its own right and forms an important part of the setting of Grade II* listed Poltimore House.

Rockbeare and Cranbrook

Total responses: 182



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge between Rockbeare and Cranbrook express a strong desire to maintain and potentially expand the green wedge. Respondents emphasise the importance of preventing the merging of the two settlements and preserving the distinct identities of Rockbeare and Cranbrook. Many are concerned about the rapid expansion of Cranbrook and the potential impact it could have on the surrounding rural character and villages. There are also concerns about the current infrastructure's inability to support further development in the area.

Key points raised, in order of frequency:

- Maintaining distinct identities of Rockbeare and Cranbrook
 - Importance of preserving the separation between the two settlements

- Preventing the merging of Rockbeare and Cranbrook
- Concerns about the expansion of Cranbrook
 - Criticism of the rapid growth of Cranbrook
 - Desire to limit further expansion of Cranbrook
- Infrastructure concerns
 - Inadequate roads, schools, and other services
 - Inability of current infrastructure to support additional development
- Environmental and landscape protection
 - Preservation of remaining green spaces and rural character
- Opposition to development within the green wedge
 - Criticism of any proposed development within the green wedge
- Support for the green wedge
 - Calls for the green wedge to be maintained or expanded
- Concerns about specific proposals
 - Disagreement about the inclusion or exclusion of certain areas within the green wedge
 - Potential conflict with Cranbrook DPD

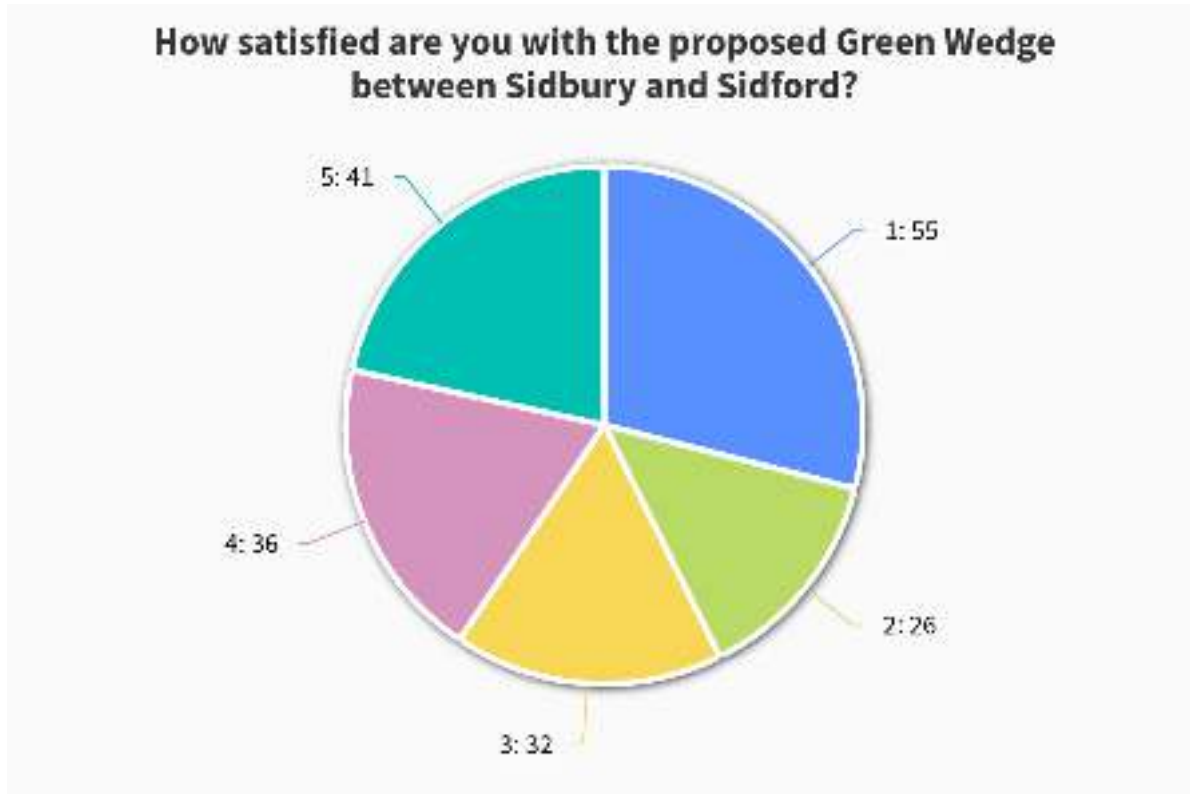
Statutory organisations summary

Devon County Council

Education notes the overlap of the existing Treasbeare Expansion Zone area and the proposed Green Wedge Area. The land in this area of overlap is expected to be transferred to DCC as education land by the Treasbeare Expansion Area developers under the signed s106 agreement in order for DCC to deliver a primary school on the site, as required by the Cranbrook Plan. As such, DCC requests that this area of overlap (falling within the Treasbeare Expansion Zone) is removed from the proposed Green Wedge area.

Sidbury and Sidford

Total responses: 190



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the proposed Green Wedge between Sidbury and Sidford display overwhelming opposition to any development within this area. Respondents emphasise the importance of maintaining the separation and distinct identities of these two villages, which they feel would be irreparably damaged by encroaching development. There are strong concerns about the impact on the local environment, biodiversity, and the ability of the existing infrastructure to support additional housing or employment uses.

Many feel the proposed Green Wedge does not go far enough to protect this sensitive area, and that the boundaries should be expanded to provide greater safeguards. There are specific objections to the inclusion of site Sidm_□□a within the proposed Green Wedge, as this is seen as undermining the purpose and integrity of the designation. Respondents argue that Sidm_□□a and other development sites like the Sidford Business Park should be excluded from the Green Wedge.

Key points raised:

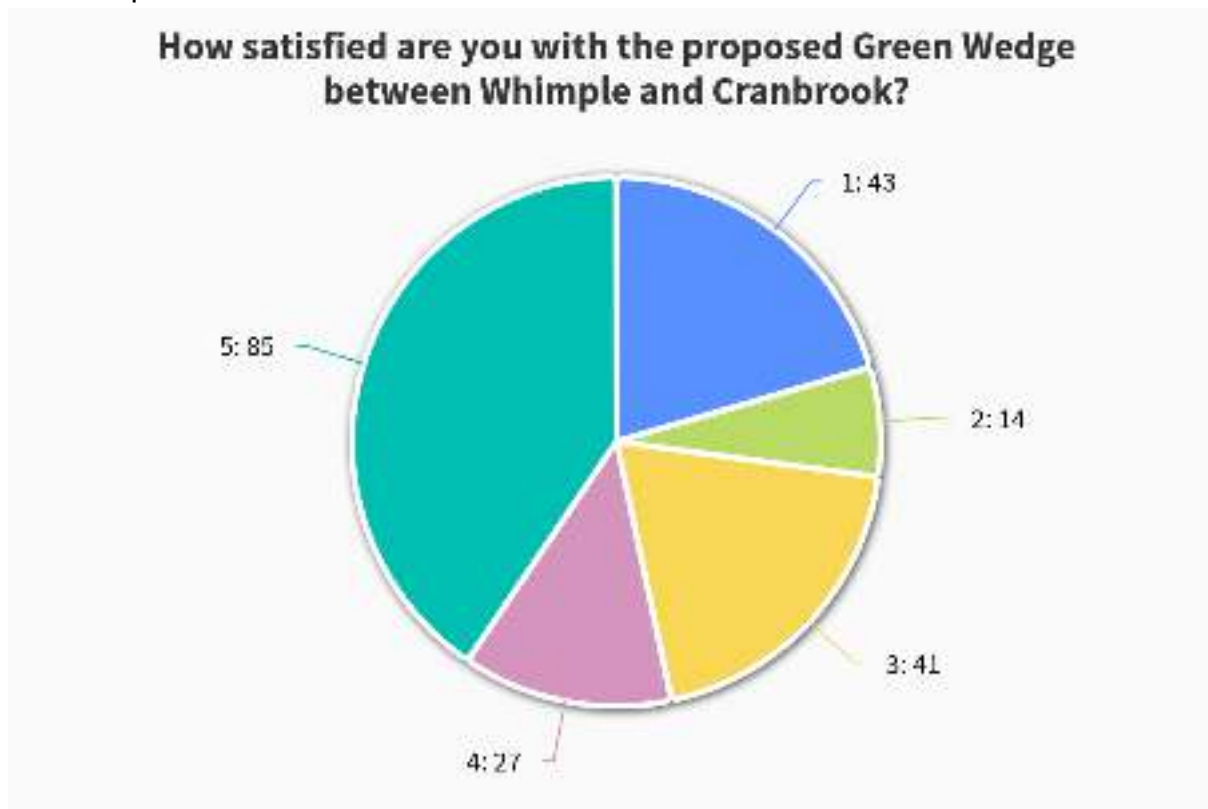
- Strong opposition to any development within the proposed Green Wedge
 - Concerns about loss of separation and distinct identities of Sidbury and Sidford
 - Fears about environmental impacts, loss of biodiversity, and pressure on infrastructure
- Calls for expanding the boundaries of the proposed Green Wedge
 - Desire for stronger protections and wider buffers between the villages
- Specific objections to including site Sidm_□□a within the Green Wedge
 - View that this undermines the purpose and effectiveness of the designation
 - Requests for Sidm_□□a and other development sites to be excluded
- Concerns about existing development pressure and planning permissions
 - Criticism of the Sidford Business Park site as an example of encroachment
 - Calls for lapsing or revisiting previously granted planning permissions
- Doubts about the council's commitment to protecting the Green Wedge
 - Skepticism that the designation will be upheld against development pressures
- Warnings about the impacts of increased traffic and flooding issues
 - Road network and drainage infrastructure seen as unable to cope with more development
- Questioning the need for additional housing given local demographics
 - Doubts about demand, especially for affordable homes vs. second homes

Statutory organisations summary

None

Whimble and Cranbrook

Total responses: 160



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses to the question about the proposed Green Wedge between Whimble and Cranbrook overwhelmingly express satisfaction with the Green Wedge and the need to maintain it to preserve the distinct identity and character of Whimble as a separate community from the larger development of Cranbrook. Respondents emphasise the importance of preventing the coalescence of the two settlements and maintaining Whimble's rural village setting. Many raise concerns about the capacity of Whimble's infrastructure, particularly roads, schools, and sewage systems, to accommodate further development and growth. There are calls for the Green Wedge to be expanded in size to provide even stronger protection for Whimble.

Key points raised, in order of frequency:

- Support for the Green Wedge and the need to prevent Cranbrook's expansion towards Whimble
 - Preservation of Whimble's distinct identity and character as a village
 - Concerns about Cranbrook encroaching on and merging with Whimble
- Infrastructure and capacity concerns
 - Inability of Whimble's roads, schools, and services to accommodate more development
 - Worries about the impact of additional growth on the village
- Calls for the Green Wedge to be expanded in size
 - Desire for stronger protection and separation between Whimble and Cranbrook
 - Concerns that the current proposed size is insufficient
- Appreciation for the existing Green Wedge and desire to maintain it
 - Recognition of the importance of preserving the rural character and natural environment
- Scepticism or opposition to the Green Wedge
 - Concerns that the Green Wedge is unnecessary or could be used to prevent needed development
 - Preference for more integrated development between Whimble and Cranbrook

Statutory organisations summary

None

Other comments

Do you have any other comments on the proposed Green Wedges?

The responses to the question about the proposed Green Wedges overwhelmingly express strong support for maintaining and even expanding the designated green wedges in East Devon. There is a clear sentiment that the green wedges are essential for preserving the identity, character, and natural environment of the individual towns, villages, and communities in the region. Respondents emphasise the importance of the green wedges for protecting wildlife habitats, maintaining rural landscapes, and providing valuable recreational and wellbeing benefits to residents.

Many are concerned that the proposed policies do not go far enough to safeguard the green wedges from future development, and that loopholes could allow encroachment and erosion of these important green spaces over time. There are calls for the green wedge boundaries to be clearly defined, legally protected, and for development within them to be prohibited except in the most exceptional circumstances.

Key points raised, in order of frequency:

- Strong support for maintaining and expanding green wedges

- Essential for preserving community identity and character
- Protecting natural environments, wildlife habitats, and rural landscapes
- Providing recreational and wellbeing benefits for residents
- Concerns about lack of robust protection for green wedges
 - Worries about potential loopholes allowing future development
 - Calls for clear legal protection and prohibition on development
- Importance of defining and maintaining clear green wedge boundaries
 - Ensuring boundaries are accurately mapped and enforced
 - Preventing gradual erosion or "creep" of development into green wedges
- Preference for development on brownfield sites rather than green wedges
 - Emphasis on utilising existing built-up areas and infrastructure
- Criticism of the consultation process
 - Concerns about lack of public awareness and advertising of the consultation
 - Desire for clearer, more accessible information and documentation
- Specific proposals for expanding or creating new green wedges
 - Suggestions for additional green wedges in areas like Poltimore and between Exeter and East Devon
- Concern over application of green wedge policy
 - Suggestions that green wedges restrict development and are a crude, blanket tool that isn't compliant with the NPPF.
- Importance of green wedges for food production and sustainability
 - Preserving prime agricultural land and local food growing capacity

Statutory organisations summary

Devon County Council

Historic Environment welcome the green wedges which will help to conserve many areas of archaeological and historic landscape value.

Ref 114 – Respondent objects to all of the Green Wedge being designated and specifically highlights their clients land that should not be included. They consider that the Green Wedge fails to meet the stated reasons in the consultation for designation and the defined area is not supported by evidence/assessment.



Ref 40b The respondent objects to the proposed Budleigh Salterton and Knowle Green Wedge, arguing it's too large. They propose a smaller area, claiming existing National Landscape protection is sufficient and reducing the need for a wider Green Wedge.



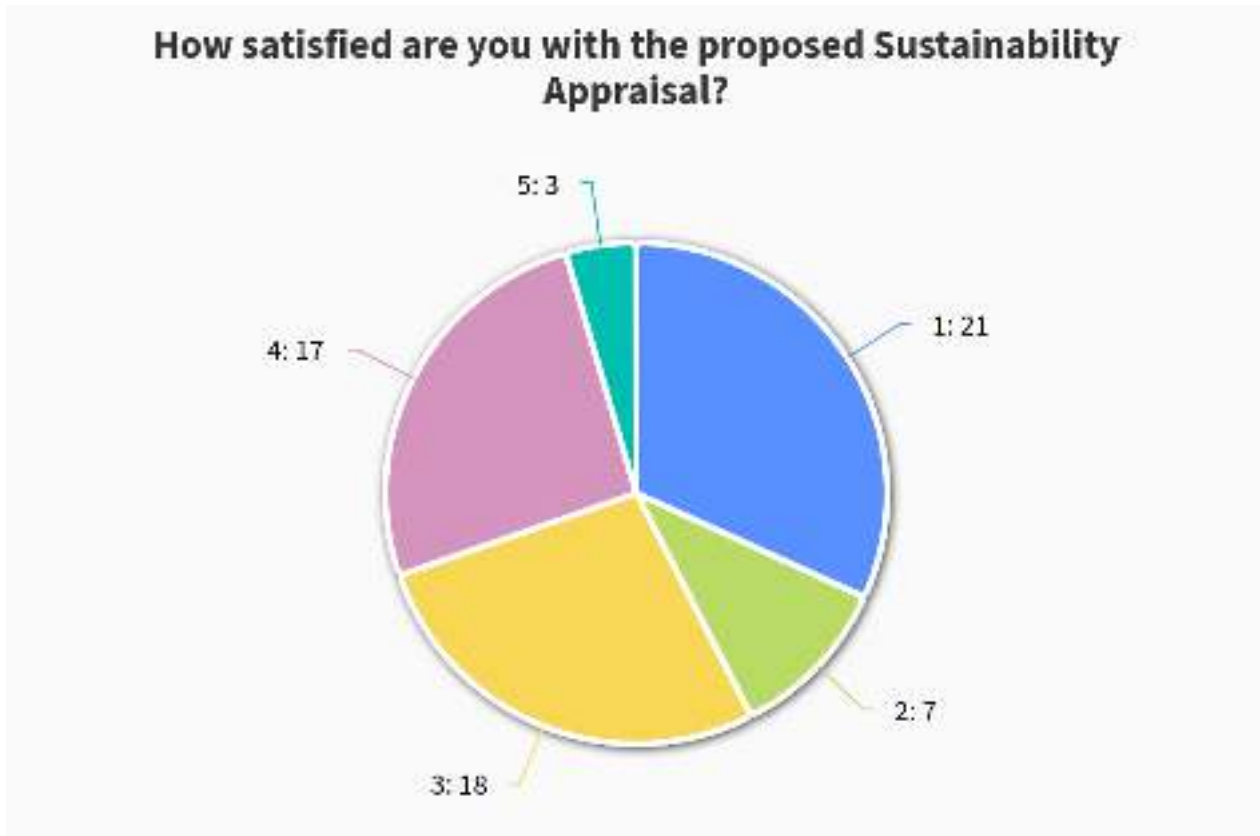
Ref 103 The submission supports Sidmouth Town Council's position on maintaining the Green Wedge between Sidford and Sidbury. The proposed development sites, Sidm_06a and Sidm_29, would significantly reduce the separation

<p>between the two communities, potentially causing similar issues to those faced by Sidford. The submission highlights public concerns about flooding at Sidm_06a and the lack of progress on the neighbouring development site, Sidm_29. It concludes that both sites are essential to preserving the Green Wedge and should be retained.</p>	
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13. Sustainability Appraisal

General Comments

Total responses: 66



5 - Very satisfied

1 - Not at all satisfied

Why do you feel this way and do you have any other comments?

The responses regarding the proposed Sustainability Appraisal express a range of views, with some support though there is a general sentiment that the appraisal process has significant weaknesses that undermine the strength and effectiveness of the overall Local Plan. Many respondents feel the Appraisal does not adequately address key sustainability issues, particularly in relation to water quality, sewage infrastructure, and the impact of development on the natural environment and biodiversity.

There are calls for the Sustainability Appraisal to be thoroughly reviewed and updated, with a stronger emphasis on protecting the environment, promoting renewable energy, and ensuring

new development is truly sustainable. Several respondents highlight concerns that the Appraisal appears to be used primarily as a box-ticking exercise rather than a meaningful tool to guide policy decisions.

Key points raised, in order of frequency:

- Concerns about the Appraisal's lack of focus on water quality, sewage infrastructure, and flood risk
 - Failure to properly consider the importance of these issues and their impact on sustainability
 - Calls for a more robust, catchment-based approach to water management
- Criticism of the Appraisal's perceived bias towards large-scale, standalone developments
 - Concerns that the Appraisal is designed to confirm existing council policies
 - Preference for smaller, more integrated developments near existing centres
- Requests for the Appraisal to place a stronger emphasis on protecting the natural environment, biodiversity, and addressing climate change
 - Desire for more radical, innovative policies that prioritise environmental protection
 - Concerns that the Appraisal does not adequately address these critical issues
- Views that the Appraisal is too complex, lengthy, and inaccessible for the public to engage with effectively
 - Suggestions that the key points should be summarised and presented in a more accessible format
 - Concerns that the Appraisal will have little influence on policy decisions
- Scepticism about the objectivity and transparency of the Appraisal process
 - Perceptions that the Appraisal is a subjective, box-ticking exercise
 - Lack of clear, publicly available information and scoring systems
- Calls for the Appraisal to better reflect local knowledge and lived experiences regarding sustainability issues
 - Concerns that local expertise has been discounted or overlooked
 - Desire for the Appraisal to be more grounded in the realities of specific communities
- General dissatisfaction with the Appraisal and the broader sustainability approach of the Local Plan
 - Beliefs that the Council is not doing enough to address sustainability
 - Concerns that the plan does not meet the needs of local communities

Statutory organisations summary

Historic England

Note that it should not be assumed that in all circumstances the presence of listed buildings on site means that development would result in an adverse impact – need to understand the significance of the asset and likely impact of development on that significance.

Environment Agency

State para 3.11 should state the River Otter as being at poor ecological status and the River Clyst as moderate ecological status. The River Axe should be identified for its unfavourable condition status.

Refer to the East Devon Abstraction Licensing Strategy and Water Abstraction Plan 2017 – the increased demand for water supply and associated infrastructure requirements from new development should be considered.

NHS Integrated Care Board (ICB)

State the positive rating given to whether a site is within a certain distance to a GP surgery does not consider whether there is physical capacity to accommodate any further patients e.g. Western side of East Devon, Exmouth, Woodbury.

State the mitigation measure of providing healthcare facilities along new housing is not always viable – mitigation must also include plans to expand existing facilities.

Natural England

Where a site triggers a SSSI Impact Risk Zone (IRZ), then it will be necessary to assess (through the SA/SEA) whether there is a potential impact pathway between the development and the site.

