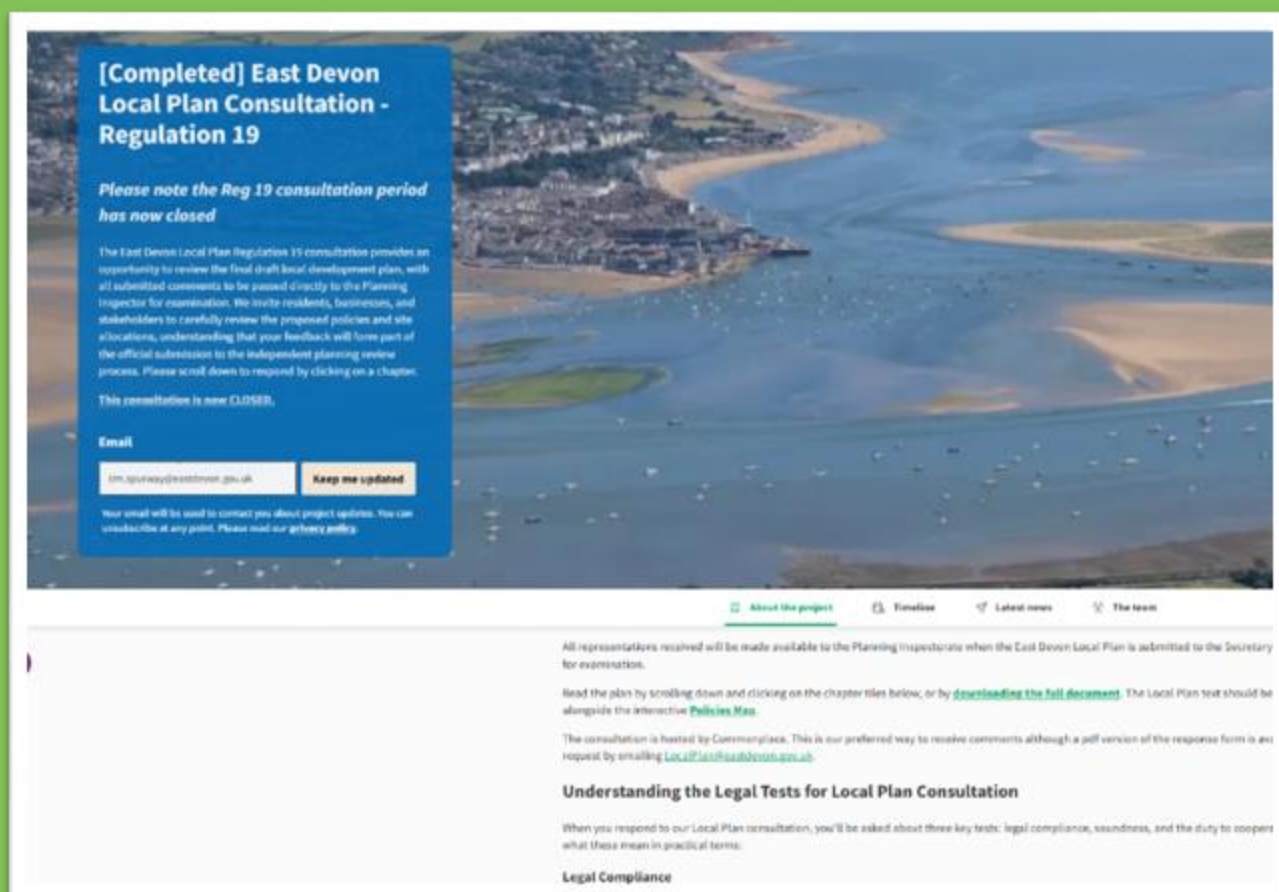


# Draft Feedback Report

## East Devon Local Plan (Regulation 19)

### Consultation (13 Feb to Monday 31 March 2025)

A screenshot of the East Devon Local Plan Consultation website. The top section has a blue background with white text. It says "[Completed] East Devon Local Plan Consultation - Regulation 19". Below that, it says "Please note the Reg 19 consultation period has now closed". There is a paragraph of text explaining the consultation process. Below that is an email sign-up section with a text input field containing "dm.spruway@eastdevon.gov.uk" and a "Keep me updated" button. At the bottom of the blue section, it says "Your email will be used to contact you about project updates. You can unsubscribe at any point. Please read our privacy policy." The background of the website is a large aerial photograph of a coastal area with a town and a bay. Below the blue section, there is a navigation bar with links: "About the project", "Timeline", "Latest news", and "The team". The main content area has a white background and contains text about the consultation process, including a link to "download the full document" and a link to "LocalPlan@eastdevon.gov.uk". It also has a section titled "Understanding the Legal Tests for Local Plan Consultation" with sub-sections for "Legal Compliance" and "Soundness".

## Executive summary

### Executive Summary

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

### Key Themes and Issues Raised

- **Volume and Focus of Responses:** The most commented-on policy was SD01, particularly the proposed allocation of site Exmo\_20, which drew over 1,100 responses and multiple petitions. Concerns centred on biodiversity, flood risk, infrastructure, and procedural fairness.
- **Housing Strategy:** There was widespread objection to the housing requirement figure of 20,909 dwellings (80% of the standard method), with calls to meet the full need of 26,136 dwellings. Respondents also criticised the stepped trajectory and over-reliance on a single new settlement.
- **Spatial Strategy and Settlement Hierarchy:** While there was broad support for focusing growth in the West End and Main Centres, concerns were raised about the under-classification of certain settlements (e.g. Feniton) and the underrepresentation of Exmouth's strategic role.
- **Infrastructure and Viability:** Many responses highlighted the need for stronger commitments to infrastructure delivery, particularly for healthcare, education, and utilities. Viability concerns were raised across multiple policies, especially in relation to affordable housing, climate policies, and biodiversity net gain.
- **Environmental Protection:** There was strong support for policies promoting biodiversity, climate resilience, and landscape protection. However, several policies were criticised for being overly rigid, duplicative of national guidance, or lacking clarity on implementation.
- **Sustainability Appraisal and Legal Compliance:** Numerous representations challenged the soundness and legal compliance of the Sustainability Appraisal, particularly regarding the allocation of Exmo\_20. Concerns included inconsistencies with the HELAA, lack of consultation, and failure to apply the Mitigation Hierarchy.
- **Neighbourhood Plans and Community Engagement:** Respondents expressed frustration over the perceived marginalisation of neighbourhood plans and the usability of consultation tools. There were calls for greater transparency, responsiveness, and respect for local input.

### Areas of Support

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

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

### **Next Steps**

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

DRAFT

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## The approach to consultation

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

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

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

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

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

The report breaks down the total number of responses made by policy. Approximate numbers are also provided for sites. It is noted that the two figures may not add up, as people often commented on multiple sites or topics in a single submission. The most commented-on policy by a considerable margin was Policy SD01, specifically the proposed allocation of site Exmo\_20. This site attracted a high volume of responses, including multiple petitions objecting to its inclusion. These are summarised in the relevant section of this report.

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

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

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

- Honi\_15
- Wood\_24
- Brhe\_07

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

## Response summaries

### 1. Introduction

**Total responses: 84**

#### **Main Issues:**

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

#### **Calls for:**

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

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

## 2. The Vision

**Total responses: 47**

### **Main Issues:**

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

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

**Calls for:**

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

### **3. Spatial Strategy**

**Total responses: 293**

#### **SP01: Spatial strategy**

**Total responses: 83**

**Main Issues:**

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

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

**Calls for:**

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

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## **SP02: Levels of future housing development**

**Total responses: 70**

**Main Issues:**

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

**Calls for:**

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

transitional compliance under the NPPF. (Planning Consultants)

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

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### **SP03: Housing requirement by Designated Neighbourhood Area**

**Total responses: 21**

#### **Main Issues:**

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

#### **Calls for:**

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

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### **SP04: Employment provision and distribution strategy**

**Total responses: 18**

#### **Main Issues:**



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

**Calls for:**

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

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## **SP05: Development inside Settlement Boundaries**

**Total responses: 5**

**Main Issues:**

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

**Calls for:**

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

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**SP06: Development beyond Settlement Boundaries**

**Total responses: 14**

**Main Issues:**

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

**Calls for:**

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

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**SP07: Delivery of infrastructure**

**Total responses: 27**

**Main Issues:**

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

**Calls for:**

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

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## **SP08: Phased Delivery of Infrastructure and Services**

**Total responses: 16**

**Main Issues:**

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

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

**Calls for:**

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

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## **4. Development in the West End**

**Total responses: 166**

### **WS01: Development of a second new community east of Exeter**

**Total responses: 65**

**Main Issues:**

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

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

**Calls for:**

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

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## **WS02: Development within the Enterprise Zone**

**Total responses: 2**

**Main Issues:**

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

**Calls for:**

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

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**WS03: Exeter Science Park**

**Total responses: 1**

**Main Issues:**

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

**Calls for:**

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

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**WS04: Land north of the Science Park**

**Total responses: 2**

**Main Issues:**

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

**Calls for:**

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

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**WS05: Exeter Airport and its future operation and development**

**Total responses: 3**

**Main Issues:**

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

**Calls for:**

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

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

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## **WS06: Land east of the airport**

**Total responses: 7**

### **Main Issues:**

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

### **Calls for:**

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

---

## **WS07: Employment land north of the airport, adjoining Treasbeare**

**Total responses: 4**

### **Main Issues:**

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

### **Calls for:**

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

---

## **WS08: Employment land opposite airport buildings, south of A30**

**Total responses: 4**

### **Main Issues:**

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

### **Calls for:**

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

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

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## **WS09: Clyst Valley Regional Park**

**Total responses: 23**

### **Main Issues:**

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

### **Calls for:**

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

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## **WS10: Development next to the M5 and north of Topsham**

**Total responses: 16**

### **Main Issues:**

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



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

**Calls for:**

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

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### **WS11: Gypsy and traveller site east of M5**

**Total responses: 16**

**Main Issues:**

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

**Calls for:**

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

---

### **WS12: Employment land at Sandygate**

**Total responses: 1**

**Main Issues:**

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

**Calls for:**

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

---

### **WS13: Employment land at Lodge Trading Estate, Broadclyst**

**Total responses: 4**

**Main Issues:**

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

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

**Calls for:**

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

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

**Total responses: 0**

**Main Issues:**

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

**Calls for:**

- No specific calls for change identified.

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**WS15 – Darts Farm**

**Total responses: 7**

**Main Issues:**

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

**Calls for:**

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

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**5. Development in the Towns and Villages**

**Total responses: 1867**

**SD01 - Exmouth and its development allocations**

**Total responses: 1398**

**Exmo\_20 – Land at St John's**  
**(approx. 1110 responses)**

**Main Issues:**

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

**Calls for:**

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

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**Exmo\_17 – Land to the South of Littleham**  
(approx. 115 responses)

**Main Issues:**

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

**Calls for:**

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

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**Exmo\_23 – Land to the South of Courtlands Lane**  
(approx. 13 responses)

**Main Issues:**

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

**Calls for:**

- Consideration of visual impact mitigation. (National Trust)

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**Lymp\_07 – Land at Courtlands Cross**  
(approx. 18 responses)

**Main Issues:**

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

**Calls for:**

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

**Exmo\_47 – Land west of Hulham Road**  
(approx. 7 responses)

**Main Issues:**

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

**Calls for:**

- Heritage impact assessments. (Historic England)
- 

**Lymp\_14 and Exmo\_04a – Coles Field and Marley Drive**  
(approx. 7 responses)

**Main Issues:**

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

**Calls for:**

- Enhanced biodiversity protection measures. (Natural England)
- 

**SD02: Axminster and its development allocations**

**Total responses: 28**

**Axmi\_22 - Land east of Lyme Road**  
(approx. 4 responses)

**Main Issues:**

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

**Calls for:**

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

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

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

**Main Issues:**

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

**Calls for:**

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

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

**Main Issues:**

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

**Calls for:**

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

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**Axmi\_01a - Land west of Musbury Road**  
(approx. 3 responses)

**Main Issues:**

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

**Calls for:**

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

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**Axmi\_02, Axmi\_08, Axmi\_09 - Land east of Musbury Road**  
(approx. 6 responses)

**Main Issues:**

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

**Calls for:**

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

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**Axmi\_11c - Land east of Lyme Close**  
(approx. 1 response)

**Main Issues:**

- Confusion over site reference inconsistencies (Axmi\_11a vs Axmi\_11c). (Individual)

**Calls for:**

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

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**Axmi\_23 - Websters Garage, 9 Lyme Street**  
(approx. 1 response)

**Main Issues:**

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

**Calls for:**

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

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**Axmi\_24 – Land west of Prestaller Farm**  
(approx. 1 response)

**Main Issues:**

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

**Calls for:**

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

## **SD03: Honiton and its development allocations**

**Total responses: 51**

### **Gitti\_03, Gitti\_04 and Gitti\_05 - Land west of Hayne Lane (approx. 8 responses)**

#### **Main Issues:**

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

#### **Calls For:**

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

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### **Honi\_06 - Former Millwater School at Honiton Bottom Road (approx. 1 response)**

#### **Main Issues:**

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

#### **Calls For:**

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

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### **Honi\_07 and Honi\_12 – Land adjacent to St Michael’s Church and south east of Cuckoo Down Lane (approx. 4 responses)**

#### **Main Issues:**

- Statement in policy that Honi\_12 is dependent on Honi\_07 for access is challenged due to separate ownership and potential for independent access. (Planning consultant on behalf of landowners)
- Concerns about landscape and heritage impact due to proximity to listed buildings and location within a National Landscape. (Town Council, Historic England)
- Legal compliance concerns over consultation process and late inclusion of Honi\_12. (Town Council)

#### **Calls For:**

- Amend policy to allow for independent access to Honi\_12 via Higher Brand Lane. (Planning consultant)
- Restrict Honi\_07 to open space only, with built development limited to Honi\_12. (Historic England)

- Remove Honi\_07 and Honi\_12 from the plan due to landscape and heritage concerns. (Town Council)

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**Honi\_10 – Land at Ottery Moor Lane**  
(approx. 1 response)

**Main Issues:**

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

**Calls For:**

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

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**Honi\_13 – Land at Middle Hill, Church Hill**  
(approx. 5 responses)

**Main Issues:**

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

**Calls For:**

- Remove Honi\_13 from the plan due to cumulative landscape and heritage impacts. (Historic England)

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**Honi\_14 – Land at Northcote Hill**  
(approx. 1 response)

**Main Issues:**

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

**Calls For:**

- Reinstate the original settlement boundary to exclude Honi\_14. (Individual)

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**Honi\_18 – Land at Kings Road**  
(approx. 10 responses)

**Main Issues:**

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

**Calls For:**

- Remove Honi\_18 from the plan. (Town Council, Public)
- Reconsider alternative sites with less impact and better infrastructure. (Individuals)
- Ensure any development includes significant mitigation for access and landscape impact. (Historic England)



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

**Main Issues:**

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

**Calls For:**

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

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

**Main Issues:**

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

**Calls For:**

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

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

**Main Issues:**

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

**Calls For:**

- None.
-

## **SD04: Ottery St Mary and its development allocations**

**Total responses: 22**

### **Otry\_01b – Barrack Farm**

**(approx. 2 responses)**

#### **Main Issues:**

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

#### **Calls for:**

- Adjust the developable area to mirror Otry\_09 and ensure industrial land is located to the west to avoid conflict with residential areas. (Developer)

---

### **Otry\_09 – Land at Thorne Farm**

**(approx. 5 responses)**

#### **Main Issues:**

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

#### **Calls for:**

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

---

### **Otry\_10 – Land at Salston Barton**

**(approx. 6 responses)**

#### **Main Issues:**

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

#### **Calls for:**

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

---

### **Otry\_15 – Land at Bylands, Slade Road**

**(approx. 3 responses)**

#### **Main Issues:**

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

**Calls for:**

- Improve footpath infrastructure before development. (Town Council)

---

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

**Main Issues:**

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

**Calls for:**

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

---

**Otry\_21 – Gerway Farm**  
**(approx. 4 responses)**

**Main Issues:**

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

**Calls for:**

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

**SD05: Seaton and its development allocations**

**Total responses: 30**

**Seat\_02 – Land at Barnards Hill Lane**  
**(approx. 6 responses)**

**Main Issues:**

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

**Calls for:**

- Remove Seat\_02 from the Local Plan due to environmental, infrastructure, and landscape concerns. (Individuals)
- Consider alternative access via Lime Way. (Developer)
- Confirm site availability and support allocation. (Planning Consultant on behalf of landowner)

---

### **Seat\_03 – Land to the south of Harepath Hill (approx. 6 responses)**

#### **Main Issues:**

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

#### **Calls for:**

- Remove Seat\_03 from the Local Plan. (Individuals, Public bodies)
- Add requirement for archaeological survey. (Historic England)
- Reword contour reference to allow flexibility based on LVIA. (Developer)

---

### **Seat\_05 – Land off Harepath Road (approx. 8 responses)**

#### **Main Issues:**

- Objection to development on Green Wedge and high-quality agricultural land. (Individuals, Public bodies)
- Impact on Beer Quarry and Caves SAC bat pinch point. (Public body – Natural England)
- Concerns about flooding, drainage, and impact on Seaton Wetlands. (Individuals)
- Inadequate infrastructure and public transport. (Individuals)
- Concerns about coalescence with Colyford and loss of landscape character. (Individuals)
- Need for coordinated access and delivery with Seat\_03. (Public body – Devon County Council)

#### **Calls for:**

- Remove Seat\_05 from the Local Plan. (Individuals, Public bodies)
- Amend policy to clarify access and allow phased delivery. (Developer)
- Reword policy to allow flexibility in delivery timing and access options. (Developer)

---

### **Seat\_13a – Land west of Axeview Road (approx. 2 responses)**

#### **Main Issues:**

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

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

**Calls for:**

- Remove Seat\_13a from the Local Plan. (Public body – Historic England)
- Require archaeological assessment and mitigation wording for SAC bats. (Public bodies – Historic England, Natural England)

## **SD06: Sidmouth and its development allocations**

### **Total responses: 21**

#### **Sidm\_01 – Land south-west of Woolbrook Road**

**(approx. 1 response)**

**Main Issues:**

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

**Calls for:**

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

---

#### **Sidm\_06a – Land west of Two Bridges Road, Sidford**

**(approx. 2 responses)**

**Main Issues:**

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

**Calls for:**

- Remove Sidm\_06a from the Local Plan due to landscape, flooding, and coalescence concerns. (Amenity group)

---

#### **Sidm\_31 – Land east of Burscombe Lane / west of Windsor Mead**

**(approx. 6 responses)**

**Main Issues:**

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

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

**Calls for:**

- Remove Sidm\_31 from the Local Plan due to access, landscape, biodiversity, and process concerns. (Individuals, Amenity group)

## **SD07: Development allocations at Broadclyst**

**Total responses: 20**

### **Brcl\_12 – Land west of Whimble Road, Broadclyst**

**(approx. 6 responses)**

**Main Issues:**

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

**Calls for:**

- Remove Brcl\_12 from the Local Plan or reduce housing numbers to 70 and limit to southern field. (Individuals, Parish Council)
- Require infrastructure upgrades for drainage, sewage, roads, schools, and healthcare. (Parish Council)
- Amend policy to allow up to 145 homes and consolidate employment land delivery. (Developer)
- Add policy wording to protect heritage assets and support active travel links. (Historic England, National Trust)

---

### **Brcl\_29 – Land to east of Town End, Broadclyst**

**(approx. 5 responses)**

**Main Issues:**

- Site's viability depends on coordinated access through Brcl\_12. (National Trust, Planning Consultant)

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

**Calls for:**

- Maintain requirement for a joint masterplan with Brcl\_12. (National Trust, Planning Consultant)
- Allow flexibility to deliver combined employment land across both sites. (National Trust)
- Strengthen policy to support pedestrian and cycle connectivity. (National Trust)
- Include heritage-sensitive design principles. (Historic England)

---

## **SD08: Development allocations at Budleigh Salterton**

**Total responses: 9**

### **Budl\_02 – Land at Barn Lane, Knowle, Budleigh Salterton (approx. 5 responses)**

**Main Issues:**

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

**Calls for:**

- Provide infrastructure upgrades and ensure safe pedestrian links to the primary school before development proceeds. (Individuals)
- Allocate more land for housing to meet local needs and avoid demographic imbalance. (Individual)
- Retain Budl\_02 as the preferred site for housing in Budleigh due to its relative suitability and containment. (Developer, Individuals)
- Recognise that the proposal does not constitute "major development" in the National Landscape and is visually and environmentally acceptable. (Developer)

---

## **SD09 – Development allocations at Colyton**

**Total responses: 8**

### **Coly\_02 - Land at Hillhead (approx. 1 response)**

**Main Issues:**

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

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

**Calls for:**

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

---

**Land adjacent to the Peace Memorial Playing Fields (Coly\_06a)**

**Main Issues:**

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

**Calls for:**

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

---

**SD10 – Development allocations at Lypstone**

**Total responses: 20**

**Lymp\_01 – Little Paddocks, 22 Underhill Crescent  
(approx. 3 responses)**

**Main Issues:**

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

**Calls for:**

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

---

**GH/ED/72a – Land at Meeting Lane**

**Main Issues:**

**(approx. 9 responses)**

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

**Calls for:**

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

---

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

**Main Issues:**



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

**Calls for:**

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

---

## **SD11 – Development allocations at Woodbury**

**Total responses: 11**

### **Wood\_06 – Land to rear of Orchard House, Globe Hill (approx. 2 responses)**

**Main Issues:**

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

**Calls for:**

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

---

### **Wood\_09 – Land off Globe Hill (approx. 2 responses)**

**Main Issues:**

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

**Calls for:**

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

---

### **Wood\_10 – Land at Gilbrook (approx. 2 responses)**

**Main Issues:**

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

**Calls for:**

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

---

### **Wood\_16 – Land south of Broadway (approx. 2 responses)**

**Main Issues:**

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

**Calls for:**

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

---

### **Wood\_20 – Land east of Town Lane**

**(approx. 1 response)**

**Main Issues:**

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

**Calls for:**

- Prioritise sites with better access. (Individual)

---

**SD12: Development allocation at Broadhembury**

**Total responses: 2**

**Brhe\_09 – Land opposite the Village Hall**

**(2 responses)**

**Main Issues:**

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

**Calls for:**

- Remove the allocation of Brhe\_09 from the plan due to scale, heritage, and landscape impacts. (Parish Council)
- Consider alternative sites within the village that would result in less harm. (Parish Council)

---

**SD13: Development allocation at Chardstock**

**Total responses: 4**

**Char\_04a – Land off Green Lane**

**(4 responses)**

**Main Issues:**

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

**Calls for:**

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

---

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

**Total responses: 6**

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

**Main Issues:**

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

**Calls for:**

- Replace SD14 with a direct allocation in the Local Plan for at least 72 dwellings. (Planning Consultants)
- Allocate alternative site (Sowt\_09) based on deliverability and evidence. (Planning Consultants)
- Include access considerations and discourage through traffic. (Devon County Council)

---

**SD15: Development allocation at Dunkeswell**

**Total responses: 2**

**Dunk\_05 – Broomfields  
(2 responses)**

**Main Issues:**

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

**Calls for:**

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

---

**SD16: Development allocation at East Budleigh**

**Total responses: 6**

**Ebud\_01 – Land off Frogmore Road  
(6 responses)**

**Main Issues:**

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

**Calls for:**

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

---

**SD17: Development allocations at Exton**

**Total responses: 12**

**Wood\_01 – Land west of Oaklands  
(approx. 3 responses)**

**Main Issues:**

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

**Calls for:**

- Retain allocation and ensure pedestrian/cycle links to Wood\_28. (Planning Consultants)
- Include requirement for a joint masterplan. (Devon County Council)

**Wood\_28 – Land north and east of Exton Farm**

**(approx. 8 responses)**

**Main Issues:**

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

**Calls for:**

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

---

**SD18: Development allocations at Feniton**

**Total responses: 54**

**Feni\_05 – Land at Burlands Mead**

**(approx. 7 responses)**

**Main Issues:**

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

**Calls for:**

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

**Feni\_08 – Land adjacent to Beechwood**

**(approx. 37 responses)**

**Main Issues:**

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

**Calls for:**

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

**Otry\_20 – Land to the south east of Bridge Cottages (Employment)**

**(approx. 30 responses)**

**Main Issues:**

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

**Calls for:**

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

---

## **SD19: Development allocation at Hawkchurch**

**Total responses: 8**

### **Hawk\_01 – Norton Store (8 responses)**

#### **Main Issues:**

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

#### **Calls for:**

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

---

## **SD20: Development allocations at Kilmington**

**Total responses: 5**

### **Kilm\_09b – Land east of George Lane (approx. 2 responses)**

#### **Main Issues:**

- Support for allocation with comprehensive layout including Kilm\_09a. (Developer)
- Concerns about reliance on Neighbourhood Plan site and policy clarity. (Developer)

#### **Calls for:**

- Amend policy to include both Kilm\_09a and Kilm\_09b under SD20. (Developer)
- Clarify design principles and affordable housing expectations. (Developer)

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### **Kilm\_10 – Land west and south west of the Old Inn (approx. 3 responses)**

#### **Main Issues:**

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

#### **Calls for:**

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

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## **SD21: Development Allocation at Musbury**

**Total responses: 3**

### **Musb\_01a – Land at Baxter's Farm (3 responses)**

#### **Main Issues:**

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

#### **Calls for:**

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

---

## **SD22: Development allocations at Newton Poppleford**

**Total responses: 3**

### **Newt\_04 – Land to the West of Badger Close**

**(approx. 1 response)**

#### **Main Issues:**

- Site lies within East Devon National Landscape and requires sensitive design. (Individuals)  
Elevated eastern parts are especially sensitive. (Individuals)
- Need for footpath connectivity to Newt\_05 and King Alfred Way. (Devon County Council)

#### **Calls for:**

- Ensure footpath is surfaced and usable in all weather before occupation. (Devon County Council)
- Require masterplan approach for both Newt\_04 and Newt\_05. (Devon County Council)

### **Newt\_05 – Land to the East of Exmouth Road**

**(approx. 2 responses)**

#### **Main Issues:**

- Similar landscape sensitivity as Newt\_04. (Individuals)
- Footpath connection to King Alfred Way is essential. (Devon County Council)

#### **Calls for:**

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

---

## **SD23: Development allocation at Otterton**

**Total responses: 8**

### **Otto\_01 – Land north of Behind Hayes**

**(8 responses)**

#### **Main Issues:**

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

#### **Calls for:**

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

---

## **SD24: Development allocation at Payhembury**

**Total responses: 1**

### **Payh\_03a – Land adjacent to Markers Park**

**(1 response)**

**Main Issues:**

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

**Calls for:**

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

---

**SD25: Development allocation at Plymtree**

**Total responses: 3**

**Plym\_03 – Land north of School**

**(3 responses)**

**Main Issues:**

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

**Calls for:**

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

---

**SD26: Development allocation at Sidbury**

**Total responses: 7**

**Sidm\_34 – Land south of Furzehill**

**(7 responses)**

**Main Issues:**

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

**Calls for:**

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

---

**SD27: Development allocation at Tipton St John**

**Total responses: 1**

**Otry\_04 – Land South of Otter Close**

**(1 response)**

**Main Issues:**

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

**Calls for:**

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

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

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## **SD28: Development allocations at West Hill**

**Total responses: 2**

### **West\_04 – Land adjoining Windmill Lane**

**(1 response)**

#### **Main Issues:**

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

#### **Calls for:**

- None

### **West\_18 – Land north and east of Eastfield**

**(1 response)**

#### **Main Issues:**

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

#### **Calls for:**

- None

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## **Strategic Policy: SD29: Development allocations at Whimble**

**Total responses: 90**

### **Whim\_08a – Land West of Bramley Gardens**

**(approx. 50 responses)**

#### **Main Issues:**

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

#### **Calls for:**

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

### **Whim\_11 – Land at Station Road (Old Cricket Ground)**

**(approx. 50 responses)**

#### **Main Issues:**

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

#### **Calls for:**

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



## **6. Mitigating Climate Change**

**Total responses: 105**

### **CC01 – Climate Emergency**

**Total responses: 19**

#### **Main Issues:**

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

#### **Calls for:**

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

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### **CC02 – Net-Zero Carbon Development**

**Total responses: 33**

#### **Main Issues:**

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

#### **Calls for:**

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

## **CC03 – Promoting Low Carbon and Renewable Energy**

**Total responses: 6**

### **Main Issues:**

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

### **Calls for:**

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

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## **CC04 – Energy Storage**

**Total responses: 2**

### **Main Issues:**

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

### **Calls for:**

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

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## **CC05 – Heat Networks**

**Total responses: 15**

### **Main Issues:**

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

### **Calls for:**

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

## **CC06 – Embodied Carbon**

**Total responses: 23**

### **Main Issues:**

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

### **Calls for:**

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

## **7. Adapting to Climate Change**

**Total responses: 94**

### **AR01: Flooding**

**Total responses: 31**

### **Main Issues:**

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

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

**Calls for:**

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

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## **AR02: Water Efficiency**

**Total responses: 16**

**Main Issues:**

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

**Calls for:**

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

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### **AR03: Coastal Change Management Areas (CCMAs)**

**Total responses: 28**

#### **Main Issues:**

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

#### **Calls for:**

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

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### **AR04: Relocation of Uses Affected by Coastal Change**

**Total responses: 1**

#### **Main Issues:**

- The policy is broadly supported. (Environment Agency)

#### **Calls for:**

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

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## **AR05: Development Affecting Coastal Erosion**

**Total responses: 6**

### **Main Issues:**

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

### **Calls for:**

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

## **8. Meeting Housing Needs**

**Total responses: 192**

### **HN01 – Housing to Address Needs**

**Total responses: 25**

### **Main Issues:**

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

### **Calls for:**

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

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

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## **HN02 – Affordable Housing**

**Total responses: 55**

### **Main Issues:**

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

### **Calls for:**

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

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## **HN03 – Housing for Older People**

**Total responses: 25**

### **Main Issues:**

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

### **Calls for:**

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

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## **HN04 – Accessible and Adaptable Housing**

**Total responses: 22**

### **Main Issues:**

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

**Calls for:**

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

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## **HN05 – Self-Build and Custom Build Housing**

**Total responses: 42**

**Main Issues:**

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

**Calls for:**

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

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## **HN06 – Sub-dividing or Replacing Existing Buildings and Dwellings**

**Total responses: 1**

**Main Issues:**

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

**Calls for:**

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

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

**Total responses: 1**



**Main Issues:**

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

**Calls for:**

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

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**HN08 – Hostels and Houses in Multiple Occupation (HMOs)**

**Total responses: 2**

**Main Issues:**

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

**Calls for:**

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

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**HN09 – Gypsy and Traveller Sites**

**Total responses: 2**

**Main Issues:**

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

**Calls for:**

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

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**HN10 – Rural Housing Exception Sites**

**Total responses: 7**

**Main Issues:**

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

**Calls for:**

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

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**HN11 – Housing for Rural Workers**

**Total responses: 2**

**Main Issues:**

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

**Calls for:**

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

## **9. Supporting the Economy and Town Centres**

**Total responses: 40**

### **SE01 – Employment development within settlement boundaries**

**Total responses: 4**

**Main Issues:**

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

**Calls for:**

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

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### **SE02 – Employment development in the countryside**

**Total responses: 9**

**Main Issues:**

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

**Calls for:**

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

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### **SE03 – Farm diversification**

**Total responses: 3**

**Main Issues:**

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

**Calls for:**

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

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**SE04 – Resisting the loss of employment sites**

**Total responses: 2**

**Main Issues:**

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

**Calls for:**

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

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**SE05 – Employment and Skills Statements**

**Total responses: 5**

**Main Issues:**

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

**Calls for:**

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

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**SE06 – Town centre hierarchy**

**Total responses: 2**

**Main Issues:**

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

**Calls for:**

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

## **SE07 – Town centre development, sequential approach and impact assessment**

**Total responses: 3**

### **Main Issues:**

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

### **Calls for:**

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

## **SE08 – Local shops and services**

**Total responses: 0**

### **Main Issues:**

- No specific issues raised in the document.

### **Calls for:**

- No specific calls for change identified.
- 

## **SE09 – Rural shops outside of towns and villages**

**Total responses: 1**

### **Main Issues:**

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

### **Calls for:**

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

## **SE10 – Sustainable tourism**

**Total responses: 6**

### **Main Issues:**

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

### **Calls for:**

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

## **SE11 – Holiday accommodation parks in designated landscapes**

**Total responses: 4**

### **Main Issues:**

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

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

**Calls for:**

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

## **10. High Quality Design**

**Total responses: 71**

### **DS01 – Design and local distinctiveness**

**Total responses: 26**

**Main Issues:**

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

**Calls for:**

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

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### **DS02 – Housing density and efficient use of land**

**Total responses: 31**

**Main Issues:**

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

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

**Calls for:**

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

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### **DS03 – Display of advertisements**

**Total responses: 1**

**Main Issues:**

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

**Calls for:**

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

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### **DS04 – Green and blue Infrastructure**

**Total responses: 10**

**Main Issues:**

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

**Calls for:**

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

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

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## **11. Sustainable Transport and Communications**

**Total responses: 72**

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

**Total responses: 18**

#### **Main Issues:**

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

#### **Calls for:**

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

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### **TR02 – Protecting transport sites and routes**

**Total responses: 13**

#### **Main Issues:**

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

#### **Calls for:**

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

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### **TR03 – Travel plans, transport statements and transport assessments**

**Total responses: 8**

**Main Issues:**

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

**Calls for:**

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

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## **TR04 – Parking standards**

**Total responses: 16**

**Main Issues:**

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

**Calls for:**

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

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## **TR05 – Aerodrome safeguarded areas and Public Safety Zones**

**Total responses: 1**

**Main Issues:**

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

**Calls for:**

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

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## **TR06 – Digital connectivity**

**Total responses: 6**



**Main Issues:**

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

**Calls for:**

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

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## **TR07 – Wireless connectivity and telecoms infrastructure**

**Total responses: 1**

**Main Issues:**

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

**Calls for:**

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

## **12. Our Outstanding Landscape**

**Total responses: 86**

### **OL01: Landscape Features**

**Total responses: 13**

**Main Issues:**

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

**Calls for:**

- Rewording to allow for balanced judgement of landscape impacts. (Planning Consultants)
  - Inclusion of rivers and waterbodies in the list of valued features. (Environment Agency)
  - Potential for the establishment of sustainable agricultural practices as well as maintaining them (Environment Agency)
  - Recognition of habitat fragmentation risks. (Devon Wildlife Trust)
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## **OL02: National Landscapes (AONBs)**

**Total responses: 9**

### **Main Issues:**

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

### **Calls for:**

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

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## **OL03: Coastal Preservation Areas**

**Total responses: 7**

### **Main Issues:**

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

### **Calls for:**

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

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## **OL04: Areas of Strategic Visual Importance**

**Total responses: 15**

### **Main Issues:**

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

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

**Calls for:**

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

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## **OL05: Green Wedges**

**Total responses: 16**

**Main Issues:**

- Mixed views: some support the principle of Green Wedges, others argue the designations are too extensive and not evidence-based. (Planning Consultants, Parish Councils, Individuals)
- Objections to specific inclusions (e.g. land north of Sowton, Newcourt Barton Business Park) where development is seen as compatible or already established. (Planning Consultants)
- Concerns that the policy may hinder delivery of Biodiversity Net Gain (BNG) or Suitable Alternative Natural Greenspace (SANGS). (Home Builders Federation)
- Loss of reference to climate and flood storage benefits of green wedges and the need to protect them (Environment Agency)
- Objections to the reduction in scale of specific Green Wedges by site allocations (Lymp\_07 and Exmo\_28) (National Trust)

**Calls for:**

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

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## **OL06: Land of Local Amenity Importance and Local Green Space**

**Total responses: 2**

**Main Issues:**

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

**Calls for:**

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

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## **OL07: Contaminated Land**

**Total responses: 1**

### **Main Issues:**

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

### **Calls for:**

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

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## **OL08: Potentially Hazardous Developments and Notifiable Installations**

**Total responses: 0**

### **Main Issues:**

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

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## **OL09: Control of Pollution**

**Total responses: 4**

### **Main Issues:**

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

### **Calls for:**

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

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## **OL10: Development on High Quality Agricultural Land**

**Total responses: 13**

### **Main Issues:**

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

**Calls for:**

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

## **13. Our Outstanding Biodiversity and Geodiversity**

**Total responses: 193**

### **PB01 – Protection of internationally and nationally important wildlife sites**

**Total responses: 6**

**Main Issues:**

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

**Calls for:**

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

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### **PB02: Protection of regionally and locally important wildlife sites**

Total responses: 6

**Main Issues:**

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

**Calls for:**

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

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

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### **PB03 – Protection of irreplaceable habitats and important features**

**Total responses: 15**

#### **Main Issues:**

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

#### **Calls for:**

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

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### **PB04 – Habitats Regulations Assessment**

**Total responses: 13**

#### **Main Issues:**

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

#### **Calls for:**

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

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### **PB05 – Biodiversity Net Gain**

**Total responses: 60**

#### **Main Issues:**

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

#### **Calls for:**

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

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## **PB06 – Local Nature Recovery Strategy and Nature Recovery Network**

**Total responses: 8**

### **Main Issues:**

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

### **Calls for:**

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

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## **PB07 – Ecological enhancement and biodiversity in the built environment**

**Total responses: 24**

### **Main Issues:**

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

### **Calls for:**

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

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## **PB08 – Trees, hedges and woodland on development sites**

**Total responses: 23**

### **Main Issues:**

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

### **Calls for:**

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

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

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## **PB09 – Monitoring requirements for new planting schemes**

**Total responses: 23**

### **Main Issues:**

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

### **Calls for:**

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

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

**Total responses: 2**

### **Main Issues:**

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

### **Calls for:**

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

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## **PB11 – Protection of designated geological sites**

**Total responses: 0**

### **Main Issues:**

- No objections identified in the consultation responses.

### **Calls for:**

- None identified.

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## **PB12 – Regionally Important Geological and Geomorphological Sites**

**Total responses: 0**

### **Main Issues:**

- No objections identified in the consultation responses.

### **Calls for:**

- None identified.

## **14. Open Space and Sports and Recreation**

**Total responses: 54**

### **OS01: Access to open space and recreation facilities**



**Total responses: 12**

**Main Issues:**

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

**Calls for:**

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

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

**Total responses: 21**

**Main Issues:**

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

**Calls for:**

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

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

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

**Total responses: 5**

#### **Main Issues:**

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

#### **Calls for:**

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

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### **OS04: New allotments and avoiding the loss of existing ones**

**Total responses: 3**

#### **Main Issues:**

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

#### **Calls for:**

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

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### **OS05: Leisure and recreation developments in the countryside**

**Total responses: 3**

#### **Main Issues:**

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

#### **Calls for:**

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

## **15. Our Outstanding Historic Environment**

**Total responses: 51**

## **HE01: Historic Environment**

**Total responses: 12**

### **Main Issues:**

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

### **Calls for:**

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

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## **HE02: Listed Buildings**

**Total responses: 14**

### **Main Issues:**

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

### **Calls for:**

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

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## **HE03: Conservation Areas**

**Total responses: 5**

**Main Issues:**

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

**Calls for:**

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

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## **HE04: Archaeology and Scheduled Monuments**

**Total responses: 9**

**Main Issues:**

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

**Calls for:**

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

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## **HE05: Historic Landscapes, Parks and Gardens**

**Total responses: 3**

**Main Issues:**

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

**Calls for:**

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

## **16. Community Facilities**

**Total responses: 17**

### **CF01: New or extended community facilities**

**Total responses: 8**

#### **Main Issues:**

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

#### **Calls for:**

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

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### **CF02: Loss of community facilities**

**Total responses: 7**

#### **Main Issues:**

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

#### **Calls for:**

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

## **17. Implementation and Monitoring**

**Total responses: 11**

### **Main Issues:**

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

### **Calls for:**

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

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

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## Sustainability Appraisal

Total responses: 66

### Main Issues:

- Exmo\_20 was deemed “not suitable or achievable” in the HELAA and should not have been allocated. (Individuals, community groups)
- Contradictions exist between HELAA and SA documents regarding site suitability. (Individuals, planning consultants)
- Lack of consultation and transparency in the allocation process for Exmo\_20. (Individuals, community groups)
- Inconsistent treatment of Exmo\_20 compared to other sites such as Exmo\_04. (Individuals, community groups)
- Exmo\_20 is located within Strategic Nature Area 368 and adjacent to Pebblebed Heaths SPA/SAC, raising biodiversity concerns. (Individuals, community groups)
- The Sustainability Appraisal fails to apply the Mitigation Hierarchy consistently. (Individuals, planning consultants)
- The SA has a limited focus on water quality, sewage capacity, and flood risk. (Environment Agency)
- Exmo\_20 drains into Withycombe Brook, a known flood risk area not assessed in the Strategic Flood Risk Assessment. (Individuals)
- Exmo\_20 is in an unsustainable location, increasing reliance on car travel. (Planning consultants, individuals)
- Use of 1,600m as a walkability metric is misleading and inconsistent with national guidance. (Planning consultants, individuals)
- Exmo\_20's access via the B3179 is unsuitable and unsafe for a large development. (Individuals, planning consultants)
- Lack of realistic walking/cycling infrastructure and public transport links for Exmo\_20. (Individuals, planning consultants)
- The SA and site selection process are not legally compliant or sound under the NPPF. (Planning consultants, individuals, community groups)
- Natural England was not consulted prior to allocation of Exmo\_20, despite its proximity to designated sites. (Individuals, community groups)
- Exmo\_20 was allocated before the Habitat Regulations Assessment was published. (Individuals, community groups)
- The map used to depict Exmo\_20 was inaccurate and included land not available for development. (Individuals)
- Alternative sites identified as “preferred” in the Strategic Planning Committee agenda of 3 September 2024 were not allocated. (Planning consultants, individuals)
- Sustainability Appraisal submitted for Land at Addlepool Farm, Land off Northcote Hill, and Greenhayes. (Planning consultants)

### Calls for:

- Reassess Exmo\_20's allocation based on HELAA findings and legal compliance. (Planning consultants, individuals)



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

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