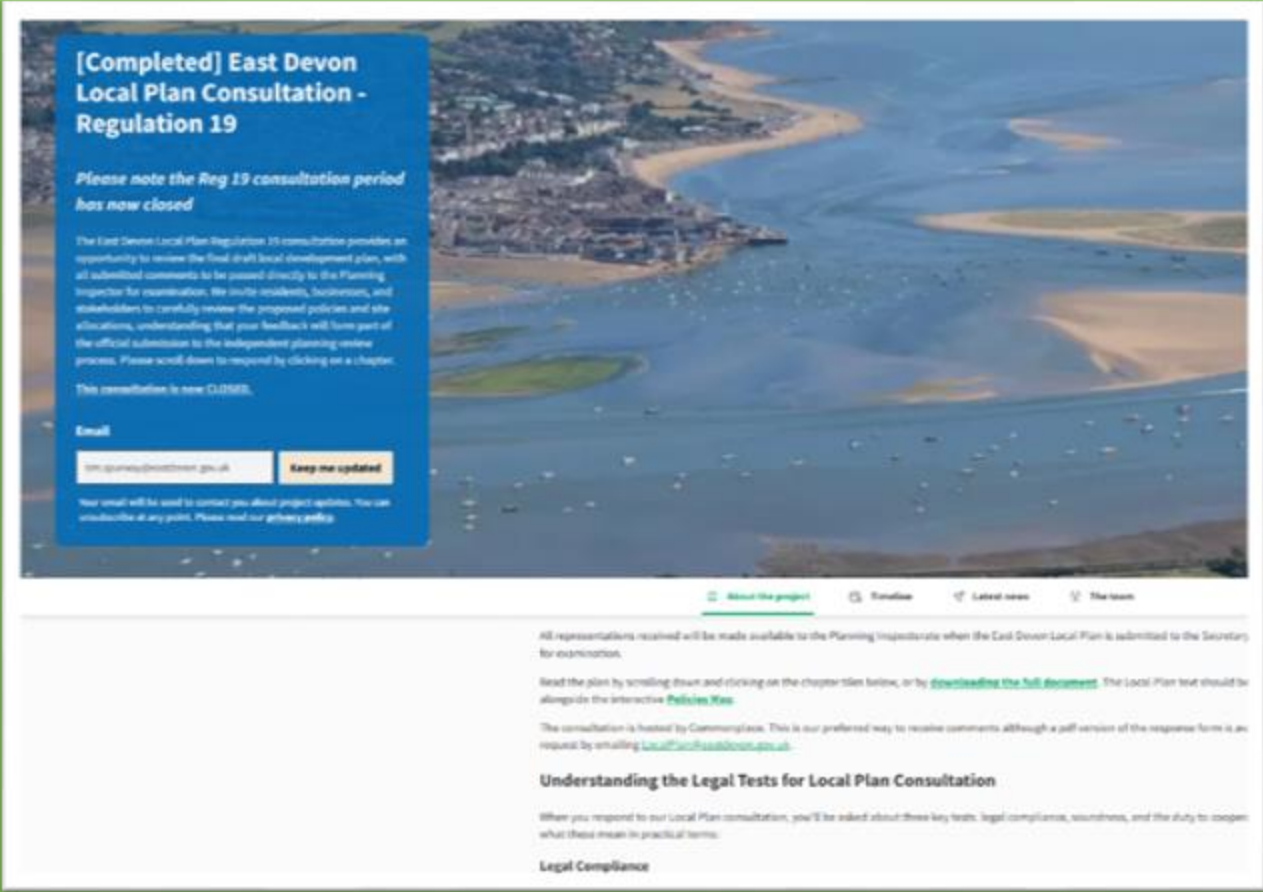


# Draft Feedback Report

## East Devon Local Plan (Regulation 19)

### Consultation (28 Nov 2025 to Monday 26 Jan 2026)



**[Completed] East Devon Local Plan Consultation - Regulation 19**

*Please note the Reg 19 consultation period has now closed*

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

This consultation is now **CLOSED**.

Email

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

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

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

The consultation is hosted by Commuplace. This is our preferred way to receive comments although a pdf version of the response form is available by emailing [LocalPlan@eastdevon.gov.uk](mailto:LocalPlan@eastdevon.gov.uk).

### Understanding the Legal Tests for Local Plan Consultation

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

#### Legal Compliance

## Executive summary

The second Regulation 19 consultation on the East Devon Local Plan ran from Friday 28th November 2025 until Monday 26th January 2026 and invited representations on changes made since the previous publication stage. The consultation generated substantial engagement across strategic policies, settlement strategies, site allocations and development management policies.

Although the consultation was intended to focus on amendments made to the draft plan since the previous Regulation 19 stage, the vast majority of respondents chose to comment on the full content of the Local Plan. This broader approach to representations is therefore reflected throughout this report.

- **Volume and Focus of Responses** – As with the first regulation 19 consultation, the greatest volume of representations related to place-based policies, particularly SD01 (Exmouth), which received over 1,700 responses overall. Within this chapter, individual site allocations attracted particularly high levels of engagement. Issues raised focused primarily on environmental constraints, infrastructure capacity, access, and deliverability.
- **Housing Strategy** - Housing provision remained a key issue across the consultation. SP02 (Levels of future housing development) attracted around 70 responses, with representations focusing on the overall housing requirement, the use of transitional arrangements, the stepped trajectory and reliance on later-stage delivery. Related housing policies, including affordable housing, accessibility and self-build requirements, also generated a significant number of responses.
- **Spatial Strategy and Settlement Hierarchy** - SP01 (Spatial Strategy) received around 45 responses, addressing the distribution of growth between the West End, towns and villages, and the role of individual settlements within the hierarchy. While the overall spatial approach attracted support, concerns were raised regarding the scale of growth in certain locations and the classification of specific settlements.
- **Infrastructure and Viability** - Key issues included water supply and wastewater capacity, transport impacts, health and education provision, and the timing and enforceability of infrastructure delivery. Viability concerns were also raised in relation to affordable housing, climate change policies and biodiversity net gain.
- **Environmental Protection** - Environmental policies generated sustained interest, particularly flooding, biodiversity, habitats and landscape protection. Flood-related policies (AR01 and AR02) received over 20 responses collectively, while PB05 (Biodiversity Net Gain) alone attracted over 30 representations, focused on justification, viability impacts and consistency with national requirements.

- **Sustainability Appraisal and Legal Compliance** - A number of representations raised concerns with the Sustainability Appraisal, including the assessment of reasonable alternatives, consistency with site-selection evidence and the application of mitigation principles.
- **Neighbourhood Plans and Community Engagement** - Some respondents raised concerns regarding the role of neighbourhood plans within the spatial strategy and the clarity and accessibility of consultation materials, with calls for greater transparency in how representations have informed revisions to the plan.
- **Areas of Support** - Support was expressed for the plan’s overall objectives, including its emphasis on sustainable development, climate action and infrastructure-led growth. A number of development management policies received support in principle, particularly those relating to design quality, green infrastructure, heritage and biodiversity protection. Several site allocations were also supported by landowners and developers as deliverable and capable of meeting identified needs.
- **Comments on Changes Made to the Plan** - A smaller but identifiable proportion of representations commented directly on changes made to the draft Local Plan since the previous Regulation 19 consultation. These comments focused mainly on site deletions or modifications, strengthened policy wording, and clarificatory amendments. Several respondents, including statutory bodies such as Historic England, National Highways and Devon County Council, explicitly supported the removal of individual site allocations where this was considered to address earlier concerns. Elsewhere, statutory consultees noted that revised wording—particularly in relation to heritage, archaeology and infrastructure—had resolved or partially addressed previous objections, while a small number of respondents identified improved clarity where additional wording had been introduced.

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## The approach to consultation

The approach to consultation for the second regulation 19 followed an almost identical process to the initial regulation 19 consultation held between Thursday 13th February 2025 and Monday 31st March 2025.

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.

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. The only additional question added was the option to tick whether the comments are related to a change made in the plan from the first regulation 19 consultation to the second regulation 19 consultation.

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 similar to the initial regulation 19 consultation. We received a total of 3,114 responses compared with 3,510 responses in the first, comprising almost 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 and by site. It is noted that the two figures may not add up, as people often commented on multiple sites or topics in a single submission. As in the first regulation 19 consultation 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, again including petitions objecting to its inclusion. These are summarised in the relevant section of this report.

Artificial Intelligence (AI) was utilised widely during the preparation of this report.

- **AI System Used:** Microsoft Copilot.
- **Source Material:** The original response submissions received via commonplace, minus personal information.
- **Scope of AI Use:** To summarise responses and pull out main issues
- **Images and Video:** No images or video of people, property, objects, or places have been created or altered using AI in the preparation of this Local Plan.
- **Date of AI Use:** November 2024.
- **Responsibility and Accuracy:** East Devon District Council retains full responsibility for the factual accuracy of all content. The use of AI has been conducted responsibly and lawfully, in accordance with relevant data protection and copyright legislation. No personal information was processed during the use of AI and all outputs have been thoroughly checked before publication.

A number of site promoters also submitted representations commenting on or 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 these is provided below:

- Lymp\_09 & Lymp\_10a
- Honi\_01 / Honi\_15
- GH/ED/26
- Sidm\_02 / Sidm\_35
- Brcl\_07
- Brhe\_07
- Kilm\_05
- Whim\_12
- Whim\_13

## Response summaries

### 1. Introduction

Total responses: 52

#### Main Issues:

- Some respondents highlight factual inaccuracies or omissions in the introductory text, including incorrect references to neighbourhood plan coverage and missing context on minerals and natural environment (Individuals).
- Several parties express concerns that the plan-making process—particularly the use of a second Regulation 19 consultation—raises questions about transparency, evidence availability and procedural fairness (Planning consultants, Landowners/Developers, Community Groups, Individuals).
- Representations raise significant issues with transitional arrangements, with some arguing that the Council is attempting to rely on lower housing requirements despite substantial changes between Regulation 19 drafts (Planning consultants, Landowners/Developers).
- Multiple respondents consider the Council’s approach to the Duty to Cooperate inadequate, citing insufficient evidence of cross-boundary engagement or unresolved issues such as unmet need (especially for housing), air quality, and strategic site impacts (Individuals; Community Groups; Planning consultants).
- A number of submissions challenge the adequacy, availability or consistency of the supporting evidence base, particularly relating to infrastructure delivery, water quality, viability, and environmental assessments (Planning consultants, Landowners/Developers, Community Groups).
- Some respondents note that key environmental considerations—such as water environment, biodiversity enhancement, and native species requirements—are underrepresented or missing from the introductory material (Public body – Devon Wildlife Trust; Public body – Natural England; Community Groups).
- Concerns are raised about the plan period not covering 15 years and its alignment with national policy, with some arguing that the proposed timescale is unrealistic or inconsistent with NPPF requirements (HBF; Individuals; Planning consultants).
- A number of individuals and community groups express frustration with perceived lack of genuine public engagement, describing consultation processes as one-way or dismissive of public input (Individuals, Community Groups, Parish/Town Councils).
- Several respondents highlight inconsistencies or errors in mapping, including settlement boundary changes and missing designations, which they argue undermine the soundness of the plan (Individuals, Parish/Town Councils, Landowners/Developers).

#### Calls For

- Correct factual errors and improve accuracy of introductory content, ensuring clear and consistent presentation of local context (Individuals).
- Improve transparency regarding transitional arrangements and the rationale for undertaking a second Regulation 19 consultation, including clear explanation of implications for housing requirements (Planning consultants, Landowners/Developers).
- Publish all outstanding evidence base documents and ensure alignment between policy wording, infrastructure requirements and supporting studies (Planning consultants, Landowners/Developers, Community Groups).
- Strengthen references to environmental responsibilities, including biodiversity enhancement, the importance of the water environment, and the role of SuDS and climate adaptation measures (Public body – Devon Wildlife Trust; Public body – Natural England; Community Groups).
- Extend or revisit the plan period to ensure compliance with national policy expectations for long-term strategic planning (HBF; Planning consultants).
- Improve community involvement and demonstrate how public input has shaped plan development, addressing concerns about trust and engagement (Individuals, Community Groups, Parish/Town Councils).
- Review and correct mapping inconsistencies (e.g., settlement boundaries, international and national site designations) to ensure clarity and soundness (Individuals, Parish/Town Councils, Landowners/Developers).

## **2. The Vision**

**Total responses: 26**

### **Main Issues**

- Several respondents consider elements of the vision unrealistic or internally inconsistent, highlighting tensions between growth, environmental protection and the scale/location of proposed development (Individuals, Planning consultants, Landowners/Developers).
- Some representations state that the vision embeds policy conflict by promoting protection of landscape and character while simultaneously proposing significant development in areas constrained by National Landscapes or lacking infrastructure (Planning consultants, Individuals).
- Concerns are raised that the vision does not sufficiently recognise or prioritise meeting housing needs, with multiple parties stating that references to growth are vague or insufficiently aligned with national policy expectations on housing delivery (Landowners/Developers, HBF, Planning consultants).
- A number of respondents consider the vision environmentally unbalanced, either giving undue weight to environmental protection at the expense of housing/economic needs, or failing to acknowledge key environmental responsibilities such as European site

designations and integrated water management (Community Groups – Lypstone Water Quality Group, Individuals).

- Some respondents argue that the vision is undermined by omissions in the supporting diagrams and tables, particularly Figure 3 and Table I, which are said to omit key development numbers or misrepresent settlement tiers (Individuals, Community Groups).
- There are concerns that the vision does not fully reflect the climate and biodiversity emergencies, with requests for clearer commitments to integrated water management, SuDS and biodiversity enhancement (Community Groups – Lypstone Water Quality Group, Community Groups – Otter Valley Association).
- Several individuals raise issues about the impact of large-scale growth (particularly Marlcombe) on infrastructure, landscape and local character, stating that the vision does not realistically address the consequences (Individuals, Community Groups).
- Some respondents request greater clarity on the relative weighting of objectives, particularly regarding National Landscape protection, arguing that references in NPPF require stronger emphasis (Planning consultants – Legal Representatives, Individuals).

#### **Calls For**

- Provide a more realistic, evidence-based and internally consistent vision that clearly reconciles growth, environmental constraints and infrastructure capacity (Planning consultants, Individuals).
- Strengthen references to meeting full housing needs and reflect national policy requirements clearly within the vision (Landowners/Developers, HBF, Planning consultants).
- Adjust the vision to balance environmental protection with deliverability, including clearer recognition of European site designations, biodiversity priorities and integrated water management/SuDS requirements (Public body – Historic England, Community Groups – Lypstone Water Quality Group, Community Groups).
- Update supporting diagrams and tables (e.g., Figure 3, Table I) to include full development numbers for all tiers and ensure accurate, transparent presentation of spatial strategy elements (Individuals, Community Groups).
- Reconsider the wording of objectives to ensure that their relative weight is properly expressed, particularly in relation to National Landscape protection and climate/biodiversity obligations (Planning consultants – Individuals).
- Revisit the framing of growth locations—especially in constrained landscapes—to ensure the vision aligns with realistic infrastructure capacity, landscape protection and the plan’s stated aims (Planning consultants, Individuals, Community Groups).

### **3. Spatial Strategy**

**Total responses: 242**

## **SP01: Spatial strategy**

### **Total responses: 47**

#### **Main Issues**

- There is broad support for focusing strategic growth in the West End, including for extra sites such as land at Addlepool Farm, though several parties seek a more balanced approach that does not under-weight Exmouth's role as Principal Centre (Planning consultants, Landowners/Developers).
- Some representations argue Exmouth's share of growth is too low relative to its size and services, requesting uplift within the spatial hierarchy (Planning consultants, Landowners/Developers).
- Community groups in National Landscape areas (notably Sidmouth) object to references to "significant development," contending that growth should be limited to locally identified needs to conserve landscape character (Community Groups).
- Statutory consultees flag evidence and infrastructure concerns, including deficiencies in the Water Cycle Study affecting the plan's soundness (Public body – Environment Agency) and the need to fully consider impacts on the Strategic Road Network from concentrated West End growth (Public body – National Highways).
- Multiple respondents say Habitats Regulations considerations should underpin **all** strategic policies (not just SP07), highlighting proximity to European sites and constraints around Exmouth and the Pebblebed Heaths (Individuals).
- Developers/landowners and their planning consultants generally support the overall distribution but call for clearer articulation of the housing pipeline and flexibility/contingency if the new community is delayed (Planning consultants, Landowners/Developers).
- Move significant levels of housing away from National Landscapes and into the West End to meet Exeter's unmet needs (Planning consultants, Landowners/Developers).
- Support the spatial strategy for significant development at Honiton, but the level of actual provision is too low, and should include site at Heathfield Manor (Planning consultants, Landowners/Developers).
- The HBF considers the strategy unsound without additional allocations and clearer distribution/delivery detail, and questions reliance on transitional arrangements (HBF).
- Several representations say certain sustainable villages (e.g., Kilmington, Woodbury, Whimple) are under-scored in the hierarchy and should have an elevated role given services and connectivity (Planning consultants, Landowners/Developers).
- Potential for Marlcombe to have long term effects on the operation of the Devon County Showground (Devon County Agricultural Association).
- Minor drafting and evidence points are raised, including correcting erroneous evidence library references within SP01's footnotes (Planning consultants, Landowners/Developers).

### **Calls For**

- Retain and/or increase the West End focus but give Exmouth greater weighting and/or enable earlier delivery on allocations capable of front-loading supply (Planning consultants, Landowners/Developers).
- Elevate the role of the most sustainable villages (e.g., review the designation of Whimple) so the hierarchy and distribution reflect services, connectivity and growth potential (Planning consultants, Landowners/Developers).
- Embed explicit Habitats Regulations/European site tests across **all** strategic policies and align allocations accordingly, particularly near the Pebblebed Heaths (Individuals; Public body – Environment Agency).
- Ensure SRN impacts and mitigation are fully evidenced for West End growth and new settlement proposals (Public body – National Highways).
- Provide clearer policy wording on distribution and a transparent housing delivery pipeline, with contingency if the new settlement slips, including identification of additional or reserve sites (HBF; Planning consultants, Landowners/Developers).
- Re-balance growth away from National Landscapes and towards less constrained areas, protecting landscape character and focusing on brownfield/intensification where appropriate (Landowners/Developers, Community Groups).
- Correct evidence references (e.g., footnote document IDs) and provide clearer audit trails for SA/site-selection changes referenced in the justification (Planning consultants, Individuals).

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

### **Total responses: 72**

#### **Main Issues**

- A number of individual respondents object to the overall scale of development proposed, citing impacts on character, landscape and infrastructure capacity (Individuals).
- Many respondents argue the proposed housing requirement is unjustified and too low, noting reliance on transitional arrangements results in delivering only around 80% of objectively assessed need (Planning consultants, Landowners/Developers, HBF, Individuals).
- Concerns are raised about the stepped trajectory, seen as deferring housing delivery to later years, worsening unmet need and risking plan effectiveness (Planning consultants, Landowners/Developers, Community Groups).
- Some respondents argue that the scale of employment land provision elsewhere in the Plan is not supported by sufficient housing delivery to provide an adequate labour supply, potentially undermining economic strategy objectives (Planning consultants, Landowners/Developers).

- Some bodies emphasise the need to accommodate unmet need from neighbouring authorities, notably Torbay, which cannot meet its own Local Housing Need (Public body – Torbay Council).
- Respondents say reliance on the new community (Marlcombe) for later delivery is risky due to uncertainties around timing, infrastructure and viability (Planning consultants, Individuals, Community Groups).
- Questions are raised about whether the plan period meets the minimum 15-year requirement from adoption, with suggestions the period may need extending (Planning consultants).

#### **Calls For**

- Increase the housing requirement to fully reflect local housing need and avoid under-provision (Planning consultants, Landowners/Developers, HBF).
- Remove the stepped trajectory and adopt a consistent annual requirement across the plan period (Planning consultants, Landowners/Developers).
- Ensure alignment between economic growth forecasts and housing numbers, adjusting one or both if needed (Planning consultants, Landowners/Developers).
- Address unmet need from Torbay and ensure robust cross-boundary dialogue (Public body – Torbay Council).
- Extend the plan period to ensure it covers a full 15 years post-adoption (Planning consultants).
- Increase allocations and early-years delivery to reduce over-reliance on Marlcombe (Planning consultants).

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

#### **Total responses: 15**

#### **Main Issues**

- Discrepancies are reported between DNA housing requirements and allocations (e.g. Honiton numbers not matching distribution in SD policies) (Planning consultants, Landowners/Developers).
- Some respondents say figures for certain areas such as Lypstone and Ottery St Mary represent unrealistic increases relative to existing scale and infrastructure (Individuals, Parish/Town Councils, Community Groups).
- Concerns raised that reliance on Neighbourhood Plans for delivery is risky because neighbourhood planning is voluntary and uncertain (HBF, Planning consultants).
- Several representations question evidence and consistency around calculations, including treatment of completions since 2020 and relationship to settlement hierarchy (Individuals, Planning consultants).
- Some stakeholders argue more growth should be directed to sustainable settlements such as Woodbury and Axminster (Landowners/Developers, Planning consultants).

### **Calls For**

- Clarify the relationship between DNA requirements, SD-policy allocations, and existing commitments (Planning consultants, Landowners/Developers).
- Review housing numbers for areas showing disproportionate increases (Individuals, Parish/Town Councils, Community Groups).
- Reduce reliance on Neighbourhood Plans by allocating sufficient sites in the Local Plan itself (HBF, Planning consultants).
- Provide transparent calculations including completions since 2020 (Individuals).
- Allocate additional sites in sustainable rural centres (Planning consultants, Landowners/Developers).

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

### **Total responses: 11**

#### **Main Issues**

- Objections to allocations within National Landscape areas and calls to redirect employment growth to the West End where demand is strongest (Planning consultants, Landowners/Developers, Community Groups).
- Several state employment land provision is either excessive, unrealistic in timescale (e.g. Marlcombe employment), or insufficiently flexible to meet market needs (Planning consultants, Landowners/Developers).
- Concerns raised about reliance on distributing E(g)(iii) uses within mixed-use housing allocations without evidence they suit operational requirements (Planning consultants).
- Some respondents support allocations but seek a wider range of employment uses beyond B2/B8 and E(g) to reflect modern economic sectors (Landowners/Developers, Planning consultants).
- National Highways highlights significant SRN impacts arising from West End employment growth (Public body – National Highways).

#### **Calls For**

- Remove or reduce allocations in National Landscapes and redirect land to West End locations such as Hill Barton and Sowton village (Planning consultants, Landowners/Developers).
- Increase flexibility within the policy to allow a wider range of employment uses beyond traditional classes (Planning consultants, Landowners/Developers).
- Provide evidence of deliverability for allocations linked to new settlements (Planning consultants).
- Align distribution of jobs and homes to reduce labour-supply shortages (Planning consultants).
- Ensure SRN capacity impacts are properly assessed and mitigation secured (Public body – National Highways).

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

**Total responses: 7**

### **Main Issues**

- Objections to boundary changes at Bystock Village in Exmouth, citing factual inaccuracies, conflict with ENP heritage policies, and lack of evidence (Individuals; Community Groups; Parish/Town Councils).
- Multiple representations argue the settlement boundary methodology has been misapplied, especially criteria B2/B3 (Individuals; Planning consultants).
- Concerns that SP05 restricts Neighbourhood Plans from allocating sites beyond boundaries, conflicting with national policy ("general conformity" tests) (Planning consultants; Landowners/Developers).
- Concerns about potential coalescence of Seaton and Colyford and excessive development pressure (Individuals; Parish/Town Councils).
- Some seek removal of unnecessary wording in SP05 that duplicates already-required policy considerations (Landowners/Developers).

### **Calls For**

- Reverse/amend boundary changes lacking robust evidence, especially Bystock Village (Individuals; Parish/Town Councils; Community Groups).
- Correct errors in applying settlement boundary criteria and ensure consistency with Neighbourhood Plan protections (Individuals; Community Groups).
- Revise policy text to allow Neighbourhood Plans to allocate land outside boundaries where justified (Planning consultants; Landowners/Developers).
- Remove unnecessary explanatory text duplicating statutory requirements (Landowners/Developers).

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## **SP06: Development beyond Settlement Boundaries**

**Total responses: 7**

### **Main Issues**

- Many say the policy is excessively restrictive and prevents sustainable sites (especially employment opportunities) from progressing despite being adjacent to existing allocations (Planning consultants; Landowners/Developers).
- Tension identified between SP05 and SP06 around whether Neighbourhood Plans can expand settlement boundaries (Planning consultants).
- Policy does not sufficiently acknowledge exceptions in the NPPF for rural employment, rural exception housing, and isolated homes (Planning consultants; Landowners/Developers).
- Individuals argue the blanket restriction could harm rural economies (Individuals).

### **Calls For**

- Add flexibility allowing sustainably located employment/housing proposals just outside boundaries (Planning consultants; Landowners/Developers).
- Clarify interaction between SP05, SP06 and NPPF rural exceptions (Planning consultants).
- Avoid rigid restrictions that inhibit rural economic activity (Individuals; Landowners/Developers).

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## **SP07: Delivery of infrastructure**

**Total responses: 35**

### **Main Issues**

- Major concerns over insufficient water/wastewater capacity evidence, especially for Honiton, Feniton, Otter Valley and Marlcombe (Public body – Environment Agency; Community Groups; Individuals).
- Calls for Habitats Regulations screening and European site protection to be consistently applied across all strategic policies, not only SP07 (Individuals; Community Groups).
- Requests for clearer viability flexibility where infrastructure obligations threaten deliverability (Planning consultants; Landowners/Developers).
- NHS Devon ICB states primary care infrastructure needs are not properly reflected in the IDP or allocations (Public body – NHS Devon ICB).
- National Highways requests earlier clarity on strategic transport impacts, including SRN interventions (Public body – National Highways).

### **Calls For**

- Provide fuller water/wastewater evidence and ensure development phasing aligns with existing network capacity (Public body – Environment Agency; Community Groups).
- Embed Habitats Regulations considerations into all SP policies (Individuals; Community Groups).
- Introduce viability-based flexibility where needed (Planning consultants; Landowners/Developers).
- Strengthen enforceability of health infrastructure requirements and formally identify NHS Devon ICB as a delivery partner (Public body – NHS Devon ICB).
- Update IDP and strategic highway evidence to properly reflect plan-wide needs (Public body – National Highways).

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

**Total responses: 11**

### **Main Issues**

- Some support the intent but say the wording is unclear or overly prescriptive, especially regarding which services must reach parcel boundaries (Landowners/Developers; Planning consultants).
- Environment Agency states the Water Cycle Study is not robust enough to justify phased development assumptions (Public body – Environment Agency).
- Community groups raise concerns about wastewater capacity, especially for the Otter Valley, arguing upgrades are needed before additional homes (Community Groups).
- NHS Devon ICB says health infrastructure obligations are insufficiently defined (Public body – NHS Devon ICB).
- Devon County Council supports stronger active-travel and internal parcel-to-parcel transport requirements (Public body – Devon County Council).

#### **Calls For**

- Streamline and clarify policy wording, especially around single/multiple developers and service installation requirements (Landowners/Developers).
  - Specify which infrastructure elements must be extended to parcel boundaries (Planning consultants; Landowners/Developers).
  - Strengthen wastewater/water infrastructure requirements and align delivery with available capacity (Public body – Environment Agency; Community Groups).
  - Include explicit health infrastructure phasing obligations (Public body – NHS Devon ICB).
  - Ensure robust and continuous active-travel and transport connectivity between parcels (Public body – Devon County Council).
- 

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

**Total responses: 116**

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

**Total responses: 55**

#### **Main Issues**

- Many respondents consider the delivery trajectory unrealistic, with insufficient evidence that c.3,300 homes can be delivered by 2042 given landownership complexity, infrastructure requirements and lead-in times (Planning consultants; Landowners/Developers; HBF).
  - Concerns raised about over-reliance on Marlcombe to meet housing needs, creating risk if delivery falls behind and reducing resilience in the overall spatial strategy (Planning consultants; Landowners/Developers; HBF).
  - Infrastructure evidence is viewed as incomplete, particularly on water supply, wastewater treatment, primary care, emergency services, and the scale and feasibility
-

- of education provision (Public body – Environment Agency; Public body – NHS Devon ICB, Devon and Cornwall Police, Devon and Somerset Fire and Rescue Service).
- Concern over the level of detail currently available for identified transport infrastructure, and the funding and delivery strategy for necessary strategic road network (SRN) improvements (Public body – National Highways, Network Rail).
- The masterplan is seen as unclear in places and lacking detail on responsibilities, flexibility and phasing, with concern it may not be robust enough to guide such a large-scale allocation (Planning consultants; Landowners/Developers).
- Proposed densities (45dph site-wide and up to 75dph in the town centre) are viewed as potentially unrealistic given topography, viability and placemaking objectives (Planning consultants; Landowners/Developers).
- Natural England and others raise concerns about SANG corridors, noise-affected locations near the A30/airport and the unsuitability of Cats Copse for SANG designation (Public body – Natural England).
- Clarity is requested on the affordable housing expectations, with concerns that a 40% aspiration may be unviable (Planning consultants; Landowners/Developers).
- The additional land required to form part of the proposed new community to deliver at least 10,000 dwellings should be considered to ensure a comprehensive and coordinated approach to placemaking is undertaken. Land suggested includes to the east of the proposed new community and comprising c.64 hectares which has potential to deliver 1,000-1,500 new homes alongside suitable supporting infrastructure and at Bishop's Court Lane. (Planning consultants; Landowners/Developers).
- Lacks clarity on key specific details that could have a significant impact on the long term future of Devon County Showground (Devon County Agricultural Association).

#### **Calls For**

- Reduce reliance on Marlcombe by allocating additional early-delivery sites to strengthen housing supply resilience (Planning consultants; HBF).
- Strengthen evidence on water, wastewater, primary care, utilities and education to support the level of development proposed (Public body – Environment Agency; Public body – NHS Devon ICB).
- Provide clearer and more flexible masterplanning requirements, including roles, processes, engagement and scope for changes during future masterplanning stages (Planning consultants; Landowners/Developers).
- Transport evidence for the SRN and define realistic phasing for required interventions (Public body – National Highways).
- Review density expectations to ensure they reflect site conditions, viability and character (Planning consultants; Landowners/Developers).
- Refine SANG requirements, ensuring adequate corridor widths, noise mitigation and removal of sensitive habitats such as Cats Copse from SANG designation (Public body – Natural England).

- Clarify affordable housing expectations by identifying a viable baseline supported by evidenced viability work (Planning consultants; Landowners/Developers).

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

**Total responses: 1**

### **Main Issues:**

- Objection that the proposed substation location is too close to existing Farringdon properties. (Individual)

### **Calls For:**

- Identify an alternative substation location further away from residential dwellings. (Individual)

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## **WS03: Exeter Science Park**

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 1**

### **Main Issues:**

- No objections raised; one respondent expresses clear support. (Individual)

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

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 2**

### **Main Issues:**

- Environment Agency states SFRA findings should be required (“must/shall”), not optional (“should”). (Environment Agency)
- Landowner supports allocation but says some uses and wording are too restrictive, and the masterplan requirement may delay delivery. (Developers/Planning Consultants)
- Landowner seeks inclusion of additional adjacent land to expand employment provision. (Developers/Planning Consultants)

### **Calls For:**

- Strengthen SFRA wording to “must/shall”. (Environment Agency)
- Add flexibility to employment use classes (including sui generis) and simplify ancillary-use wording. (Developers/Planning Consultants)
- Allow masterplanning to be proportionate and not block phased delivery; permit allocation boundary expansion. (Developers/Planning Consultants)

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

**Total responses: 2**

**Main Issues:**

- Environment Agency wants SFRA wording strengthened (“must/shall”). (Environment Agency)
- Historic England welcomes new wording requiring heritage impact assessment and design mitigation. (Historic England)

**Calls For:**

- Replace “should” with stronger SFRA compliance wording. (Environment Agency)
- Retain strengthened heritage wording. (Historic England)

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

**Total responses: 3**

**Main Issues:**

- Environment Agency requests mandatory (“must/shall”) use of SFRA evidence. (Environment Agency)
- Adjacent landowner wants boundary expanded to include an additional 0.8ha parcel with no known constraints. (Developers/Planning Consultants)

**Calls For:**

- Strengthen SFRA wording. (Environment Agency)
- Extend WS08 boundary to include adjoining developable land. (Developers/Planning Consultants)

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

**Total responses: 18**

**Main Issues:**

- Multiple landowners object to CVRP boundary being extended onto their land without clear justification or consultation. (Developers/Planning Consultants; Landowners)
- Calls for clarity that CVRP does not prevent development, referencing adopted Local Plan wording. (Developers/Planning Consultants)

- Objections to CVRP covering parts of the Devon County Showground, citing lack of evidence. (Devon County Agricultural Association)
- Natural England supports the policy but asks for clarity on SANG wording. (Natural England)
- Some promoters support CVRP in principle but seek boundary changes allowing complementary development. (Landowners/Promoters)

**Calls For:**

- Remove or amend CVRP boundaries where drawn without evidence or where they overlap operational land. (Landowners; Devon County Agricultural Association))
- Add clarity on SANG being required only when mitigating European-site impacts. (Natural England)
- Reinsert adopted Local Plan wording confirming CVRP is not a “policy boundary” preventing development. (Developers/Planning Consultants)
- Correct minor wording errors. (Devon Wildlife Trust)

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

**Total responses: 18**

**Main Issues:**

- Numerous objections citing flood risk, ecological sensitivity, proximity to Clyst Marshes CWS, and climate-change flood projections. (Residents; Community Groups; Planning Consultants)
- Traffic constraints: Clyst Road narrow, often flooded; junctions already congested. (Residents/Community Groups)
- Cross-boundary concerns: requires coordination with Exeter City Council; insufficient evidence of joint work. (Planning Consultants; Residents)
- Network Rail requests inclusion of rail capacity enhancements wording. (Network Rail)
- National Highways emphasises need for cumulative impact assessment and early mitigation identification. (National Highways)
- Some landowners support allocation but want greater flexibility for early phases. (Developers/Planning Consultants)

**Calls For:**

- Remove or reduce WS10; exclude land east of Clyst Road. (Residents/Community Groups)
- Require explicit links to Newcourt Road and rail-capacity upgrades. (Network Rail; Planning Consultants)
- Strengthen infrastructure evidence before adoption, including M5 J30 mitigation. (National Highways)
- Allow phased releases where they do not prejudice wider masterplanning. (Developers/Planning Consultants)

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

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 2**

**Main Issues:**

- Historic England objects to the use of the term “Scheduled Ancient Monument” and requests correction. (Historic England)
- National Highways says cumulative transport impacts are not fully evidenced. (National Highways)

**Calls For:**

- Replace “Ancient” with “Scheduled Monument.” (Historic England)
- Include clearer contributions strategy for strategic road network mitigation. (National Highways)

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

**Total responses: 3**

**Main Issues:**

- Devon Wildlife Trust seeks habitat buffering for grazing marsh priority habitat. (Devon Wildlife Trust)
- National Highways raises similar concerns about cumulative transport evidence as WS12/14/15. (National Highways)

**Calls For:**

- Add requirement for sufficient ecological buffers to protect grazing marsh habitat. (Devon Wildlife Trust)
- Provide clearer strategic transport-mitigation framework. (National Highways)

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

**Total responses: 1**

**Main Issues:**

- National Highways repeats concerns that policy lacks clear strategic mitigation for cumulative transport impacts. (National Highways)

**Calls For:**

- Add reference to strategic transport-mitigation contributions. (National Highways)

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## **WS15 – Darts Farm**

**Total responses: 3**

### **Main Issues:**

- National Highways says cumulative transport effects from intensification are not fully evidenced. (National Highways)
- One respondent says policy lacks a spatially defined landscape framework to protect the Clyst Valley from incremental intensification. (Resident/Community Stakeholder)

### **Calls For:**

- Introduce explicit landscape/green-infrastructure framework for the West End. (Resident/Community Stakeholder)
- Include strategic transport-mitigation requirements. (National Highways)

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

**Total responses: 2033**

### **SD01 - Exmouth and its development allocations**

**Total responses: 1774**

#### **Exmo\_23 – Land to the South of Courtlands Lane**

**Total responses: 2**

### **Main Issues:**

- Development needs to ensure it is planned in coordination with the adjacent Lymp\_07 allocation (Public Body – Devon County Council).
- Highlights the need for a coherent access strategy covering both Exmo\_23 and Lymp\_07, including safe pedestrian, cycle and vehicle movement through the area (Public Body – Devon County Council).
- Landscape and heritage sensitivity is noted, with built development needing careful design due to nearby heritage assets (Public Body – Devon County Council).
- The importance of retaining the East Devon Way footpath through the wider area is emphasised (Public Body – Devon County Council).

### **Calls For:**

- Combine Exmo\_23 and Lymp\_07 into a single coordinated policy section to ensure unified planning, access and layout (Public Body – Devon County Council).
- Provide a coordinated access strategy that addresses sustainable transport, including active travel links, off-street pedestrian/cycle routes and connections to adjacent areas such as Lympstone Manor (Public Body – Devon County Council).

- Ensure design is sensitive to heritage and landscape constraints, particularly where development affects nearby heritage assets (Public Body – Devon County Council).
- Retain and enhance the East Devon Way footpath within a generous green corridor (Public Body – Devon County Council).

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### **Lymp\_07 – Land at Courtlands Cross**

**Total responses: 3**

#### **Main Issues:**

- Respondents emphasise the need for coordinated planning with Exmo\_23 to ensure a unified approach to access, layout and infrastructure (Public Body – Devon County Council).
- Argue that Lymp\_07 remains a suitable and deliverable site that can offer benefits including housing, employment land, sports pitches and improved pedestrian routes (Planning Consultants).
- Concerns are raised by some individuals about cumulative impacts when combined with neighbouring allocations, particularly around traffic, active-travel provision and local infrastructure capacity (Individuals).
- The East Devon Way footpath is highlighted as a key feature requiring protection and sensitive integration within the design (Public Body – Devon County Council).

#### **Calls For:**

- Combine Lymp\_07 with Exmo\_23 in a single coordinated policy section, supported by a unified access strategy (Public Body – Devon County Council).
- Deliver enhanced pedestrian and cycle connections through the site, including safe east–west and north–south routes and links to Lympstone Manor and adjoining areas (Public Body – Devon County Council).
- Retain and enhance the East Devon Way in a generous green corridor (Public Body – Devon County Council).
- Progress the allocation as proposed, recognising its potential to deliver housing, employment land and sports facilities where constraints are addressed (Planning Consultants).

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### **Exmo\_47 – Land west of Hulham Road**

**Total responses: 0**

- No responses were received for this site.

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### **Lymp\_14 - Coles Field**

**Total responses: 4**

#### **Main Issues:**

- Some respondents object to development because Lymp\_14 provides the main access route to Exmo\_04, raising concerns about traffic, safety and impacts on narrow rural roads (Individuals).
- Ecological sensitivities are highlighted, with comments noting biodiversity interest on and near the site and the risk of habitat fragmentation if both Lymp\_14 and Exmo\_04 proceed (Individuals).
- Respondents argue that development would increase vehicle movements along Hulham Road, which already has limited pedestrian provision and would require improvements to support safe walking and cycling (Individuals, Public Body – Devon County Council).
- Devon County Council identifies the need for strong active-travel connections linking Lymp\_14 to Exmo\_04a and Goodmores Farm (Public Body – Devon County Council).
- No site-promoter objections were submitted specifically regarding Lymp\_14.

**Calls For:**

- Remove Lymp\_14 from the Local Plan due to ecological sensitivity, access concerns and its role as the only route to Exmo\_04 (Individuals).
- Ensure any allocation requires safe pedestrian and cycle connections to Exmo\_04a, Goodmores Farm and the wider network (Public Body – Devon County Council).
- Require development to protect biodiversity features and avoid harm to adjoining priority habitats (Public Body – Devon County Council).
- Provide localised improvements to support sustainable travel modes if the site is retained (Public Body – Devon County Council).

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**Exmo\_04a – Marley Drive**

**Total responses: 22**

**Main Issues:**

- Many respondents object because the site contains important habitats including Wood-Pasture Priority Habitat, ancient/veteran trees and red-list species, which they believe make it unsuitable for development (Individuals, Community Groups).
- The land is viewed as an important wildlife corridor between ancient woodland blocks, and development is seen as causing irreversible ecological fragmentation (Individuals).
- Concerns are raised about an underground watercourse and the site's role in managing run-off from Woodbury Common, with fears that development would increase flooding in Exmouth (Individuals).
- Access from Higher Marley Road is considered unsafe due to narrow roads, additional traffic and proximity to the Pebblebed Heaths (Individuals, Community Groups).
- Some respondents highlight the site's historic parkland character and mature Luccombe oaks as important landscape features that should be retained (Individuals).

- Developers argue the site can accommodate a higher number of homes than proposed and that technical constraints can be addressed (Developers/Landowners).
- Devon County Council notes the need for pedestrian/cycle links to Lymp\_14 and Goodmores Farm (Public Body – Devon County Council).

**Calls For:**

- Remove the site from the Local Plan due to habitat sensitivity, biodiversity value and flood risk (Individuals, Community Groups).
- Protect ancient/veteran trees, priority habitats and the parkland landscape by preventing development (Individuals).
- Avoid altering or diverting the underground stream to prevent downstream flooding (Individuals).
- If allocated, require strong pedestrian/cycle connectivity with Lymp\_14 and Goodmores Farm (Public Body – Devon County Council).
- Increase the housing capacity to around 130 dwellings to reflect evidence from the planning application, if the site is retained (Developers/Landowners).

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**Exmo\_20 – Land at St John’s**

**Total responses: 1672**

**Main Issues:**

- The site is considered unsuitable due to its immediate proximity to the Pebblebed Heaths SAC/SPA/SSSI, with significant concerns that development would lead to ecological harm through recreation pressure, cat predation, nitrogen deposition, habitat loss and disturbance to protected species including nightjar (Individuals, Community Groups, Devon Wildlife Trust, RSPB, Public Body – Natural England).
- Many respondents believe the allocation conflicts with the Habitats Regulations and lacks a viable mitigation strategy, with the HRA indicating uncertainty in ruling out adverse effects on integrity (Individuals, Community Groups, Devon Wildlife Trust, RSPB).
- The site lies within a Strategic Nature Area and contains priority habitats, ancient woodland, veteran trees and unconfirmed wildlife sites, which respondents consider highly sensitive and unsuitable for development (Individuals, Community Groups, Devon Wildlife Trust).
- Access via the B3179 is considered unviable due to required major highway works, increased congestion, air-quality impacts on the heathland and risks associated with narrow rural roads (Individuals, Planning Consultants, Community Groups).
- The distance from services and the isolated location are viewed as leading to car-dependent development contrary to sustainable transport policies and the intentions of TR01 (Individuals, Planning Consultants, Community Groups).

- Respondents raise concerns that increased surface water run-off from this elevated greenfield site will exacerbate flood risks associated with Withycombe Brook and local drainage infrastructure (Individuals, Community Groups).
- Many believe the scale of development would cause considerable heritage harm to the Grade II\* Church of St John in the Wilderness and its tranquil rural setting (Individuals, Public Body – Historic England, Community Groups).
- A large number of representations argue the allocation is unsound due to conflicts with numerous NPPF policies relating to biodiversity, heritage, transport, landscape, plan-making and climate resilience (Individuals, Community Groups, Planning Consultants).
- Some respondents highlight uncertainties around the Mineral Safeguarding Area affecting site capacity, deliverability and the need for prior extraction (Public Body – Devon County Council, Planning Consultants).
- Concerns are raised about infrastructure capacity, including impacts on water supply, sewage systems, GP surgeries, schools and local roads, which communities feel are already overstretched (Individuals, Community Groups).
- Several respondents believe the selection process for the site was flawed, including claims the Site Selection Methodology was altered and that alternative, less sensitive sites exist (Individuals, Planning Consultants, Community Groups).
- Some objections emphasise the loss of agricultural land and the site's important buffer role between Exmouth and the protected heathlands (Individuals, Devon Wildlife Trust, Community Groups).
- Some developer interests maintain the site is deliverable but request increased flexibility around minerals, heritage buffers, and tree/hedgerow retention (Developers/Landowners, Planning Consultants).

**Calls For:**

- Remove Exmo\_20 from the Local Plan entirely due to environmental, heritage, access, sustainability and legal compliance concerns (Individuals, Community Groups, Devon Wildlife Trust, RSPB).
- Exclude at least the 400m zone adjacent to the Pebblebed Heaths to protect European site integrity and reduce cat predation risk (Individuals, RSPB, Devon Wildlife Trust, Public Body – Natural England).
- Reduce the overall scale of development or restrict built development to the southern part of the site away from the church and designated habitats (Individuals, Community Groups, Public Body – Historic England).
- Provide an alternative access solution avoiding the B3179, or reconsider access via Exmo\_18 or other southern routes (Individuals, Public Body – Historic England, Community Groups).

- Undertake further detailed heritage, archaeological and ecological assessments before considering the site deliverable (Public Body – Devon County Council, Historic England).
- Reassess the mineral safeguarding implications and adjust policy wording to require clearer tests for prior extraction and flexibility where extraction is not viable (Public Body – Devon County Council, Planning Consultants).
- Move the settlement boundary further from the protected heathland and provide a natural buffer with native planting (Individuals, Public Body – Natural England).
- Consider alternative smaller sites in Exmouth or elsewhere that are closer to services and do not risk significant environmental harm (Planning Consultants, Individuals, Community Groups).

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### **Exmo\_18 - Land directly to the East of Liverton Business Park**

**Total responses: 3**

#### **Main Issues:**

- Developers consider the requirement to keep development in the southern third below an undefined “ridgeline” unclear, unjustified and inconsistent with committee discussions (Developers/Landowners, Planning Consultants).
- They argue that fixed height or design restrictions could undermine the viability of employment uses (Developers/Landowners).
- Respondents note that landscape impacts should be considered alongside neighbouring allocations, including Exmo\_17 opposite (Developers/Landowners).
- Some feel the policy pre-emptively sets design constraints that should be addressed through detailed masterplanning (Developers/Landowners).
- Devon County Council highlights the need for active-travel and bus improvements if a secondary access from Salterton Road is pursued (Public Body – Devon County Council).

#### **Calls For:**

- Remove or revise the “ridgeline” restriction and allow height and layout to be determined at planning application stage (Developers/Landowners, Planning Consultants).
- Retain but clarify the option for secondary access from Salterton Road (Developers/Landowners).
- Include requirements for extended shared-use paths, improved bus stops and coordination with Exmo\_17 if secondary access is used (Public Body – Devon County Council).
- Maintain flexibility in design and layout to support deliverability (Developers/Landowners).

- Reinforce southern/eastern hedgerows and provide additional planting to soften landscape impacts (Developers/Landowners, Public Body – Devon County Council).

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## **Exmo\_17 – Land to the South of Littleham**

**Total responses: 72**

### **Main Issues:**

- Development is considered inappropriate due to the site's location within the East Devon National Landscape, where respondents emphasise harm to landscape character, tranquillity and long-distance views (Individuals, Community Groups).
- Heritage concerns focus on potential adverse effects on the Grade II\* Littleham Church and the setting of multiple heritage features recorded across the site (Individuals).
- Respondents highlight the site's role as a wildlife corridor and the presence of species-rich habitats, mature trees and priority ecological features that they believe would be permanently lost (Individuals, Community Groups).
- Safety concerns are raised about a proposed access crossing of the Exmouth–Budleigh cycle/walking route, which is valued as a safe green corridor (Individuals).
- Flood risk concerns relate to surface run-off towards Littleham Brook and existing drainage pressures in the area (Individuals).
- The site is considered remote from services, with limited bus provision and no safe walking/cycling access to schools or shops, leading to car dependency (Individuals, Community Groups).
- Some respondents argue that reasons used to reject other National Landscape sites should also apply here, indicating inconsistency in site selection (Individuals).
- Developer representations support allocation but request emphasis on landscape-led design and improvements to cycle/pedestrian links (Developers/Landowners).
- Devon County Council notes archaeological potential and recommends clarity on required pedestrian/cycle connections (Public Body – Devon County Council).

### **Calls For:**

- Remove Exmo\_17 from the Local Plan due to landscape status, heritage sensitivity and policy conflicts (Individuals, Community Groups).
- Avoid vehicular access across the Exmouth–Budleigh cycle route to maintain safety and amenity (Individuals, Community Groups).
- Undertake more detailed heritage and archaeological assessments before determining the site's suitability (Public Body – Devon County Council, Individuals).
- Protect wildlife corridors, habitats, trees and hedgerows, with some suggesting the land is more suitable for nature recovery than development (Individuals, Community Groups).
- Reassess alternative sites outside the National Landscape and closer to services, or prioritise brownfield land (Individuals, Community Groups).

- Clarify and strengthen requirements for pedestrian and cycle links, including connections to Castle Lane and Littleham (Public Body – Devon County Council).

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### **Exmo\_08 and Exmo\_16 combined - Littleham Fields**

**Total responses: 1**

#### **Main Issues:**

- Concern that further housing in Littleham will worsen existing sewage problems and increase pollution risks (Individual).
- Fears that additional development will place unsustainable pressure on doctors, dentists and local schools, which are already overstretched (Individual).
- Objection to development within an Area of Outstanding Natural Beauty / National Landscape, where the respondent believes housing should not be permitted (Individual).
- Worries about cumulative effects alongside recent and ongoing development at Goodmores Farm and Dinan Way (Individual).
- Concern that local residents' concerns are ignored and that Exmouth does not require more new housing (Individual).

#### **Calls For:**

- Remove Exmo\_08 and Exmo\_16 from the Local Plan due to landscape sensitivity, infrastructure capacity issues and cumulative impacts (Individual).
- Avoid allocating further housing in Littleham until sewage, healthcare and education infrastructure are demonstrably improved (Individual).
- Give greater weight to local objections and avoid large-scale development in this part of Exmouth (Individual).

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### **Exmo\_50 - Exmouth town centre Police Station**

**Total responses: 1**

#### **Main Issues:**

- Historic England notes that the updated policy wording now adequately addresses the concerns they raised at the first Regulation 19 stage regarding heritage impacts and clarity of expectations (Public Body – Historic England).

#### **Calls For:**

- No changes requested; Historic England supports the revised wording and considers the amendments appropriate and sound (Public Body – Historic England).

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### **SD02: Axminster and its development allocations**

**Total responses: 21**

**Axmi\_22 - Land east of Lyme Road**

**Total responses: 1**

**Main Issues:**

- Devon County Council seeks amendments to ensure the possible future relief road is protected from development and safeguarded appropriately (Public Body – Devon County Council).
- No significant objections to the principle of development; comments relate primarily to access, safeguarding and infrastructure alignment (Public Body – Devon County Council).

**Calls For:**

- Amend SD02 text to require layout safeguarding for a potential future relief road connection and associated access requirements (Public Body – Devon County Council).
- Include pedestrian/cycle access via Loup Court with PROW enhancements (Public Body – Devon County Council).

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**GH/ED/80a - Prestaller Farm, Beavor Lane**

**Total responses: 0**

- No responses were received for this site.

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**GH/ED/83 - Land west of Chard Road**

**Total responses: 1**

**Main Issues:**

- One respondent objects due to flood risk, proximity to watercourses and potential effects on River Axe SSSI wildlife (Individual).
- Concern that development would worsen flood problems experienced elsewhere in Axminster following recent growth (Individual).

**Calls For:**

- Remove GH/ED/83 from allocation due to flood risk, ecological constraints and need for local amenity land (Individual).

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**Axmi\_01a - Land west of Musbury Road**

**Total responses: 3**

**(Only comments relate to its removal from the plan)**

**Main Issues:**

- Historic England supports the removal of Axmi\_01a because of known archaeological sensitivity (Public Body – Historic England).
- National Highways notes that removal of Axmi\_01a reduces previous concerns about development pressure near the A35 (Public Body – National Highways).
- Devon County Council also notes and supports the removal of the allocation (Public Body – Devon County Council).

**Calls For:**

- No calls for reinstatement; respondents support its deletion due to heritage and road-network considerations (Public Body – Historic England; Public Body – National Highways; Public Body – Devon County Council).

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**Axmi\_02 - Land east of Musbury Road (Part of Axmi\_02, Axmi\_08 and Axmi\_09 allocation)**

**Total responses: 8**

**Main Issues:**

- Significant archaeological sensitivity is highlighted, including Roman and Romano-British remains and potential impacts on the adjacent Scheduled Monument (Public Body – Historic England; Public Body – Devon County Council; Individuals).
- Historic England notes that although requirements for archaeological evaluation and masterplanning are welcomed, it is not yet demonstrated that the site can be developed without unacceptable harm (Public Body – Historic England).
- Devon County Council removes its objection subject to archaeological evaluation and a layout that minimises impacts on the Scheduled Monument (Public Body – Devon County Council).
- Several individuals emphasise archaeological significance, flood risk, access issues, bat activity and infrastructure constraints, arguing the allocation is unsuitable (Individuals).
- Developers generally support housing allocation but consider some policy requirements too prescriptive, including public transport measures, heritage open space location, and open space requirements (Developers/Landowners).
- Concerns about employment part of allocation when there is an overprovision in the plan and the lack of justification for a community hall and related viability issues (Developers/Landowners).
- Concerns from individuals that the policy does not clearly define the “northern part” of the site intended for heritage-related open space (Individuals).

**Calls For:**

- Some respondents seek removal of Axmi\_02 due to unresolved archaeological, heritage and environmental constraints (Public Body – Historic England; Individuals).

- Others support allocation but request more flexible wording on transport measures, open space, heritage treatment and employment uses (Developers/Landowners – CG Fry & Son).
- Devon County Council requests clearer definition of areas requiring heritage protection and completion of fieldwork before confirming suitability (Public Body – Devon County Council).
- Individuals seek robust archaeological analysis and clearer mapping of any non-developable heritage areas (Individuals).

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**Axmi\_08 – Land north of Axminster town (Part of Axmi\_02, Axmi\_08 and Axmi\_09 allocation)**

**Total responses: 8**

**Main Issues:**

- Archaeological concerns mirror those for Axmi\_02, though DCC notes its objection is now removed subject to archaeological evaluation and sensitive design (Public Body – Devon County Council).
- Historic England highlights risk of harm to archaeological assets and notes uncertainty about whether the policy can be implemented effectively (Public Body – Historic England).
- National Highways welcomes reference to strategic road network considerations in relation to Axmi\_08 (Public Body – National Highways).
- Residents raise concerns regarding archaeology, flooding, access, SWW infrastructure and ecological impacts, especially bat activity (Individuals).

**Calls For:**

- Some individuals and Historic England call for removal unless archaeological investigations clearly demonstrate an acceptable development solution (Public Body – Historic England; Individuals).
- Devon County Council supports allocation with conditions relating to archaeology and layout (Public Body – Devon County Council).
- Developers (CG Fry & Son) request reduced prescriptiveness in heritage and transport requirements (Developers/Landowners).
- National Highways supports inclusion of strategic road network safeguards (Public Body – National Highways).

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**Axmi\_09 - Land east of Musbury Road (Southern parcel) (Part of Axmi\_02, Axmi\_08 and Axmi\_09 allocation)**

**Total responses: 9**

**Main Issues:**

- Devon County Council maintains its objection because archaeological work is incomplete and the site should not be allocated until results are available (Public Body – Devon County Council).
- Historic England similarly raises concerns about landscape and heritage impacts, with uncertainty over whether development is achievable without harm (Public Body – Historic England).
- National Highways comments positively on references within the policy to SRN requirements (Public Body – National Highways).
- Individuals raise concerns similar to Axmi\_02/08 regarding archaeology, infrastructure, and environmental constraints (Individuals).

**Calls For:**

- Remove Axmi\_09 unless archaeological investigations demonstrate that harm can be avoided or mitigated (Public Body – Devon County Council; Public Body – Historic England; Individuals).
- Ensure SRN considerations remain embedded in policy wording (Public Body – National Highways).
- Provide robust, proportionate evidence before confirming allocation (Public Body – Historic England).

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**Axmi\_11c - Land east of Lyme Close**

**Total responses: 0**

- No responses were received for this site.

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**Axmi\_23 - Websters Garage, 9 Lyme Street**

**Total responses: 2**

**Main Issues:**

- Objection to Axmi\_23's allocation on the basis that the site is no longer deliverable for housing following relocation of the Co-op store (Planning Consultants).
- They argue the mixed-use requirement is unjustified and inconsistent with the treatment of the Co-op's own site (Planning Consultants).
- Historic England supports the updated wording regarding conservation area protection (Public Body – Historic England).

**Calls For:**

- Remove Axmi\_23 from the plan or re-evaluate its deliverability due to occupation by the relocated Co-op store (Planning Consultants).
- Provide clarity on whether mixed use (including retail) is realistic and enforceable (Planning Consultants).
- Retain and apply strengthened heritage wording (Public Body – Historic England).

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**Axmi\_24 – Land west of Prestaller Farm**

**Total responses: 0**

- No responses were received for this site.

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**SD03: Honiton and its development allocations**

**Total responses: 24**

**Gitti\_03, Gitti\_04 and Gitti\_05 - Land west of Hayne Lane**

**Total responses: 4**

**Main Issues:**

- The site promoter supports the allocation, including 310 homes and 14.6 ha employment/community uses, and confirms deliverability (Landowner/Developers).
- Gittisham Parish Council strongly objects due to lack of infrastructure evidence, unsustainable location, WSWW capacity issues and concerns highlighted in the Water Cycle Study (Parish Council).
- The National Landscape body raises concerns about major development within or affecting the NL (Public Body – Blackdown Hills NL).

**Calls For:**

- Delete Gitti\_03, Gitti\_04 and Gitti\_05 due to infrastructure, sewage capacity and unsustainable growth concerns (Parish Council; Public Body – Blackdown Hills NL).
- Retain allocation but allow flexibility in commercial/employment uses and confirm access options via Hayne Lane (Developers/Landowners).

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**Honi\_06 - Former Millwater School at Honiton Bottom Road**

**Total responses: 0**

- No responses were received for this site.

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**Honi\_07 - Land adjacent to St Michael's Church**

**Total responses: 5**

**Main Issues:**

- Historic England raises significant concerns over impacts on the Grade II\* church, lychgate and former Sexton's House, and questions whether 30 homes are achievable with required mitigation (Public Body – Historic England).
- They request a concept plan to justify capacity and ensure design responds to heritage and National Landscape setting (Public Body – Historic England).

- The National Landscape body considers the allocation harmful, noting it lies wholly within the designated landscape and risks eroding the separation between town and countryside (Public Body – Blackdown Hills NL).
- A site promoter supports the allocation and confirms deliverability of 30 homes with mitigation, buffers and safe access (Developers/Landowners).

**Calls For:**

- Remove Honi\_07 due to landscape and heritage impacts (Public Body – Blackdown Hills NL; Public Body – Historic England).
- Provide a concept plan and reduce capacity if necessary to avoid harm (Public Body – Historic England).
- Retain allocation for 30 homes with the existing policy approach (Developers/Landowners).

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**Honi\_12 – Land south east of Cuckoo Down Lane**

**Total responses: 1**

**Main Issues:**

- Honiton Town Council supports the removal of Honi\_12 due to its amenity value and location within a National Landscape (Town Council).

**Calls For:**

- Retain removal of Honi\_12 (Town Council).

---

**Honi\_10 – Land at Ottery Moor Lane**

**Total responses: 1**

**Main Issues:**

- A site promoter supports the allocation and notes the site already has outline consent for 21 homes, granted August 2025 (Developers/Planning Consultants).
- They argue the policy wording should be updated to reference the extant consent.

**Calls For:**

- Amend SD03 to state that Honi\_10 benefits from outline consent for 21 dwellings (Developers/Planning Consultants).

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**Honi\_13 – Land at Middle Hill, Church Hill**

**Total responses: 4**

**Main Issues:**

- Historic England has “significant concerns” due to proximity to the Grade II\* Church of St Michael and All Angels and considers setting impacts potentially very high (Public Body – Historic England).

- They recommend deletion as the site sits adjacent to highly sensitive heritage assets within the National Landscape (Public Body – Historic England).
- The National Landscape body also opposes the allocation for its landscape impact (Public Body – Blackdown Hills NL).

**Calls For:**

- Remove Honi\_13 from the Local Plan (Public Body – Historic England; Public Body – Blackdown Hills NL).
- Ensure any retained policy keeps land north of the road open or strengthens hedgerow/tree planting (Public Body – Historic England).

---

**Honi\_14 – Land at Northcote Hill**

**Total responses: 1**

**Main Issues:**

- One individual notes Honi\_14 among a wider group of Honiton sites as contributing to traffic, air quality and infrastructure pressure (Individuals).

**Calls For:**

- No specific modification requested for Honi\_14 beyond general objections to growth in Honiton (Individuals).

---

**Honi\_18 – Land at Kings Road**

**Total responses: 7**

**Main Issues:**

- Historic England welcomes additional text but seeks stronger safeguards for the setting of the Grade II Copper Castle toll house and recommends retaining and enhancing boundary hedgerows (Public Body – Historic England).
- Honiton Town Council objects to the allocation on procedural grounds, stating it was introduced late without proper consultation and raises concerns about access safety (Town Council).
- Multiple individuals object due to unsafe proposed access onto the A35, poor visibility, steep gradients and past highway objections (Individuals).
- A developer supports allocation but argues the National Landscape wording is overly prescriptive and inconsistent with NPPF guidance (Developers/Planning Consultants).
- Network Rail seeks clearer requirements for a high-quality walking/cycling route linking Honi\_18 with GH/ED/39a&b and the station (Public Body – Network Rail).

**Calls For:**

- Remove Honi\_18 due to lack of consultation and highway safety concerns (Town Council; Individuals).

- Amend NL wording to be less prescriptive and more aligned with national policy (Developers/Planning Consultants).
- Add text requiring hedgerow retention and enhancement (Public Body – Historic England).
- Provide a new safe access or reconsider the allocation entirely (Individuals).
- Require clearer active-travel links to GH/ED/39a & b and the station (Public Body – Network Rail).

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### **GH/ED/39a – Land south of Northcote Hill (north of the railway)**

**Total responses: 4**

#### **Main Issues:**

- Site promoter supports the increased capacity from 100 to 115 homes and notes outline permission was resolved to be granted in 2023 (Developers/Landowners).
- National Grid raises concerns about overhead 400kV transmission lines crossing the site and requires policy recognition (Public Body – NGET).
- Woodland Trust highlights proximity to Ancient Woodland and requests buffers of at least 50 metres (NGO – Woodland Trust).

#### **Calls For:**

- Add policy text requiring compliance with NGET design guidance (Public Body – NGET).
- Add wording to protect Ancient Woodland and ensure appropriate buffer distances (NGO – Woodland Trust).

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### **GH/ED/39b – Land south of Northcote Hill (south of the railway)**

**Total responses: 6**

#### **Main Issues:**

- Site promoter argues capacity should increase from 195 to at least 299 homes, supported by technical assessments and a submitted outline application (Developers/Planning Consultants).
- NGET identifies the 400kV overhead route crossing the site and requires policy wording acknowledging constraints (Public Body – NGET).
- The National Landscape body raises concerns about impacts on the Blackdown Hills NL (Public Body – Blackdown Hills NL).
- Network Rail seeks clearer active-travel connectivity between GH/ED/39a/b, Honi\_18 and the station (Public Body – Network Rail).

#### **Calls For:**

- Increase capacity to at least 299 homes (Developers/Planning Consultants).
- Add NGET compliance wording (Public Body – NGET).

- Strengthen NL mitigation or reconsider allocation (Public Body – Blackdown Hills NL).
- Require a dedicated safe walking/cycling link to the station (Public Body – Network Rail).

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### **Employment Land within the Existing Heathpark Industrial Estate**

**Total responses: 0**

- No responses were received for this site.

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

**Total responses: 22**

#### **Otry\_01b – Barrack Farm**

**Total responses: 2**

#### **Main Issues:**

- The landowner supports allocation but argues that capacity should be increased to around 190 homes and 1.25ha of employment land. (Developers/Planning Consultants)
- Claims the site can accommodate more housing efficiently in line with NPPF policy on optimal site use. (Developers/Planning Consultants)
- Suggests coordinated access and design with Otry\_09 to ensure both sites work together. (Developers/Planning Consultants)
- One respondent argues the allocation boundary should extend west to reflect likely roundabout positioning. (Landowner)

#### **Calls For:**

- Increase the allocation to at least 90 homes within the existing boundary or around 190 homes with an expanded boundary. (Developers/Planning Consultants)
- Amend policy wording to reference coordinated access with Otry\_09. (Developers/Planning Consultants)
- Expand the boundary westwards to mirror Otry\_09. (Landowner)
- Reference opportunities for sustainable travel improvements. (Developers/Planning Consultants)

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

**Total responses: 2**

#### **Main Issues:**

- Promoter seeks changes to ensure Otry\_09 and Otry\_01b can share an access solution without fettering either site. (Developers/Planning Consultants)

- Town Council states that a Flood Risk Assessment should be required for the site. (Town Council)

**Calls For:**

- Add policy wording requiring access arrangements to consider future connection to Otry\_01b. (Developers/Planning Consultants)
- Require an FRA for the allocation. (Town Council)

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**Otry\_10 – Land at Salston Barton**

**Total responses: 0**

- No responses were received for this site.

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

**Total responses: 0**

- No responses were received for this site.

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**GH/ED/27 – Land south of Strawberry Lane**

**Total responses: 3**

**Main Issues:**

- The promoter supports the allocation and states that the site is fully deliverable, with a live application demonstrating mitigation of technical issues. (Developers/Planning Consultants)
- Representations highlight completed or ongoing work on FRA, archaeology, access, and pedestrian/cycle connectivity. (Developers/Planning Consultants)
- The site is viewed as important to early delivery due to five-year supply pressures. (Developers/Planning Consultants)

**Calls For:**

- Retain GH/ED/27 as an allocation for around 60 homes. (Developers/Planning Consultants)
- Recognise the planning application as evidence of deliverability. (Developers/Planning Consultants)
- Support policy wording enabling sustainable transport improvements. (Developers/Planning Consultants)

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**Otry\_21 – Gerway Farm**

**Total responses: 44**

**Main Issues:**

- Extensive objections highlight severe transport constraints including narrow roads, congestion, weak pavements and unsafe school routes at Winters Lane, Longdogs Lane and Tip Hill. (Residents)
- Concerns regarding landscape harm, loss of high-quality agricultural land and effects on views including Belbury Castle. (Residents)
- Repeated reference to wastewater capacity issues, storm overflow failures and risks to the River Otter, citing WCS and SWW documents. (Residents)
- Claims the allocation conflicts with the Ottery St Mary Neighbourhood Plan which identifies no need for further strategic allocations. (Residents)
- Biodiversity concerns raised including bats, dormice, raptors, badgers, beavers and recreational impacts on Pebblebed Heaths SAC/SPA. (Residents)
- Archaeological sensitivity noted due to prehistoric and Romano-British features and historic field pattern. (Residents)
- Objections question the increase from around 40 dwellings to 70 despite no infrastructure improvements. (Residents)
- Some promoters support the allocation but seek flexibility or expansion to around 140–150 homes based on a live application. (Developers/Planning Consultants)
- Town Council identifies that any extension of the site would require an FRA. (Town Council)

**Calls For:**

- Remove Otry\_21 from the Local Plan. (Residents)
- Reassess the site due to transport safety, landscape harm, ecological sensitivity and water infrastructure constraints. (Residents)
- Treat drainage and water quality evidence as preventing allocation. (Residents)
- Require safe pedestrian routes and infrastructure upgrades if allocation is retained. (Residents)
- Allow flexibility or increase capacity to around 140–150 homes where supported by landowners. (Developers/Planning Consultants)
- Require an FRA for any enlarged site. (Town Council)

**SD05: Seaton and its development allocations**

**Total responses: 8**

**Seat\_02 - Land at Barnards Hill Lane**

**Total responses: 1**

**Main Issues:**

- Concern that the removal of wording requiring safe access onto Poplar Tree Drive is unjustified and risks compromising highway safety. (Resident)

- Lack of evidence from highways to support deletion of text relating to access and junction mitigation. (Resident)

**Calls For:**

- Restore the requirement for safe access onto Poplar Tree Drive and the need to address the Poplar Tree Drive/Barnards Hill Lane junction. (Resident)
- Retain stronger engineered access requirements rather than weaker “traffic calming” language. (Resident)

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**Seat\_03 – Land to the south of Harepath Hill**

**Total responses: 1**

**Main Issues:**

- Concern that replacing the specific 55m contour line with “around the 55m contour line” introduces ambiguity and risks harmful development too close to existing dwellings. (Resident)
- Concerns that approximation could lead to future reinterpretation during planning appeals, harming privacy and residential amenity. (Resident)

**Calls For:**

- Reinstate the fixed 55m contour line rather than “around the.” (Resident)
- Provide clearer policy wording to avoid reinterpretation that could lead to adverse amenity impacts. (Resident)

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**Seat\_05 – Land off Harepath Road**

**Total responses: 1**

**Main Issues:**

- Support for the employment land element north of the existing industrial estate. (Resident)
- Support for requirement for harmonised vehicular access off Harepath Road as safest access point. (Resident)

**Calls For:**

- Retain requirement for access from Harepath Road as the primary vehicular access. (Resident)
- Ensure bus stop enhancements and pedestrian/cycle connections are secured. (Resident)

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**Seat\_13a – Land west of Axeview Road**

**Total responses: 4**

**Main Issues:**

- Concerns regarding surface water flooding from development at Seat\_13a. (Resident)
- Objections that the site lies immediately north of a Scheduled Monument and development would harm its setting and archaeological significance. (Historic England)
- DCC raises insufficient information on archaeological interest associated with the Scheduled Monument and maintains objection. (Devon County Council)
- Support the inclusion of the final sentence relating to Beer Quarry and Caves SAC. (Resident).

**Calls For:**

- Reconsider allocation due to potential surface water flooding impacts. (Resident)
- Remove the allocation due to harm to the Scheduled Monument and its setting. (Historic England)
- Provide further archaeological evidence or delete allocation in absence of this. (Devon County Council)

**SD06: Sidmouth and its development allocations**

**Total responses: 54**

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

**Total responses: 6**

**Main Issues:**

- Objection to increase from 127 to 160 homes without prior consultation or clear justification. (Residents)
- Concern that the site lies within the National Landscape and conflicts with policy requiring the highest level of protection. (Residents)
- Objection that the site extends beyond the settlement boundary without neighbourhood plan support. (Residents)
- Concerns over absence of affordable housing provision in the draft allocation. (Residents)
- Developers state the site is suitable, available and supported by technical work and welcome the move to “around 160 homes.” (Developers/Planning Consultants)

**Calls For:**

- Reverse the increase to 160 homes or reconsider the allocation entirely. (Residents)
- Remove the site due to conflict with National Landscape and settlement boundary policies. (Residents)
- Clarify or justify landscape wording to avoid unrealistic requirements. (Developers/Planning Consultants)
- Retain allocation for around 160 homes with wording amended to ensure realistic expectations linked to landscape design. (Developers/Planning Consultants)

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

**Total responses: 31**

#### **Main Issues:**

- Several residents raise major concerns that the site lies entirely within the National Landscape and constitutes major development contrary to national policy tests. (Residents)
- Concerns over removal of the previous 30-home capacity reduction to 15 homes without robust landscape evidence. (Developers/Planning Consultants and Residents)
- Objections on grounds of Green Wedge conflict and settlement coalescence between Sidford and Sidbury. (Residents)
- Concern that the local infrastructure (roads, drainage, medical facilities, schools) is already overstretched. (Residents)
- Developers argue the site is suitable, well related to the settlement and capable of accommodating at least 30 homes, with potential for expansion into Sidm\_06b. (Developers/Planning Consultants)
- Objections that the consultation process lacked transparency. (Residents)

#### **Calls For:**

- Remove Sidm\_06a from the Local Plan due to National Landscape, Green Wedge and infrastructure constraints. (Residents)
- Restore or increase site capacity to around 30 homes or expand to include parts of Sidm\_06b to improve design and deliver infrastructure. (Developers/Planning Consultants)
- Require clear justification for landscape constraints and present evidence transparently. (Residents)
- Demonstrate exceptional circumstances if development is retained within the National Landscape. (Residents)

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

**Total responses: 17**

#### **Main Issues:**

- Objection that the site lies entirely within the National Landscape and fails the tests for major development in designated landscapes. (Residents)
- Strong concerns over access feasibility: Windsor Mead is a cul-de-sac with no realistic through-road, and Burscombe Lane is narrow, lacks footways, and has a dangerous junction with the A3052. (Residents)
- Claims that access may require a Compulsory Purchase Order and that this uncertainty undermines allocation deliverability. (Residents)

- Concerns regarding flooding, surface water runoff and inadequate drainage capacity. (Residents)
- Objection that the site was previously rejected and has been reintroduced without clear consultation. (Residents)
- Concerns about heritage impact, including proximity to Romano-British settlement evidence. (Residents)
- Objection that the site conflicts with settlement boundary policy and the Sid Valley Neighbourhood Plan. (Residents)

**Calls For:**

- Delete Sidm\_31 from the Local Plan due to access, landscape, drainage and policy conflict. (Residents)
- Require robust access solutions, drainage assessments and heritage investigation if retained. (Residents)
- Correct evidence regarding road safety at the A3052 junction. (Residents)
- Demonstrate exceptional circumstances for development within the National Landscape. (Residents)

**SD07: Development allocations at Broadclyst**

**Total responses: 8**

**Brcl\_12 – Land west of Whimple Road, Broadclyst**

**Total responses: 8**

**Main Issues:**

- Developers support allocation but argue capacity should increase from 100 to 145 homes to make effective use of land. (Developers/Planning Consultants)
- Developer emphasises the sustainability, deliverability and technical soundness of the site, drawing on an active outline application (25/1133/MOUT). (Developers/Planning Consultants)
- Concerns raised by residents about flooding, with repeated references to saturated ground, overflows and Winter Gardens flooding regularly. (Residents)
- Significant concerns about traffic, congestion, narrow lanes, lack of pavements and school-related vehicle pressure around Town End. (Residents)
- Concerns about noise, privacy, security and increased footfall where an existing lightly-used footpath is proposed to become a main access route. (Residents)
- Residents highlight perceived lack of sewage capacity and regular overflows, contrary to developer representations. (Residents)
- Concerns that the playing field proposed on site lacks dedicated parking and will intensify parking pressure along Town End. (Residents)

**Calls For:**

- Increase site capacity to around 145 dwellings to optimise land use and respond to district housing need. (Developers/Planning Consultants)
- Ensure pedestrian/cycle connectivity is redesigned to avoid overloading a narrow residential footpath. (Residents)
- Require robust drainage solutions and evidence addressing Winter Gardens flooding. (Residents)
- Require comprehensive road safety improvements, pavements and cycle routes associated with school travel. (Residents)
- Provide detailed assessment of sewage system capacity and mitigation. (Residents)

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

**Total responses: 7**

#### **Main Issues:**

- Brcl\_29 is expected to come forward with Brcl\_12 under a joint masterplan requiring access through Brcl\_12, which developer supports. (Developers/Planning Consultants)
- Residents express strong concerns about the proposed footpath link emerging near Town End, citing lack of pavements and high traffic volumes. (Residents)
- Concerns that cumulative development at Brcl\_12 + Brcl\_29 will increase flooding along Town End and adjoining lanes. (Residents)
- Heritage concerns raised about effects on the Conservation Area and proximity to listed buildings. (Residents)
- Concerns about village infrastructure capacity, including GPs, schools, parking, road safety and drainage. (Residents)

#### **Calls For:**

- Require coordinated masterplanning between Brcl\_12 and Brcl\_29, including integrated access. (Developers/Planning Consultants)
- Re-site or redesign pedestrian routes to avoid unsafe Town End exit points. (Residents)
- Secure flood mitigation measures for Winter Gardens, Town End and wider Broadclyst lanes. (Residents)
- Require heritage-sensitive design respecting listed buildings and Conservation Area setting. (Residents)

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

**Total responses: 3**

#### **Budl\_02 – Land at Barn Lane, Knowle, Budleigh Salterton**

**Total responses: 3**

#### **Main Issues:**

- Developer supports allocation of 35 homes but says the policy wording is too restrictive, especially the requirement to “conserve and enhance the natural beauty of the site,” which they argue conflicts with enabling development. (Developers)
- Concern that NL wording is inconsistent with other allocations and overly prescriptive about planting, buffers and lighting. (Developers)
- Otter Valley Association objects as the site is inside the National Landscape boundary and cannot meet the exceptional-circumstances test. (Community Group)
- Sewage capacity concerns raised for the wider River Otter catchment. (Community Group)
- One resident supports Budl\_02 as the most suitable site, provided infrastructure keeps pace. (Resident)

**Calls For:**

- Make policy wording more positive and landscape-led without preventing development. (Developers)
- Align NL requirements with other site policies and remove overly prescriptive details. (Developers)
- Reconsider allocation due to National Landscape impacts. (Community Group)
- Address sewage capacity issues before further growth. (Community Group)
- Ensure infrastructure supports 35 new dwellings if allocation proceeds. (Individual)

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**SD09 – Development allocations at Colyton**

**Total responses: 1**

**Coly\_02 - Land at Hillhead**

**Total responses: 0**

- No responses were received for this site.

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

**Total responses: 1**

**Main Issues:**

- DCC welcomes the strengthened wording requiring footway improvements along the site frontage. (Devon County Council)
- No objections or concerns recorded in the supplied document beyond technical clarification.

**Calls For:**

- Ensure footway improvements are delivered as part of the development. (Devon County Council)

## **SD10 – Development allocations at Lympstone**

**Total responses: 3**

### **Lymp\_01 – Little Paddocks, 22 Underhill Crescent**

**Total responses: 0**

- No responses were received for this site.

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## **GH/ED/72a – Land at Meeting Lane**

**Total responses: 1**

### **Main Issues:**

- Flood-risk wording change was not correctly explained, potentially preventing residents from recognising the significance of the modification. (Lympstone Water Quality Group)
- Serious concern that Lympstone is already at very high flood risk and cannot cope with any additional risk from new development. (Lympstone Water Quality Group)
- Claim that the site is unsuitable because development with any flood-risk component should be deleted from the Plan. (Lympstone Water Quality Group)
- Concern that the Plan has not demonstrated whether alternative sites elsewhere in East Devon could deliver the 42 homes without flood risk. (Lympstone Water Quality Group)
- Observation that Lympstone has high housing allocations but no supporting infrastructure upgrades planned. (Lympstone Parish Council)

### **Calls For:**

- Delete GH/ED/72a from the Local Plan due to unacceptable flood-risk impacts. (Lympstone Water Quality Group)
- Require evidence there are no alternative sites that would not have a risk of flooding. (Lympstone Water Quality Group)
- Provide actual infrastructure upgrades (active travel, Green Infrastructure, etc.) if Lympstone continues to receive major allocations. (Lympstone Parish Council)

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## **GH/ED/73 – Land north west of Strawberry Hill**

**Total responses: 0**

- No responses were received for this site.

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

**Total responses: 4**

### **Wood\_06 – Land to rear of Orchard House, Globe Hill**

**Total responses: 0**

- No responses were received for this site.

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**Wood\_09 – Land off Globe Hill**

**Total responses: 1**

**Main Issues:**

- Historic England welcomes strengthened design requirements to conserve and enhance settings of heritage assets. (Historic England)

**Calls For:**

- Retain enhanced heritage-led design wording. (Historic England)

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**Wood\_10 – Land at Gilbrook**

**Total responses: 1**

**Main Issues:**

- Historic England welcomes strengthened design requirements to conserve and enhance settings of heritage assets. (Historic England)

**Calls For:**

- Retain enhanced heritage-led design wording. (Historic England)

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**Wood\_16 – Land south of Broadway**

**Total responses: 2**

**Main Issues:**

- Developer supports the allocation but argues policy wording should reflect that outline consent (22/2838/MOUT) already establishes key design parameters. (Developers/Planning Consultants)
- Concern that new policy text could unduly constrain the reserved matters process, particularly regarding Conservation Area references and watercourse buffers. (Developers/Planning Consultants)
- Welcome additional text relating to Woodbury Conservation Area. (Historic England)

**Calls For:**

- Amend wording to explicitly recognise existing outline consent and avoid imposing additional or conflicting requirements. (Developers/Planning Consultants)
- Modify footpath wording to reflect the need for a PROW diversion rather than retention of the existing route. (Developers/Planning Consultants)

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**Wood\_20 – Land east of Town Lane**

**Total responses: 0**

- No responses were received for this site.

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## **SD12: Development allocation at Broadhembury**

**Total responses: 6**

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

**Total responses: 5**

#### **Main Issues:**

- The allocation is considered to constitute major development within the setting of the Blackdown Hills National Landscape, which is viewed as inappropriate and contrary to national and local landscape policy. (Parish Council; Blackdown Hills National Landscape body)
- Concerns are raised about harm to the character and appearance of the Broadhembury Conservation Area, including impacts on key views, village form, and nearby listed buildings. (Parish Council)
- The extension of the Built-Up Area Boundary to include the site is considered unjustified and inconsistent with the existing settlement pattern. (Parish Council)
- The allocation is said to conflict with local and national policies, including those relating to National Landscapes, strategic visual importance, conservation areas, and the council's heritage strategy. (Parish Council)

#### **Calls For**

- Remove the allocation of Brhe\_09 from the Local Plan due to unacceptable landscape and heritage impacts. (Parish Council)
- Consider alternative sites within Broadhembury which would result in less harm to heritage assets and the National Landscape. (Parish Council)

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## **SD13: Development allocation at Chardstock**

**Total responses: 1**

### **Char\_04a – Land off Green Lane**

**Total responses: 1**

#### **Main Issues:**

- Developer expresses concerns that legal compliance issues have arisen from use of wrong NPPF basis for plan-making. (Developers/Planning Consultants)
- Developer supports highways, landscape and visual findings showing the site to be sustainable with limited harm. (Developers/Planning Consultants)

- Concerns that wording on PROW connection is ambiguous and risks undermining deliverability. (Developers/Planning Consultants)
- Suggestion that boundary extension to include northern parcel would enhance design, landscaping and integration. (Developers/Planning Consultants)

**Calls For:**

- Clarify or remove PROW connection requirement to protect deliverability. (Developers/Planning Consultants)
- Extend allocation boundary to include the northern parcel for improved scheme layout. (Developers/Planning Consultants)
- Correct plan-making basis for national policy compliance. (Developers/Planning Consultants)

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**SD15: Development allocation at Dunkeswell**

**Total responses: 1**

**Dunk\_05 – Broomfields**

**Total responses: 1**

**Main Issues:**

- The Otter Valley Association objects that Dunk\_05 (43 homes) lies inside the National Landscape (NL) and therefore conflicts with policies requiring the highest level of landscape protection. (Community Group)
- Concern that development within the NL or affecting its setting should only occur where harm is avoided and where it demonstrably conserves and enhances the NL's special qualities — which they argue Dunk\_05 does not. (Community Group)
- Assertion that major development in a National Landscape is only justified in exceptional circumstances, and Dunk\_05 does not meet this threshold. (Community Group)
- Wider concern about cumulative impacts on the River Otter catchment, particularly sewage capacity, stating that adding 1,833 homes across the plan area will worsen an already "dire" situation. (Community Group)

**Calls For:**

- Remove Dunk\_05 from the Local Plan due to its location within the National Landscape and failure to meet the "exceptional circumstances" test. (Community Group)
- Apply NL protection policies consistently so that development avoids harm and contributes to protection and enhancement of landscape character. (Community Group)
- Address sewage capacity issues in the River Otter catchment before allocating further housing. (Community Group)

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**SD16: Development allocation at East Budleigh**

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**Total responses: 2**

**Ebud\_01 – Land off Frogmore Road**

**Total responses: 2**

**Main Issues:**

- Representation argues Collins Park is a safer, more appropriate alternative and that Ebud\_01 fails Policy AR01 tests. (Individual)
- Concerns about unsafe pedestrian crossing of the B3178 and hazardous vehicle access onto Frogmore Road. (Individual)
- Site lies on Grade 1 farmland and would harm Otter Valley views and conflict with NL policies. (Individual)
- Flooding concerns: Frogmore Road is periodically impassable and near Flood Zone 3. (Individual)
- Otter Valley Association objects as the site is inside the National Landscape. (Community Group)
- Concern that extra homes will worsen sewage issues in the River Otter catchment. (Community Group)

**Calls For:**

- Reassess alternatives and consider allocating Collins Park instead. (Individual)
- If retained, require crossing improvements, safer access, landscape mitigation, and flood measures. (Individual)
- Remove Ebud\_01 due to National Landscape impacts. (Community Group)
- Address sewage capacity issues before allocating development. (Community Group)

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**SD17: Development allocations at Exton**

**Total responses: 3**

**Wood\_01 – Land west of Oaklands**

**Total responses: 0**

- No responses were received for this site.

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

**Total responses: 2**

**Main Issues:**

- Historic England supports strengthened heritage text. (Historic England)
- DCC requests wording requiring a coordinated access strategy for both Exton sites. (DCC)

- Developer supports allocation and delivery of 39 homes but disagrees with requirement for open space in the northern part; argues only the north-west corner is sensitive to the listed farmhouse. (Developers/Planning Consultants)

**Calls For:**

- Add coordinated access-strategy text. (DCC)
  - Change open-space requirement to “north-west” only. (Developers/Planning Consultants)
  - Retain strengthened heritage requirements. (Historic England)
- 

**SD18: Development allocations at Feniton**

**Total responses: 8**

**Feni\_5 – Land at Burlands Mead**

**Total responses: 4**

**Main Issues:**

- DCC requests clearer wording to ensure development maximises opportunities for sustainable travel improvements. (Devon County Council)

**Calls For:**

- Add policy text requiring the allocation to support localised improvements to sustainable transport modes. (Devon County Council)
- 

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

**Total responses: 8**

**Main Issues:**

- Developer strongly supports allocation, citing site sustainability, deliverability and active outline application progressing positively. (Developers/Planning Consultants)
- No objections or constraints identified in the representations supplied.

**Calls For:**

- Maintain Feni\_08 allocation as drafted. (Developers/Planning Consultants)
- 

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

**Total responses: 0**

- No responses were received for this site.
- 

**SD19: Development allocation at Hawkchurch**

**Total responses: 1**

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### **Hawk\_01 – Norton Store**

**Total responses: 1**

#### **Main Issues:**

- Developer supports allocation in principle but objects that the site boundary hasn't been expanded, despite evidence the wider land is suitable, available and deliverable. (Developers)
- Argues the wider site could deliver up to 38 homes, including affordable housing, well related to the village. (Developers)
- States SD19 is not justified because it ignores wider site capacity and planning merits. (Developers)
- Objection to new contamination-assessment wording, described as unnecessary duplication of existing validation/NPPF requirements. (Developers)
- Notes the policy does not acknowledge the significant remediation costs implied. (Developers)

#### **Calls For:**

- Extend the allocation to include the wider land parcel capable of delivering up to 38 dwellings. (Developers)
- Remove duplicated contamination-assessment text. (Developers)
- Update policy wording to reflect the site's deliverability and contribution to local housing needs. (Developers)

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

**Total responses: 7**

### **Kilm\_09b – Land east of George Lane**

**Total responses: 5**

#### **Main Issues:**

- Historic England welcomes text ensuring retention of adequate parking for the listed pub and protection of its setting. (Historic England)
- Historic England recommends further refinement to make policy wording clearer and more consistent with national heritage policy. (Historic England)

#### **Calls For:**

- Amend text to emphasise conservation of the heritage significance derived from the pub's setting and boundary planting. (Historic England)

---

### **Kilm\_10 – Land west and south west of the Old Inn**

**Total responses: 2**

**Main Issues:**

- Developer objects to requirement to “conserve and enhance the natural beauty of the site,” arguing it exceeds NPPF requirements for development in National Landscapes. (Developers/Planning Consultants)
- Concern that allocation wording may impose overly restrictive local requirements inconsistent with national policy. (Developers/Planning Consultants)

**Calls For:**

- Amend policy so that design requirements relate to conserving and enhancing the wider protected landscape rather than the site itself. (Developers/Planning Consultants)

**SD21: Development Allocation at Musbury**

**Total responses: 1**

**Musb\_01a – Land at Baxter’s Farm**

**Total responses: 1**

**Main Issues:**

- Historic England supports new text clarifying design requirements to conserve and enhance settings of heritage assets. (Historic England)

**Calls For:**

- Keep added heritage protection requirements within the policy. (Historic England)

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**SD22: Development allocations at Newton Poppleford**

**Total responses: 4**

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

**Total responses: 3**

**Main Issues:**

- Otter Valley Association objects that Newt\_04 lies inside the National Landscape, conflicting with policy OL02 and requiring exceptional-circumstances justification, which they say is absent. (Community Group)
- Concern over worsening River Otter sewage capacity, especially with cumulative growth. (Community Group)
- Woodland Trust notes Newt\_04 is adjacent to Ancient Woodland, requiring strong protection measures and wider buffers. (Woodland Trust)
- Developer objects to the fixed 20-dwelling cap, arguing no capacity testing justifies it and that it conflicts with efficient-use-of-land policy DS02. (Developers/Planning Consultants)

**Calls For:**

- Remove or reconsider Newt\_04 because it is inside the National Landscape. (Community Group)
- Ensure policies protect adjacent Ancient Woodland with significant buffers (min 50m) and appropriate wording. (Woodland Trust)
- Change policy wording to “around 20 dwellings” to introduce flexibility and allow efficient land use. (Developers/Planning Consultants)

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

**Total responses: 3**

#### **Main Issues:**

- Otter Valley Association objects as Newt\_05 is also inside the National Landscape, again requiring exceptional-circumstances justification they say is missing. (Community Group)
- Concern over worsening River Otter sewage capacity, especially with cumulative growth. (Community Group)
- Woodland Trust states Newt\_05 is adjacent to Ancient Woodland, requiring review and stronger habitat-protection wording. (Woodland Trust)
- Developer objects to the fixed allocation of 20 dwellings, arguing it lacks evidence, restricts efficient use of land, could constrain affordable housing delivery, and conflicts with DS02. (Developers/Planning Consultants)

#### **Calls For:**

- Reconsider or remove Newt\_05 due to National Landscape impacts. (Community Group)
- Add policy clauses ensuring protection and buffering of Ancient Woodland. (Woodland Trust)
- Amend wording to allow flexibility: “around 20 dwellings” rather than a fixed number. (Developers/Planning Consultants)

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

**Total responses: 2**

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

**Total responses: 2**

#### **Main Issues:**

- Welcomes refined text which resolves previously raised issues. (Historic England)
- Objection to development at Otto\_01, stating the site lies within the National Landscape boundary and raising concern about landscape and visual harm. (Otter Valley Association)

- Concerns about Otterton’s sensitivity to development and the need to avoid harm to village character and setting. (Otter Valley Association)

**Calls For:**

- Reconsider or remove Otto\_01 due to its position within the National Landscape and associated landscape sensitivity. (Otter Valley Association)

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**SD24: Development allocation at Payhembury**

**Total responses: 5**

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

**Total responses: 5**

**Main Issues:**

- Developer strongly supports allocation for ~15 homes and says the site is suitable, deliverable and supports village facilities. (Developers)
- Developer argues the allocation boundary is too tight and should be expanded to match their Indicative Layout Plan. (Developers)
- Parish Council objects: 15 homes = 12% village increase; recent growth already significant. (Parish Council)
- Infrastructure concerns: sewage overflows, full primary & secondary schools, stretched GP/dentist capacity. (Parish Council)
- Transport issues: single-track lanes, no bus service, unsafe access on blind bend. (Parish Council)
- Environmental concerns: protected mature oaks, bat species, and rising land causing high visibility of development. (Parish Council)
- Residents highlight dangerous access, marshy ground, springs, drainage problems and protected hedgerows. (Residents)
- Residents note the site was judged unsuitable in 2022, with no change in constraints. (Individuals)

**Calls For:**

- Amend boundary to allow proper access, open space and landscape mitigation. (Developers)
- Change wording to “around 15 homes” for flexibility. (Developers)
- Remove or reconsider allocation due to infrastructure limits, unsafe access and environmental impacts. (Parish Council; Residents)
- Protect trees/hedgerows and fully address springs, drainage and highways issues if allocation proceeds. (Individuals)

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**SD25: Development allocation at Plymtree**

**Total responses: 1**

### **Plym\_03 – Land north of School**

**Total responses: 1**

#### **Main Issues:**

- Historic England supports strengthened policy wording to ensure conservation and enhancement of heritage asset settings. (Historic England)

#### **Calls For:**

- Retain updated heritage-led design wording in policy. (Historic England)
- 

### **SD26: Development allocation at Sidbury**

**Total responses: 9**

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

**Total responses: 9**

#### **Main Issues:**

- Developer strongly supports allocation and highlights pending outline application for 43 dwellings consistent with draft policy. (Developers/Planning Consultants)
- Support from DCC for clearer text regarding delivery of the Sidbury–Sidford cycle route. (Devon County Council)
- Sid Vale Association raises concerns regarding National Landscape protection, flood risk, heritage impacts, and drainage requirements. (Residents/Community Group)
- Concerns that adequate drainage must rely on public sewers rather than off-highway runoff systems. (Residents/Community Group)
- Concern raised about achieving 20% BNG on a sloping agricultural site with existing flood issues. (Residents/Community Group)

#### **Calls For:**

- Retain allocation and ensure cycle route delivery forms part of early phases. (Developers/Planning Consultants)
  - Address flood risk concerns through public sewer connection and robust drainage design. (Residents/Community Group)
  - Ensure heritage assessment addressing proximity to Sidbury Castle is secured before permission. (Residents/Community Group)
  - Confirm BNG and drainage mitigation are achievable prior to development. (Residents/Community Group)
- 

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

**Total responses: 0**

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

**Total responses: 0**

- No responses were received for this site.

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**SD28: Development allocations at West Hill**

**Total responses: 0**

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

**Total responses: 0**

- No responses were received for this site.

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

**Total responses: 0**

- No responses were received for this site.

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

**Total responses: 17**

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

**Total responses: 1**

**Main Issues:**

- Historic England supports additional text requiring archaeological assessment before development commences. (Historic England)

**Calls For:**

- Retain strengthened archaeological assessment wording. (Historic England)

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

**Total responses: 5**

**Main Issues:**

- Historic England supports strengthened policy wording to ensure design conserves and enhances the setting of heritage assets. (Historic England)
- Developer (DABB Partnership) supports allocation of Whim\_11 and confirms the principle of development is acceptable. (Developers/Planning Consultants)
- Developer notes that some new text duplicates existing policy requirements (e.g., AR01, HE02) and may be unnecessary. (Developers/Planning Consultants)

- Concerns raised that development at Whim\_11 could contribute to downstream flooding, with residents stating properties below the site are already susceptible and flood risk has not been adequately addressed. (Residents)
- Residents argue that sites liable to flood should not be allocated even with an FRA, as mitigation may fail and affected households would have no recourse. (Residents)

**Calls For:**

- Retain allocation of Whim\_11 but remove duplicated policy wording that restates higher-level requirements. (Developers/Planning Consultants)
  - Ensure detailed flood-risk assessment fully addresses downstream impacts and demonstrates robust mitigation. (Residents)
  - Consider dismissing the allocation if flooding risks cannot be conclusively addressed prior to allocation. (Residents)
  - Retain strengthened heritage-led design wording. (Historic England)
- 

## **6. Mitigating Climate Change**

**Total responses: 42**

### **CC01 – Climate Emergency**

**Total responses: 9**

**Main Issues:**

- Many respondents state the policy is too vague, unclear what development must actually do, and duplicates later policies. (Planning consultants; Developers)
- Several representations say CC01 should be introductory text only, not a policy. (Planning consultants; Developers)
- Some object that CC01 conflicts with national guidance and should not set standards beyond Building Regulations. (HBF)
- Community groups say CC01 should require net-zero development, not “support movement to net-zero”. (Otter Valley Association; Residents)
- Requests to include LNRS and BNG as climate-mitigation tools. (Resident)

**Calls For:**

- Convert CC01 into introductory text, not policy wording. (Planning consultants; Developers)
  - Require new development to be net-zero and ensure carbon-positive development offsets emissions in real time. (Community groups)
  - Add LNRS/BNG references as climate-mitigation mechanisms. (Resident)
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### **CC02 – Net-Zero Carbon Development**

**Total responses: 8**

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**Main Issues:**

- Repeated objections that CC02 goes beyond Building Regulations, contrary to national policy and Written Ministerial Statements. (Developers; HBF)
- Developers say the policy requires detailed design evidence too early, which is unrealistic at outline stage. (Planning consultants; Developers)
- Lack of viability evidence to support going beyond the Future Homes Standard. (Developers; HBF)
- Concern from community group that CC02 should require technologies now, not just allow retrofit. (Otter Valley Association)
- Exmo\_20 promoter supports low-carbon intent but warns the policy needs flexibility for strategic sites. (3West)

**Calls For:**

- Align CC02 strictly with Building Regulations and the Future Homes Standard, not draft standards. (Developers; HBF)
- Allow detailed carbon/energy information to be provided later by condition, not at outline stage. (Developers)
- Remove CC02 entirely as duplicative/unjustified. (Some developers)
- Strengthen CC02 to require all achievable technologies to be installed upfront. (Community group)

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

**Total responses: 2**

**Main Issues:**

- Historic England welcomes removal of mapped wind areas but says the revised policy still needs stronger heritage safeguards, especially for larger turbines. (Historic England)
- Some community support for the revised final paragraph wording. (Otter Valley Association)

**Calls For:**

- Add explicit requirement to assess impacts on designated & non-designated heritage assets. (Historic England)
- Require Heritage Impact Assessment + Landscape & Visual Impact Assessment with visualisations for wind proposals. (Historic England)

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## **CC04 – Energy Storage**

**Total responses: 3**

**Main Issues:**

- Otter Valley Association suggests strengthening wording to “minimises reliance on fossil fuels” rather than “reduces”. (Otter Valley Association)

- Battery storage developers say the policy is too vague on where storage is acceptable; needs spatial clarity and evidence-based mapped areas. (Individual)

**Calls For:**

- Use evidence from the Greater Exeter Low-Carbon Evidence Base to identify suitable areas for energy storage. (Individual)
- Strengthen fossil-fuel minimisation wording. (Community group)

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## **CC05 – Heat Networks**

**Total responses: 6**

**Main Issues:**

- Multiple developers argue policy is undeliverable, as connection to heat networks is outside developer control. (Developers/Promoters)
- Concerns over cost, lack of consumer protections, and uncertainty about decarbonisation of existing networks (e.g. Cranbrook). (Developers; HBF)
- Some community groups argue CC05 should go further and create a presumption in favour of heat networks, not only feasibility assessment. (Otter Valley Association)
- Lack of clarity over where heat networks exist. (Developers)

**Calls For:**

- Remove policy entirely as unjustified. (Developers; HBF)
- If retained, map heat-network locations and add flexibility for site-by-site feasibility. (Developers)
- Strengthen CC05 to explicitly favour establishing new networks. (Community group)

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## **CC06 – Embodied Carbon**

**Total responses: 7**

**Main Issues:**

- Some developers say CC06 is not justified and duplicates national responsibilities; request deletion. (Developers/Promoters)
- Others support the principle but warn many emissions are outside developer control, and assessments may not be practical at outline stage. (Planning consultants)
- Concerns about monitoring, feasibility, and impacts on viability/housing delivery. (HBF; Planning consultants)
- Otter Valley Association welcomes CC06 but asks how embodied carbon counts toward the 2040 net-zero target.
- Residents raise concerns about PFAS in drainage and the role of existing buildings in reducing embodied carbon.

**Calls For:**

- Delete CC06 entirely. (Developers; HBF)

- Provide transitional periods and clearer monitoring processes. (HBF)
- Clarify stage at which assessments are required; allow targets at outline, detail at reserved matters. (Planning consultants)
- Address how embodied carbon contributes to the 2040 net-zero pathway. (Community group)

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

**Total responses: 66**

### **AR01: Flooding**

**Total responses: 21**

#### **Main Issues:**

- Repeated concern that AR01 is not aligned with the updated NPPF (Dec 2024) paragraph 175 on the Sequential Test; requires a full review. (Planning consultants, Developers)
- Policy unclear on when the Sequential Test applies (e.g., POS in flood zones doesn't require it). (Developers)
- Requirement for SuDS to reduce runoff below greenfield rates is said to misinterpret DCC guidance (which requires not exceeding greenfield). (Developers)
- Some say AR01 is overly prescriptive, adds onerous requirements and affects viability. (Planning Consultants, Developers)
- Surface water flooding concerns raised, stating EA fluvial zones alone are insufficient. (Residents)
- Need to reference Critical Drainage Areas and forthcoming updated CDA guidance. (Environment Agency)
- Calls for AR01 to address all climate-change adaptation (heat, storms, shading, hardstanding) not only flooding. (Community groups)
- Concerns that SuDS tanks may introduce PFAS. (Individual)

#### **Calls For:**

- Update AR01 to align fully with updated NPPF paragraph 175. (Developers; Planning consultants)
- Clarify Sequential Test requirements and apply proportionately. (Developers)
- Reword SuDS requirements to reflect DCC guidance: do not exceed greenfield rates, not "below". (Developers)
- Include CDA-specific wording; highlight that CDA standards take precedence. (Environment Agency)
- Strengthen policy to require SuDS and permeable hardstanding. (Community groups)
- Expand AR01 to wider climate-adaptation matters (heat, storms, shade, green spaces). (Community groups)

- Remove new additions considered overly onerous (e.g., 5m FZ2 buffer, car-park restrictions). (Developers)

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## **AR02: Water Efficiency**

**Total responses: 33**

### **Main Issues:**

- Many argue the policy is not justified, as East Devon is not a designated water-stress area, so requiring 110 l/p/d lacks evidence.
- Widespread concern that the Water Cycle Study is incomplete or inaccurate, making the policy's basis unclear.
- Significant worries about sewage treatment capacity (Honiton, Feniton, Fluxton, Otterton, Maer Lane), with claims that growth cannot proceed until upgrades occur.
- Developers say the policy places responsibilities on them (e.g. proving network capacity) that sit legally with South West Water, not applicants.
- Several representations say the policy wording is too vague or duplicative of existing legislation (risk assessments, Appropriate Assessment, water-environment enhancement).
- Community groups want the policy to be stronger, with no opt-outs and stricter water efficiency.
- Calls for AR02 to reference national SuDS standards and integrated water management.
- Requests for no further housing load in key constrained catchments (Honiton, Feniton, Fluxton) until treatment deficits are addressed.

### **Calls For:**

- Remove or soften the 110 l/p/d requirement, or align it with Building Regulations unless robust evidence is provided.
- Introduce clear phasing/Grampian conditions so development cannot be occupied before wastewater upgrades.
- Amend AR02 so developers are not required to evidence sewer/water capacity.
- Strengthen policy to require effective water-efficiency, storage and recycling measures.
- Add explicit links to national SuDS standards, integrated water management and catchment-wide mitigation.
- Include specific restrictions on development in over-capacity catchments until infrastructure is upgraded.
- Improve monitoring: use consistent metrics, require transparent spill data, and link phasing to SWW's AMP/DWMP timelines.

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

**Total responses: 2**

**Main Issues:**

- EA supports approach but requests minor clarifications in terminology and mapping of two CCMA's (Seaton and Beer). (Environment Agency)
- Calls for stronger protection: no development on land likely needed for rollback or future coastal processes. (Community groups)
- Some feel language around short/medium/long-term risk could mislead (risk does not "go away"). (Environment Agency)

**Calls For:**

- Reinstate or extend CCMA areas at Seaton and Beer as per EA mapping suggestions. (Environment Agency)
- Include clear policy preventing development where rollback corridors or natural coastal processes must be protected. (Community groups)
- Provide supplementary guidance for decision-making in CCMA's. (Environment Agency)

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

**Total responses: 0**

- No responses were received for this site.

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**AR05: Development Affecting Coastal Erosion**

**Total responses: 1**

**Main Issues:**

- Historic England welcomes added text clarifying interaction with Policy PB10 for the Jurassic Coast WHS.

**Calls For:**

- No additional changes requested.

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**8. Meeting Housing Needs**

**Total responses: 94**

**HN01 – Housing to Address Needs**

**Total responses: 8**

**Main Issues**

- Concern that the plan should meet full housing need, not just the 80% transitional minimum; some say 20,909 homes is too low and risks under-provision. (Planning consultants; Landowners/Developers)

- Others question the overall housing number, arguing it relies too heavily on inward migration and insufficient local justification. (Community group – Otter Valley Association)
- Some residents argue that large-scale development is contradictory to landscape protection and does not address local affordability issues. (Individuals)
- Comments that housing need assessments must include local market evidence, not only district-wide datasets. (Planning consultants)
- Some note practical concerns about whether the plan period is long enough to meet NPPF requirements. (Planning consultants)

#### **Calls For**

- Plan for 100% of housing need, not the 80% transitional figure. (Planning consultants; Landowners/Developers)
- Reassess the housing target to reduce pressure on National Landscape areas. (Community groups – OVA)
- More explicit use of localised evidence, including sales data. (Planning consultants)
- Extend the plan period so it remains compliant with NPPF requirements. (Planning consultants)

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## **HN02 – Affordable Housing**

**Total responses: 24**

#### **Main Issues**

- Many argue the affordable housing percentages (30–35%, 25% Axminster, 40% Marcombe aspiration) lack clear justification and do not reflect viability evidence. (Planning consultants; Landowners/Developers)
- Repeated concerns that the 40% aspiration at Marcombe is unrealistic without public subsidy. (Planning consultants; Individuals)
- Housing associations highlight issues with perpetuity requirements, pepper-potting and unclear clustering expectations. (Public body – South West Housing Association Planning Consortium)
- Developers argue the evidence base does not justify area-based percentage differences across the district. (Landowners/Developers)
- Community groups argue the % is too low and should be higher, given identified need of 11,000+ affordable homes. (Community groups – OVA)
- Concerns about a lack of whole-plan viability testing. (HBF)

#### **Calls For**

- Provide robust viability evidence supporting each % requirement and area-based differences. (Planning consultants; Landowners/Developers)
- Reword Marcombe requirement to specify a minimum viable percentage with subsidy used only to uplift. (Planning consultants)

- Retain or increase affordable housing levels in high-value coastal towns. (Community groups – OVA)
- Clarify clustering expectations and define “small clusters”. (Public body – SWHAPC)
- Allow flexibility in tenure mix based on market evidence. (Planning consultants)

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

**Total responses: 12**

#### **Main Issues**

- Large number of developers argue that the requirement for 10% specialist older persons housing on sites of 200+ homes is too rigid and not evidence-based. (Planning consultants; Landowners/Developers)
- Repeated concern that many sites are not suitable for older person accommodation due to access, topography, or distance to services. (Planning consultants; Landowners/Developers)
- Viability concerns raised due to additional design obligations and specialist needs. (Planning consultants; HBF)
- Lack of clarity on what constitutes “specialist older person dwellings”. (Planning consultants)
- Community groups support the principle but request more small homes generally. (Community groups – OVA)

#### **Calls For**

- Require older persons housing only where evidence of need, market demand, and viability is demonstrated. (Planning consultants; Landowners/Developers)
- Allow targeted allocations for older persons housing rather than a blanket site-wide rule. (Planning consultants)
- Clarify definition of “specialist older persons accommodation”. (Planning consultants)
- Ensure locational criteria (400m to shops, transport, level access) are realistically achievable. (Individuals)

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

**Total responses: 19**

#### **Main Issues**

- Widespread concern that 50% M4(2) requirement is too high and not justified by the evidence base (which some say indicates ~17% need). (Planning consultants; Landowners/Developers)
- Strong objections to increasing M4(3) affordable housing requirement from 5% to 15%; significant viability implications. (Planning consultants; Landowners/Developers; HBF)

- Topography, parking requirements, and lift implications make M4 standards difficult on many sites. (Planning consultants)
- Housing associations support engagement but raise concerns about cost and feasibility. (Public body – SWHAPC)
- Some note that Government intends to mandate M4(2) nationally, reducing the need for local policy repetition. (Public body – DCC; HBF)

#### **Calls For**

- Reduce M4(2) requirement to 20–30%. (Planning consultants; Landowners/Developers)
- Reduce M4(3) requirement or make it strictly evidence-based. (Planning consultants; HBF)
- Add policy flexibility where technical or viability constraints arise. (Planning consultants)
- Exclude flats, 1-bed units and self-build/custom-build plots. (Planning consultants)

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

**Total responses: 17**

#### **Main Issues**

- Very strong and consistent concern that the 5% requirement on all sites of 20+ homes is unjustified and will harm deliverability. (Planning consultants; Landowners/Developers; HBF)
- Issues highlighted around construction sequencing, health & safety, and leaving unsold plots vacant. (Planning consultants; HBF)
- Many argue demand is too variable and better delivered on dedicated self-build sites, not part of larger schemes. (Planning consultants; Landowners/Developers)
- Concerns about marketing period (24 months), unsold plots, and requiring affordable self-build on 250+ schemes. (Landowners/Developers)
- Housing associations warn that requiring self-build plots on 100% affordable schemes makes them undeliverable. (Public body – SWHAPC)

#### **Calls For**

- Remove or revise the 5% requirement; use evidence-led demand triggers instead. (Planning consultants; HBF)
- Reduce marketing period to 6–12 months. (HBF; Developers)
- Exempt 100% affordable schemes and schemes where no demonstrable demand exists. (Public body – SWHAPC)
- Prefer allocation of specific self-build sites, not blanket requirements. (Planning consultants; Landowners/Developers)

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

**Total responses: 2**

### **Main Issues**

- Concern that assumptions about single people being housed in shared accommodation are inappropriate and not inclusive. (Individuals)
- Comments that overly strict controls on replacement/subdivision sizes may inhibit investment in older rural properties. (Individuals)

### **Calls For**

- Provide options such as flatlets, soundproofed medium-rise, and more flexible models to support neurodivergent/introverted residents. (Individuals)
- Allow replacement/subdivided dwellings to exceed size limits where justified. (Individuals)

---

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

**Total responses: 1**

### **Main Issues**

- Only one representation: Historic England supports the policy. (Public body – Historic England)

### **Calls For**

- None (all supportive).

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

**Total responses: 0**

- No responses were received for this policy.

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## **HN09 – Gypsy and Traveller Sites**

**Total responses: 2**

### **Main Issues**

- Respondents raise no objections to Policy HN09, agreeing that East Devon District Council can meet the identified needs of Gypsies, Travellers and Travelling Showpeople within its own district boundary. (Public body – Somerset Council; Public body – Dorset Council; Public body – Devon County Council))
- It is confirmed that there are no unresolved cross-boundary issues associated with Gypsy, Traveller and Travelling Showpeople provision under the approach set out in the Plan. (Public body – Dorset Council; Public body – Devon County Council)

### **Calls For**

- Continue engagement under the Duty to Cooperate, particularly as Somerset Council’s Gypsy and Traveller Accommodation Needs Assessment is expected to be completed in early 2026. (Public body – Somerset Council)
- Retain the current joint-working approach with neighbouring authorities on Gypsy, Traveller and Travelling Showpeople provision, as described in the Plan. (Public body – Dorset Council; Public body – Devon County Council)

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## **HN10 – Rural Housing Exception Sites**

**Total responses: 0**

- No responses were received for this policy.

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## **HN11 – Housing for Rural Workers**

**Total responses: 1**

### **Main Issues**

- Strong objections to the 150m<sup>2</sup> size cap, considered unjustified and too restrictive for family farms, multigenerational living, apprentices, and operational needs. (Planning consultants – Acorus; Individuals)
- Concern that it undermines design quality and functionality. (Planning consultants)

### **Calls For**

- Replace 150m<sup>2</sup> cap with wording allowing size commensurate with needs of the holding. (Planning consultants)
- Allow larger replacements/extensions where justified and appropriate to setting. (Individuals)

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

**Total responses: 3**

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

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 9**

#### **Main Issues**

- Developers and landowners argue the policy is overly restrictive, as it limits growth strictly to existing operational boundaries and prevents expansion of successful rural businesses. (Landowner/Developers)

- Policy is said to conflict with NPPF paragraphs 85–86, which require flexible, responsive economic growth policies. (Planning consultants)
- Calls that the policy is unclear about what “socially and environmentally acceptable” means and lacks environmental safeguards. (Public body – Blackdown Hills National Landscape)
- Environmental bodies say the policy should require biodiversity enhancement, not just avoidance of harm. (Public body – Devon Wildlife Trust)
- Environment Agency supports the drainage requirements but requests clarity and reference to SSAFO regulations. (Public body – Environment Agency)
- Heritage impacts of new agricultural buildings need stronger policy wording. (Public body – Historic England)
- Individuals question whether EDDC has the resources to monitor compliance. (Individuals)
- Community groups suggest the policy should require carbon-reducing technologies and water efficiency in new agricultural buildings. (Community groups – Otter Valley Association)

#### **Calls For**

- Allow expansion “within or adjacent to” operational boundaries where economic need is demonstrated. (Landowner/Developers)
- Add specific wording requiring biodiversity enhancement, not just neutrality. (Public body – Devon Wildlife Trust)
- Add heritage references to clause A to protect historic farmsteads. (Public body – Historic England)
- Clarify expectations for “environmental acceptability” or mirror SE01 wording on amenity impacts. (Public body – Blackdown Hills National Landscape)
- Require carbon-reducing technologies and water-efficiency measures. (Community groups – Otter Valley Association)
- Clarify drainage wording and reference SSAFO regulations. (Public body – Environment Agency)

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### **SE03 – Farm diversification**

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 2**

#### **Main Issues**

- Concern that a rigid approach to preventing loss of hotels/B&Bs is unrealistic, given structural decline in small hospitality businesses and competition from short-term lets. (Community groups – Sid Vale Association)
- Fear that the policy will create vacant buildings and stagnation within conservation areas if change of use is effectively prohibited. (Community groups – Sid Vale Association)

**Calls For**

- Introduce a viability test and/or marketing period to justify loss of tourist accommodation. (Community groups – Sid Vale Association)
- Support change of use to residential where continued hotel/B&B use is unsustainable. (Community groups – Sid Vale Association)

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**SE05 – Employment and Skills Statements**

**Total responses: 4**

**Main Issues**

- Some residents doubt the practicality of requiring developers to deliver local skills/employment benefits, arguing large national contractors typically use established regional workforces. (Individuals)
- Some support the overall social-value aim but say the policy’s requirement to submit statements at application stage is unrealistic for multi-stage/outline schemes. (Landowner/Developers)
- Individuals highlight the need to include support for skills in managing SUDS/NBS and common areas. (Individuals)
- Some note updated guidance now exists on what statements must contain. (Planning consultants)

**Calls For**

- Allow the Employment & Skills Statement to be secured by condition, submitted prior to commencement when construction value is known. (Landowner/Developers)
- Include support for training connected to site maintenance, SUDS and nature-based solutions. (Individuals)

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**SE06 – Town centre hierarchy**

**Total responses: 1**

**Main Issues**

- The retail hierarchy is placed in supporting text rather than the policy; this causes confusion. (Planning consultants)

- Text does not fully reflect NPPF support for diversification and broader town centre uses beyond retail. (Planning consultants)
- Sequential test elements duplicate SE07. (Planning consultants)

#### **Calls For**

- Move the hierarchy from paragraph 9.32 into the policy itself. (Planning consultants)
- Update text to reflect NPPF paragraphs 90(a)–(b) and the need for diversified town centres. (Planning consultants)
- Delete duplicated sequential-test wording already covered in SE07. (Planning consultants)

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

**Total responses: 3**

#### **Main Issues**

- Strong objection from Co-op that the Primary Shopping Area (PSA) and Town Centre Area (TCA) for Axminster are inaccurately drawn, including large areas of predominantly residential streets. (Planning consultants)
- Current PSA/TCA does not reflect where retail is actually concentrated, conflicting with NPPF definitions. (Planning consultants)
- Policy overly restricts town centre uses by prioritising only retail/leisure, contrary to NPPF Annex 2. (Planning consultants)
- Restrictions on residential uses within PSAs are inconsistent with NPPF paragraph 90(f) recognising housing as supporting vitality. (Planning consultants)

#### **Calls For**

- Redraw PSA and TCA boundaries to reflect actual concentrations of town centre uses. (Planning consultants)
- Amend second paragraph to support all main town centre uses, not only retail/leisure. (Planning consultants)
- Allow residential at ground floor where appropriate, subject to demand evidence. (Planning consultants)
- Update supporting text (paras 9.37, 9.39) to reflect NPPF support for flexibility and diversification. (Planning consultants)

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

**Total responses: 0**

- No responses were received for this policy.
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## **SE09 – Rural shops outside of towns and villages**

**Total responses: 0**

- No responses were received for this policy.

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## **SE10 – Sustainable tourism**

**Total responses: 4**

### **Main Issues**

- Policy considered overly restrictive, as loss of visitor accommodation is only permitted in “exceptional circumstances”. (Planning consultants)
- Evidence base cited in footnote 85 (marketing/viability guidance) relates only to employment uses, not tourism accommodation. (Planning consultants)
- Policy lacks flexibility to respond where holiday parks are no longer viable or appropriate due to location, facilities or adjoining residential areas. (Planning consultants)
- Reference to “low-cost staff accommodation” as an example of exceptional circumstances lacks evidence and is too narrow. (Planning consultants)
- Individuals request inclusion of rural/heritage crafts in policy support. (Individuals)

### **Calls For**

- Replace “exceptional circumstances” test with requirement to demonstrate no ongoing need for holiday accommodation. (Planning consultants)
- Remove reference to low-cost staff accommodation. (Planning consultants)
- Produce updated viability/marketing guidance specific to tourism uses. (Planning consultants)
- Add support for rural/heritage crafts. (Individuals)

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

**Total responses: 0**

- No responses were received for this policy.

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## **10. High Quality Design**

**Total responses: 25**

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

**Total responses: 10**

#### **Main Issues**

- Desire for stronger recognition of traditional vernacular architecture as a core design approach. (Individuals)

- Concerns about requiring NDSS for all homes without clear evidence of need or viability. (Planning consultants)
- Objection to treating SPDs as Local Plan policy. (HBF)
- Worry that national developers produce generic, non-distinctive house types. (Individuals)
- Welcome for new text on appropriate lighting in sensitive landscapes. (Individuals; Public body – Historic England)
- Concern that references to National Landscape design guidance have been lost. (Public body – Blackdown Hills NL)

#### **Calls For**

- Embed and prioritise traditional vernacular design in policy and design codes. (Community groups)
- Re-examine justification for NDSS and apply only where evidence supports it. (Planning consultants)
- Remove SPD references from policy text. (HBF)
- Reinstate reference to National Landscape-specific guidance. (Public body – Blackdown Hills NL)

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

**Total responses: 8**

#### **Main Issues**

- Objections to replacing “optimise” with “maximise density”, citing conflict with NPPF and risk of overdevelopment. (Historic England, Individuals)
- Widespread opposition to requiring design codes for 50+ dwellings, considered disproportionate. (Developers)
- Objection to requiring design codes for all sites in or adjacent to National Landscapes, including small schemes. (Planning consultants)
- Calls for clarity on overlap between this policy's design code requirement and SD01 masterplanning. (Planning consultants – Boyer)
- Community objection to development in National Landscapes, calling it inconsistent with national protections. (Individuals)

#### **Calls For**

- Revert to “optimise density” wording. (Historic England, Individuals)
- Raise design code threshold to 500 dwellings. (Developers)
- Alternatively, reduce threshold to 35 dwellings to improve design quality in smaller schemes. (Individuals)
- Remove the National Landscape-wide design code requirement. (Planning consultants)

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## **DS03 – Display of advertisements**

**Total responses: 1**

**Main Issues**

- Support for tighter control of visually intrusive adverts, especially in places like Seaton. (Individuals)

**Calls For**

- None (supportive representation only)
- 

**DS04 – Green and blue Infrastructure**

**Total responses: 2**

**Main Issues**

- Need for clarity on how the plan will apply the full Natural England GI Framework Standards (e.g., Urban Greening Factor, Accessible Greenspace Standards). (Public body – Natural England)
- Policy references only 5 GI principles, whereas the Framework includes 15. (Public body – Natural England)
- Lack of clarity around interaction with mandatory Biodiversity Net Gain, especially stacking. (HBF)

**Calls For**

- Specify how GI Standards (e.g., UGF benchmarks) will be applied locally. (Public body – Natural England)
  - Clarify policy relationship with BNG requirements. (HBF)
  - Include clear reference to all 15 GI principles. (Public body – Natural England)
- 

**11. Sustainable Transport and Communications**

**Total responses: 1**

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

**Total responses: 1**

**Main Issues**

- Worry that proposed new roundabout and crossings for Exmo\_17 would slow traffic, worsen air pollution on the main busy road to Exmouth. (Individuals)

**Calls For**

- None specific to policy wording (site-specific objection).
- 

**TR02 – Protecting transport sites and routes**

**Total responses: 11**

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### **Main Issues**

- Support for Sidford–Sidbury strategic cycle network, noting allocation SIDM\_06a could help deliver it. (Landowners/Developers – Sidbury Manor Estate)
- Objection to requiring developers to consider transport impacts from uncommitted future developments; requests alignment with national policy (committed development only). (Planning consultants)
- Strong objection to safeguarding the Axminster relief road route, citing no evidence of funding or deliverability. (Landowners/Developers – Persimmon/WainHomes)
- Network Rail states railway role is under-represented; policy lacks reference to station upgrades, improvements to level crossings, Exmouth branch redoubling, service increases, and wider rail improvement priorities. (Public body – Network Rail)
- Support policy but it should reflect any further transport sites and routes identified through ongoing work on the GE Transport Study or the IDP. (Public body – National Highways)
- Suggestion that future rail links to Exeter Airport, Marcombe town centre and Skypark should be planned. (Individuals)
- Minor typographical and formatting errors identified. (Community groups – Sidmouth Cycling Campaign)

### **Calls For**

- Amend policy wording to refer to committed development only. (Planning consultants)
- Remove safeguarding of Axminster relief road due to lack of evidence of deliverability. (Developers – Persimmon/WainHomes)
- Add policy text on rail upgrades: passing loops, redoubling, platform works, station improvements, and level crossings. (Public body – Network Rail)
- Correct typographical errors (e.g., separate “Cranbrook to Exeter (E3)” and “Otter Trail”). (Community groups – Sidmouth Cycling Campaign)
- Consider long-term planning for potential light rail links to major growth areas. (Individuals)

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

**Total responses: 4**

### **Main Issues**

- Policy presumes that all developments must secure new sustainable transport arrangements, whereas existing networks may already be adequate. (Planning consultants)
- Request to reference impacts from committed development only. (Planning consultants)
- Need to consider all-day traffic impacts, not just peaks, consistent with recent case law. (Planning consultants)

- National Highways welcomes strengthened wording requiring transport mitigation where severe impacts remain. (Public body – National Highways)
- Some landowners/developers offer general support. (Landowners/Developers – Lichfields/Blok)

#### **Calls For**

- Align policy with NPPF/NPPG; treat it as a validation requirement rather than policy. (Planning consultants)
- Add reference to committed development only. (Planning consultants)
- Include consideration of whole-day traffic effects. (Planning consultants)

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## **TR04 – Parking standards**

**Total responses: 16**

#### **Main Issues**

- Widespread objection to EV charging requirements that exceed Building Regulations, especially where justified by Pebblebed Heaths SAC/SPA impacts. (Planning consultants; Developers)
- Concerns policy unfairly requires developers to secure EV uptake among future residents. (Planning consultants; Developers)
- Claims that technical assessments informing EV requirements have not been fully consulted on. (Developers)
- Developers object to blanket requirement of 1.7 spaces per dwelling, seeking site-specific flexibility. (Developers – Vistry)
- Several respondents highlight need for flexibility in counting garages as parking spaces. (Planning consultants)
- Some strongly supportive comments from public bodies on increased EV infrastructure. (Public body – National Highways; DCC)
- Community support for increasing EV provision to reduce reliance on cars near sensitive areas. (Community groups – Otter Valley Association)
- Concern that “should aim to exceed” is vague and unimplementable without a mitigation strategy. (Individuals)

#### **Calls For**

- Align EV charging requirements strictly with Building Regulations and remove higher expectations. (Planning consultants; Developers)
- Remove references requiring developers to promote EV uptake. (Developers)
- Introduce parking flexibility, including garage dimensions. (Planning consultants)
- Remove or revise 1.7 spaces per dwelling average standard. (Developers – Vistry)
- Add clarity on how EV standards will apply relative to new air quality mitigation strategy. (Individuals)

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

**Total responses: 0**

### **Main Issues**

- None.

### **Calls For**

- None.
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## **TR06 – Digital connectivity**

**Total responses: 3**

### **Main Issues**

- Developers argue requirement for superfast broadband provision on all major sites is too rigid, especially in small or isolated communities where viability is uncertain. (Planning consultants – Boyer; Persimmon Homes)
- Need for proportionate assessment of feasibility and cost. (Planning consultants)
- Para 11.28 minor typographical error spotted (“respectfully” instead of “respectively”). (Community groups – Devon Wildlife Trust)

### **Calls For**

- Require engagement with developers to assess feasibility of broadband delivery. (Planning consultants; Developers)
  - Correct typo.
- 

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

**Total responses: 1**

### **Main Issues**

- One representation raised concerns about the adequacy of safeguards around telecommunications infrastructure, including references to potential health effects. As part of this, the respondent cited electromagnetic hypersensitivity, which is not recognised as a medical condition in clinical or regulatory guidance. (Individuals)

### **Calls For**

- A request for clearer guidance on assessment, consultation and siting considerations for telecommunications proposals. (Individuals)
- 

## **12. Our Outstanding Landscape**

**Total responses: 34**

### **OL01: Landscape Features**

**Total responses: 4**

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### **Main Issues**

- General support for inclusion of rivers, waterbodies and watercourses. (Individuals)
- Concern that the policy title and wording do not reflect that it covers landscape character (not only features). (Planning consultants)
- Objection that requiring development to “protect and enhance” all features (e.g., a single tree) is unrealistic; positive landscape change could still occur overall. (Planning consultants)
- Desire for clearer expectations around LVIA requirements. (Public body – Blackdown Hills NL)
- Concern that inclusion of water environment issues appears incomplete or inaccurate in later paragraphs (12.3, 12.5). (Community groups – Lymphstone Water Quality Group)
- Argument that “would not harm” is an absolute test that makes all development impossible and must be qualified. (Landowner/Developers)

### **Calls For**

- Rename the policy to “Landscape Features and Character”. (Planning consultants)
- Reword so not every individual feature must be preserved if there is an overall landscape betterment. (Planning consultants)
- Strengthen LVIA references to align with GLVIA and Landscape Institute guidance. (Public body – Blackdown Hills NL; Devon County Council)
- Qualify the “no harm” test to allow development with mitigation. (Landowner/Developers)

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## **OL02: National Landscapes (AONBs)**

**Total responses: 5**

### **Main Issues**

- Support for reflecting strengthened duties under the Levelling Up and Regeneration Act. (Public body – Natural England)
- Some support for the overall intent but request clearer wording and justification. (Public body – Blackdown Hills NL)
- Too many allocated housing sites fall within NL boundaries, undermining exceptional circumstances tests. (Community groups – Otter Valley Association, Individuals)
- Requests for terminology to align more closely with NL management plans and NPPF definitions. (Public body – Devon County Council)

### **Calls For**

- Amend “setting or appearance” to “natural beauty, special qualities and key characteristics”. (Public body – DCC; Blackdown Hills NL)
- Add footnote linking to NPPF exceptional-circumstances tests. (Public body – Blackdown Hills NL)

- Reassess NL site allocations against OL02 requirements or remove them altogether. (Community groups, Individuals)

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### **OL03: Coastal Preservation Areas**

**Total responses: 2**

#### **Main Issues**

- Developers argue the CPA boundary extensions lack robust justification and rely on desktop mapping, not fieldwork. (Planning consultants)
- Belief that the CPA is being treated as a higher-tier designation than NLs, despite being local only. (Planning consultants)
- Community objections that CPA removal undermines landscape and coastal protection. (Community groups and residents)

#### **Calls For**

- Provide stronger evidence for CPA boundaries or allow site-specific evidence to challenge them. (Planning consultants)
- Reinstate CPA for Exmo\_17. (Individuals)
- Delete the policy entirely (seen as unjustified duplication of NL protections). (Planning consultants)

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

**Total responses: 3**

#### **Main Issues**

- Some developers argue the CPA and view-related elements are unjustified. (Planning consultants)
- Historic England states the text does not adequately protect views contributing to heritage significance despite wording in the supporting text. (Public body – Historic England)
- Requests for improved explanation of how view protection interacts with heritage policy. (Public body – Historic England)

#### **Calls For**

- Update supporting text so it clearly states that views can form part of a heritage asset's setting and significance, and rely on existing heritage policy for protection. (Public body – Historic England)
- Delete the entire policy. (Developers)

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### **OL05: Green Wedges**

**Total responses: 6**

### **Main Issues**

- Multiple representations argue the extent of proposed green wedges is too large and not evidence-based. (Landowners/Developers)
- Claim that Council officers recommended much smaller, more targeted green wedge areas, but Members opted to retain the larger ones without evidence. (Landowners/Developers)
- Objections relating to specific areas:
  - East of Exeter Green Wedge considered unjustified and over-extended.
  - Pinhoe Green Wedge inclusion said to lack merit.
  - Ottery St Mary / West Hill Green Wedge considered excessive and contrary to 2024 evidence. (Planning consultants)
- HBF warns wording may unintentionally restrict off-site BNG or SANGs delivery. (HBF)

### **Calls For**

- Reduce green wedge boundaries to align with February 2024 Council officer assessment. (Developers)
- Remove land north of Sowton village and Pinhoe sites from the designation. (Developers)
- Clarify acceptable development within green wedges (e.g., SuDS ponds, footpaths, BNG). (HBF)

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

**Total responses: 0**

- No responses were received for this policy.

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## **OL07: Contaminated Land**

**Total responses: 1**

### **Main Issues**

- DCC proposes updated wording to ensure development near waste sites includes assessment of landfill gas, leachate and other hazards in consultation with the waste authority. (Public body – DCC)

### **Calls For**

- Amend policy to reference Devon Waste Plan Policy W10 and clarify assessment requirements. (Public body – DCC)

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

**Total responses: 0**

- No responses were received for this policy.

## **OL09: Control of Pollution**

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 5**

### **Main Issues**

- Multiple developers argue the policy is unjustified, duplicates NPPF paragraph 187, and lacks evidence. (Developers, Planning consultants)
- Several representations simply request deletion, stating no changes were made from previous drafts. (Developers)

### **Calls For**

- Delete OL10 entirely. (Developers)
- Or redraft it to replicate NPPF paragraph 187 only. (Developers)

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

**Total responses: 116**

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

**Total responses: 17**

#### **Main Issues**

- Concern that PB01 restates existing Habitat Regulations and adds unnecessary duplication (Planning Consultants, Developers, HBF; Individuals, Community Groups-Otter Valley Association).
- Lack of clarity on mitigation hierarchy wording and inconsistency with para 13.5 (Individuals).
- Absence of Pebblebed Heaths air quality mitigation strategy prevents proper assessment; policy considered interlinked with PB04 (Individuals).
- Concerns that the Water Cycle Study (WCS) is not robust or evidence-led, undermining PB01 and its ability to rule out adverse effects on integrity (Public Bodies - Environment Agency, Natural England).
- Policy lacks clarity on early consideration of mitigation measures and available Natural England advisory services (Devon Wildlife Trust).

#### **Calls For**

- Delete PB01 as unnecessary duplication (Planning Consultants, Developers).
- Clarify and reinstate correct mitigation hierarchy wording (Individuals).

- Provide or await Pebblebed Heaths air quality mitigation strategy before finalising PB01 (Individuals).
- Strengthen WCS evidence and apply precautionary principle (Public Bodies - Natural England, Environment Agency).
- Add reference to Natural England’s Discretionary Advice Service and Pre-Submission Screening (Devon Wildlife Trust).
- Include criteria ensuring proposals do not compromise locally important Red List species (Otter Valley Association).

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

**Total responses: 4**

### **Main Issues**

- WCS considered inadequate, undermining PB02’s ability to ensure no adverse water quality impacts (Public Bodies - Environment Agency; Natural England).
- Policy lacks clarity on interaction with mandatory BNG and wider natural environment policies (HBF).
- Inclusion of Section 41 Habitats (including lowland heathland) triggers need for mitigation hierarchy assessment that has not been undertaken (Individuals).
- Omission of protection criteria for locally important species and ecological linkages (Otter Valley Association).

### **Calls For**

- Update WCS evidence and ensure precautionary approach (Public Bodies - Environment Agency, Natural England).
- Clarify role of PB02 relative to BNG hierarchy and protected species hierarchy (HBF).
- Undertake mitigation hierarchy assessment at plan level before confirming allocations (Individuals).
- Add criteria preventing harm to Red List/BoCC species and key ecological linkages (Otter Valley Association).

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

**Total responses: 15**

### **Main Issues**

- Objections to inclusion of Devon hedges as features equivalent to “important hedgerows” (Planning Consultants).
- Requests to delete “mature trees and hedgerows” from irreplaceable habitats, arguing inadequate justification (Developers).

- Concern that PB03 interacts with Pebblebed Heaths mitigation (via lowland heathland) but strategy absent (Individuals).
- Support for protection of ancient woodland and veteran trees with buffer zones (Natural England).
- Support for inclusion of additional habitats (Individuals).

#### **Calls For**

- Remove Devon hedges from PB03; rely on PB08 for hedge management (Planning Consultants).
- Amend PB03 to simplify and remove mature trees/hedgerows from irreplaceable category (Developers).
- Evidence required for mitigation hierarchy assessment before finalising allocations (Individuals).

Enforce minimum buffer zones of 15m for ancient woodland (Natural England).

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## **PB04 – Habitats Regulations Assessment**

**Total responses: 19**

#### **Main Issues**

- Concerns over absence of Pebblebed Heaths air quality mitigation strategy (Natural England; RSPB; Individuals; Developers).
- Evidence suggests increased vehicle emissions cannot currently be mitigated, preventing HRA conclusion of “no adverse effect on integrity” (Public Bodies - Natural England, RSPB).
- Policy wording around “unacceptable increases” in emissions deemed vague and weak (RSPB).
- Technical Assessment, Mitigation Strategy, viability evidence seen as inconsistent or incomplete (Developers, Planning Consultants).
- Requirement for assessments, monitoring, and financial contributions unclear and burdensome (Developers).
- Nutrient neutrality requirements for River Axe SAC need greater specificity on which development types must comply (Public Bodies - Natural England).
- SE Devon Wildlife Strategy covers only recreation, yet PB04 implies broader mitigation (Lymphstone Water Quality Group).

#### **Calls For**

- Publish and secure full Pebblebed Heaths Air Quality Mitigation Strategy before submission (Natural England; RSPB; Developers).
- Replace "unacceptable increases" with wording tied to "adverse impacts on designated features" (RSPB).

- Update emissions modelling using correct traffic assumptions including revised access arrangements (Individuals).
- Clarify nutrient neutrality wording and specify affected development types (Natural England).
- Remove references to preliminary or untested mitigation measures (Developers)
- Amend PB04 to accurately distinguish recreational mitigation from air/water quality mitigation (Lympstone Water Quality Group).

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## **PB05 – Biodiversity Net Gain**

**Total responses: 33**

### **Main Issues**

- Widespread objection to 20% BNG requirement as unjustified, inconsistent with statutory 10% national minimum, and harmful to viability/delivery. (Landowners/Developers, Planning Consultants)
- PPG and draft NPPF state higher BNG only permissible where site-specific and fully justified; EDDC evidence does not meet this threshold (Multiple respondents).
- Concerns that 20% will reduce affordable housing delivery, undermine viability of major allocations, or constrain urban sites (Landowners/Developers).
- Existing evidence cited (nature assets, designations) not seen as sufficient justification (Landowners/Developers).
- 20% BNG on greenfield sites expected to require extensive land take or off-site credits, which are scarce in East Devon (Landowners/Developers).
- Some support for 20% requirement given East Devon's high ecological value (Natural England).
- Calls for consistent delivery hierarchy differentiation from protected-species mitigation hierarchy (HBF).
- Some representations seek even stronger BNG implementation (Otter Valley Association).

### **Calls For**

- Reduce requirement to statutory 10% (Landowners/Developers).
- Delete PB05 entirely (Landowners/Developers).
- Maintain 20% requirement (Natural England; Otter Valley Association), but with strengthened enforcement and no exemptions.
- Provide full justification, viability testing, and allocation-level evidence before retaining any uplift (Landowners/Developers).
- Clarify hierarchy differences (HBF).
- Update policy to reflect DEFRA changes (sites <0.2ha exempt; SSM metric) (HBF).

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

**Total responses: 5**

### **Main Issues**

- Concern that prioritising all off-site BNG within NRN is inconsistent with national BNG spatial risk multiplier rules. (Landowners/Developers, Planning Consultants)
- Policy wording seen as unclear or ineffective given PB05 already covers BNG. (Landowners/Developers, Planning Consultants)
- LNRS wording around “mitigation in the form of biodiversity improvements” potentially confusing (Natural England).
- Restricting off-site BNG to NRN areas may limit options and undermine feasibility (Developers).

### **Calls For**

- Amend wording to clarify enhancements, not mitigation (Natural England).
- Remove restriction requiring all off-site BNG to be within NRN (HBF; Cherwell Group).
- Delete PB06 entirely (Co-op Group).
- Support noted where LNRS alignment assists specific allocations (Lichfields – Otry\_21).

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

**Total responses: 9**

### **Main Issues**

- Policy considered overly prescriptive and lacking flexibility (Developers).
- Need for clarity on relationship with mandatory BNG (HBF).
- Support for integrated swift brick requirement (Community Group).
- Added wording “or others of equivalent value” seen as too vague (Community Group).
- Some call for mandatory swift boxes across all appropriate developments (Otter Valley Association).

### **Calls For**

- Provide flexibility so enhancements reflect site context (Developer; Bloor Homes).
- Clarify how PB07 interacts with BNG policy (HBF).
- Amend “equivalent value” wording to “...as agreed by the local authority” (Community Group).
- Make swift bricks mandatory in suitable buildings (Otter Valley Association).

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

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**Total responses: 5**

**Main Issues**

- Policy considered overly detailed, duplicative of PB03, and unclear in relation to BNG and tree metrics. (Landowners/Developers)
- Concerns about climate-appropriate native species selection (Otter Valley Association).
- Interaction with emerging NE Urban Canopy Cover Standard requires clarification (Natural England).

**Calls For**

- Simplify PB08 and avoid duplication with PB03 (Developers).
- Clarify relation between tree requirements and BNG calculations (HBF).
- Explicitly reference climate-appropriate native species (Otter Valley Association).
- Integrate Urban Canopy Cover Standard where Council intends to use it (Natural England).

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

**Total responses: 11**

**Main Issues**

- Concerns that annual inspection reports for five years are unjustified and burdensome where land transferred to management companies (Developers).
- Calls to delete PB09 as unnecessary given existing S106 and enforcement routes (Developers).
- Some regret at removal of original financial assurance bond which Natural England considered potentially valuable (Public Bodies - Natural England).

**Calls For**

- Delete PB09 entirely (Developers).
- Remove mandatory annual inspection requirement or apply case-by-case (Developers).
- Consider retaining financial assurance through supplementary guidance, not policy (Natural England).

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

**Total responses: 1**

**Main Issues**

- No issues raised. Representation expresses support for the additional text requiring reference to UNESCO’s Guidance and Toolkit when assessing impacts on the World Heritage Site (Public Body – Historic England).

#### **Calls For**

- No changes requested. Historic England confirms the amendment fully addresses their previous Regulation 19 concern (Public Body – Historic England).

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

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 19**

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

**Total responses: 4**

#### **Main Issues**

- Objection that the policy contains onerous, unjustified and unclear requirements for non-residential schemes and developments over 200/300 homes (Planning Consultants, Developers).
- Concern that the policy assumes all development must consider provision of formal sports facilities (changing rooms, pavilions etc.) even where unsuitable due to location, context or topography (Planning Consultants, Developers).
- Request to avoid gender-specific language (“women and girls”) on grounds of perceived discrimination; preference for inclusive wording (Individual).
- Concern from Sport England that the policy doesn’t fully reflect NPPF para 103 requirements for assessing existing open space before loss or change, and risks failing to ensure replacement provision is of equal or better quantity/quality (Public Body – Sport England).

#### **Calls For**

- Delete OS01 or remove requirements for large-scale schemes and non-residential uses unless justified (Planning Consultants).
- Amend wording to recognise that formal sports provision should be considered on a case-by-case basis, not assumed for all sites (Planning Consultants, Developers).
- Replace gender-specific reference with “safe spaces for all users” (Individual).
- Include clear safeguards ensuring open space or playing fields are not lost without meeting NPPF tests (Public Body).

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

**Total responses: 11**

### **Main Issues**

- Objections that the policy is overly prescriptive, especially additional requirements for developments over 200 and 300 homes, which may be unjustified or unachievable (Planning Consultants, Developers).
- Concerns regarding how distance thresholds, typologies and standards interact with other policy requirements (e.g., SANGs, BNG, GI corridors), leading to potential duplication or double-counting (Planning Consultants, Developers).
- Calls for flexibility where topography or site constraints limit provision (Planning Consultants, Developers).
- Issue raised that OS02 uses a different occupancy rate to WS01, creating inconsistency (Planning Consultants).
- Support for the use of Natural England’s Green Infrastructure Framework and Access to Greenspace Standards (Otter Valley Association).
- Sport England encourage evidence-based provision using the Playing Pitch Strategy rather than standards alone (Public Body – Sport England).

### **Calls For**

- Delete OS02 or delete the additional typology requirements for developments over 200 and 300 homes unless robustly justified (Planning Consultants).
- Allow greater flexibility in how standards are met, recognising physical constraints and multifunctional open space uses (Planning Consultants, Developers).
- Delete all text under “additional requirement for residential developments over 200 dwellings” (Planning Consultants).
- Ensure consistent occupancy rates across policies (Planning Consultants, Developers).
- Complete and rely on Playing Pitch Strategy and Built Sports Facility Strategy to inform evidence (Sport England).
- Retain NE’s Green Infrastructure Framework requirements (Otter Valley Association).

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

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 1**

#### **Main Issues**

- Policy supported; addition of “heritage” to matters for consideration welcomed (Public Body – Historic England).
- No objections to soundness from other respondents.

#### **Calls For**

- None (Historic England consider the amendment resolves previous concern).

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

**Total responses: 21**

### **HE01: Historic Environment**

**Total responses: 6**

#### **Main Issues**

- Requests for stronger support, incentives and guidance for restoring historic areas and traditional features (Individual).
- Objection that parts of the policy do not align with NPPF Chapter 16 (Planning Consultants).
- Concern that identifying non-designated heritage assets through planning applications conflicts with PPG (Planning Consultants).
- Individual concern about balancing historic character with modern design (Individual).
- Support for clarifications on assessing significance (Public Body – Historic England).

#### **Calls For**

- Align HE01 with NPPF Chapter 16 or justify differences (Planning Consultants).

- Amend approach to non-designated assets to limit identification to exceptional cases (Planning Consultants).
- Provide stronger guidance/incentives for restoration (Individual).

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## **HE02: Listed Buildings**

**Total responses: 3**

### **Main Issues**

- Policy wording seen as internally inconsistent: a “no harm” expectation conflicts with later harm-balancing tests (Planning Consultants).
- Objections that the policy should mirror the NPPF (Planning Consultants).
- Support for updates to Part B and para 15.12 (Public Body - Historic England).

### **Calls For**

- Remove the opening “conserve/enhance” section to resolve inconsistency (Planning Consultants).
- Amend or justify wording that differs from NPPF (Planning Consultants).

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## **HE03: Conservation Areas**

**Total responses: 2**

### **Main Issues**

- Requests for streamlined consent processes, specialist contractor directories and stronger support for traditional design (Individual).
- Objection that the policy is not aligned with NPPF (Planning Consultants).
- Support for revisions. (Public Body - Historic England).

### **Calls For**

- Provide clearer processes and support for conservation-led restoration (Individual).
- Align policy with NPPF or justify differences (Planning Consultants).

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

**Total responses: 4**

### **Main Issues**

- Opening sentence seen as requiring absolute protection, conflicting with later balancing tests (Planning Consultants).
- Repeated objection that policy departs from NPPF without justification (Planning Consultants).
- Support for removal of “exceptional cases” wording (Public Body - Historic England).

#### **Calls For**

- Delete the opening sentence to remove inconsistency (Planning Consultants).
- Amend to reflect NPPF terminology or justify departures (Planning Consultants).

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

**Total responses: 3**

#### **Main Issues**

- Support for updates addressing previous concerns (Public Body - Historic England).
- DCC request retention of text ensuring Registered Parks and Gardens are treated as designated assets (Devon County Council).

#### **Calls For**

- Retain removed paragraph on designated historic landscapes (Devon County Council).

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## **16. Community Facilities**

**Total responses: 6**

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

**Total responses: 0**

- No responses were received for this policy.

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

**Total responses: 6**

#### **Main Issues**

- Lack of definition for “community facilities” and unclear policy terminology (Planning Consultants).
- Concern that “community value” is subjective and undefined; risk of inconsistent interpretation (Developers).
- Requests for clearer tests/criteria when assessing loss or replacement of facilities (Planning Consultants).
- Concern that the Marketing Statement requirement (12-month marketing) is noted but detail may be insufficient or inflexible (Developers).
- General support for the policy (Public Body - Theatres Trust).

#### **Calls For**

- Define “community facilities” and reconsult on revised wording (Planning Consultants).

- Add an additional “test” or clearer criteria to assess replacement or loss (Planning Consultants).
- Clarify policy wording, particularly around “community value”, and consider alternative phrasing such as “like for like replacement in terms of size and facilities” (Developers).
- No changes requested by supportive respondent (Public Body - Theatres Trust).

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## **17. Implementation and Monitoring**

**Total responses: 7**

### **Main Issues**

- Suggestion to reference the operational status of Marlcombe SANG due to its scale (Natural England).
- Support for strengthened monitoring of transport strategies, including governance arrangements for the Marlcombe Transport Vision (National Highways; Network Rail).
- Concern that monitoring resources are insufficient to check post-completion landscaping, ecological enhancements and timely delivery of promised infrastructure (Community Group Otter Valley Association).
- Monitoring Framework viewed as lacking clear targets, triggers for action, or explicit mechanisms to address housing under-delivery (HBF).
- Lack of an air quality mitigation strategy for East Devon Heaths SAC/SPA creates uncertainty and potential Duty to Cooperate issues (Individual).

### **Calls For**

- Add reference to Marlcombe SANG in the chapter (Natural England).
- Maintain and develop robust transport monitoring and governance structures (National Highways; Network Rail).
- Increase resources for monitoring ecological enhancements and infrastructure delivery (Otter Valley Association).
- Provide a more detailed Monitoring Framework with clear housing targets, triggers and actions, including early release of reserve/windfall sites (HBF).
- Publish the Pebblebed Heaths air quality mitigation strategy and supporting HRA to inform monitoring and Duty to Cooperate requirements (Individual).

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## **Sustainability Appraisal**

**Total responses: 147**

<b>Respondent</b>	<b>Main issue</b>	<b>Comment summary</b>
McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd	Landscape impact	The housing requirement set by policy SP02 is proposed to be met by a number of sites within National Landscape, as such the accuracy of the overall “score” of minor negative landscape effect is questionable at best. A number of sites are described as requiring considerable landscape mitigation and high quality design as a result of the site’s sensitivity, but that major/significant negative effects remain likely, including: Budl_02 (35 homes), Kilm_9b (23 homes), Kilm_10 (5 homes), Newt_04 (20 homes), Newt_05 (20 homes) and Otto_01 (10 homes). As such, the delivery and capacity of these allocations (equating to 113 homes) is far from certain. Site allocations Exmo_17 (410 homes), Gitti_05 (310 homes), Honi_07 (30 homes), Honi_13 (10 homes), Musb_01a (15 homes), Dunk_05 (43 homes), Ebud_01 (15 homes) and Sidm_34 (43 homes) are all within NL. Of these, Exmo_17 (410 homes) is dependent on an agreed Masterplan to demonstrate how development will be undertaken to conserve and enhance the NL, and the remaining 466 homes will require further detailed assessment to “maximise opportunities to conserve and enhance the National Landscape”. Despite allocation, the deliverability and capacity of these sites is questionable at best in the absence of detailed assessment of landscape impacts.
Natural England	Impact of air quality upon the natural environment	Local Plans are likely to generate increased emissions of nitrogen oxides (NOx) and ammonia, and additional nitrogen deposition as a result of increased traffic generation associated with new development. This should be considered strategically at plan level. Natural England would expect the environmental assessment of the plan including the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) to consider any detrimental impacts on the natural environment from these emissions. It should also suggest appropriate avoidance or mitigation measures where applicable. Technical guidance about the ecological impacts from road transport can also be found in the Natural England research report ‘ <i>The ecological effects of air pollution from road transport: an updated review</i> ’ (NECR199).
Boyer Planning on behalf of Taylor Wimpey UK Ltd	Land at Northcote Hill, Honiton (GH/ED/39a and GH/ED/39b)	Taylor Wimpey disagrees with the SA scoring against the SA objectives, in particular, the assessment of objectives 2,4,5,7,9 for GH/ED/39a and b. Taylor Wimpey has provided additional evidence, including technical reports as part of planning applications for the sites, against each of those objectives and rescored the site accordingly, which demonstrates that GH/ED/39b is capable of accommodating an increased quantum of development (at least 299 homes), and therefore the draft allocation should be increased within the Draft Local Plan.
Boyer Planning on behalf of	Land at St John’s,	3West Developments broadly agrees with most of the scoring against the SA objectives and considers that the appraisal

<b>Respondent</b>	<b>Main issue</b>	<b>Comment summary</b>
3West Developments	Exmouth (Exmo_20)	appropriately recognises the strategic merits of the St John’s allocation. A revised assessment includes minor points of clarification informed by technical surveys and assessments that demonstrate the site can accommodate around 700 dwellings whilst making a positive contribution towards the SA objectives.
Black Box Planning on behalf of Greendale Group (FWS Carter & Sons Ltd) and Crealy Farms	Marlcombe	It is recognised that proportionate SA work would have been undertaken at other earlier stages of Local Plan production. However, on the premise that the First Consultation complied with Regulation 19 by supposedly comprising a plan which the Council intended to submit to the Secretary of State and contained those supporting documents which are relevant, then the Greenhayes comment was evidently a strong criticism that the SA work on such a critical component of the Regulation 19 plan extended to only 15 pages.
Black Box Planning on behalf of Greendale Group (FWS Carter & Sons Ltd) and Crealy Farms	Marlcombe	<p>The Council should identify where the additional 2,000 dwellings and associated land uses may be located. The only logical expansion location for Marlcombe would be at Greenhayes. The Council are using the 80% threshold of the Transitional Arrangements as a target and a supply of deliverable homes, which would meet the stated objectives for strategic development generally and the New Town specifically, is being defied without any rationale.</p> <p>Option 2, and particularly the Greenhayes component of it, has suffered to an extent because of the finite way in which the options have been defined by the October 2022 CBRE report – with Option 1 being focused between the A30 and A3052 corridors, Option 2 being focused on only the A3052 corridor and Option 3 being focused between the A376 and A3052 corridors. For example, Option 1 and Option 2 overlap, so do not represent truly distinct alternatives to each other. Essentially, the Greenhayes promotion suffers by not being included within Option 1.</p> <p>Whilst the Greenhayes promotion is based on self-containment, it does not need to be in lieu of the Council’s objective of delivering a Second New Community. Greenhayes should instead be added to an expanded Marlcombe, given its location can deliver a number of wide ranging significant benefits, extending to early delivery of infrastructure in the form of a ‘ready made’ local centre, enabling of connections to Greendale Business Park, and delivery of the southern extent of the proposed Clyst Valley Regional Park extension.</p>
Black Box Planning on behalf of Greendale Group (FWS Carter &	Marlcombe	Strongly disagree that Option 2 has access to less employment opportunity than Options 1 and 3. The arbitrary 3km distance has clearly been used to create a distinction between the options when one does not exist. Option 2 is in equal proximity to Exeter as Option 1 and 3. Furthermore, Option 2 significantly benefits from

<b>Respondent</b>	<b>Main issue</b>	<b>Comment summary</b>
Sons Ltd) and Crealy Farms		having three major employment sites located within it – in the form of Greendale, Hill Barton and Crealy – enabling more localised commutes to be made by walking and cycling and increasing self-containment. The idea that Option 2 is markedly less attractive for future business occupants is strongly disputed, given the established Greendale Business Park and demand for commercial space on the A3052 corridor and with good access to the strategic road network.
Home Builders Federation	Housing requirement	Unclear if an SA was produced to support the first Reg 19 consultation and what if any changes have been made to it to support the second Reg 19 consultation. We would expect the SA to fully consider and test the implications of meeting the standard method housing figures in full, and the implications of opting for a higher housing figure to support growth, meet unmet need of neighbouring authorities and provide for a range and choice of sites.
LRM Planning on behalf of DWH	Housing requirement	Housing requirement Option A represents the requirement contained within the emerging Local Plan, whilst Option C represents the local housing need figure at the time the 1 <sup>st</sup> Regulation 19 Plan was published. The current and up-to-date local housing need figure (1,156 dwellings per annum) was dismissed as being a reasonable alternative, but the current local housing need figure is clearly a realistic option, particularly as national policy confirms the need to meet objectively assessed development needs, unless the application of the tests in para. 11 of the NPPF suggest that it is unachievable. Such evidence has not been provided, and it would have also provided a strong fit with Objective 3 of the emerging Local Plan. The lack of consideration of such an obvious reasonable alternative strengthens DWH view that the second consultation has been more focused on exploiting the opportunity provided by the transitional arrangements contained within the December 2024 version of the NPPF and less concerned about making a conscious effort to meet local housing needs.
LRM Planning on behalf of DWH	Housing requirement	The SA concludes that Option A is the preferred option but there are a number of technical deficiencies with this approach, namely: incorrect assumption that additional growth above Option A would be directed to a third new community, which ignores smaller sites such as land west of Lilypond Lane, Whimble; Options B and C would result in greater level of housing needs being met, but score the same as Option A in the SA; BNG and NPPF will protect biodiversity and the historic environment to the same extent across all Options; the lower score for Options B and C for SA Objectives 4, 10, 13 assumes that the additional growth will take place in a new town and that new town providing fewer services, but does not consider how the higher levels of development at Options B and C could be dispersed to existing settlements where services and

Respondent	Main issue	Comment summary
		<p>facilities exist; no evidence to justify major negative effect on land resources for Options B and C; the extra benefits from job creation from higher housing figure should mean major positive effect for Options B and C, but a minor negative effect for Option A. The SA does not conclude there is an over-riding infrastructure or environmental capacity constraint that would prevent the full housing need being accommodated.</p> <p>A re-assessment of the Options suggests that revised Option C is preferable.</p>
LRM Planning on behalf of DWH	Stepped trajectory	No SA has been undertaken of the application of the stepped trajectory within Strategic Policy SP02 or the level of the step – this issue has been identified by the Inspectors of the emerging Wiltshire Local Plan (letter dated 22.12.25)
LRM Planning on behalf of DWH	Spatial Strategy – Whimple	Support the spatial strategy in general terms, but Whimple should be given a greater role and be included in Tier 3 as it has a comparable level of services and facilities to Tier 3 settlements. This would lead to positive effects against a range of SA objectives, specifically objectives 2, 4, 5, 6, 8, 9, 10, 11 and 13.
LRM Planning on behalf of DWH	Land west of Lilypond Lane, Whimple	The Sustainability Appraisal does not consider the development potential of land to the west of Lilypond Lane, Whimple. It is assumed that this is because of the conclusions presented within the HELAA that the site is probably unachievable. For the reasons set out above, this is an incorrect conclusion. The reasonable alternative presented by the site has not therefore been considered, which means that the Plan is unjustified. Accordingly, the site should be subject of assessment in future versions of the Sustainability Appraisal.
LRM Planning on behalf of The Cherwell Group	Spatial Strategy	Agree with the SA of the proposed spatial strategy, including the preferred distribution of development, and the allocation of Marlcombe.
Carney Sweeney on behalf of Stuart Partners Ltd	Differences between the SA of the 1 <sup>st</sup> and 2 <sup>nd</sup> Reg. 19 Local Plan	The changes to the SA go beyond what could be described as minor, and include Strategic Policy AR02, significant additions to the Marlcombe SA including masterplan options, updates to baseline information and relevant plans, and archaeological evidence.
S Winn and others	Lack of transparency in the SA update	The revised Sustainability Appraisal is fundamentally different and retrospectively written based on consultation feedback regarding its shortcomings. It cannot be meaningfully reviewed because no Schedule of Changes or tracked changes version has been provided – this prevents stakeholders from making representations in accordance with consultation requirements.
S Winn and others	Land at St John's,	Exmo_20 should be shown as failed site sifting consistent with the HELAA findings of it being unsuitable and unachievable. No

<b>Respondent</b>	<b>Main issue</b>	<b>Comment summary</b>
	Exmouth (Exmo_20) failed site sifting	evidence has been provided to demonstrate that constraints relating to access, mineral safeguarding, or proximity to the Pebblebed Heaths can be resolved.
S Winn and others	Exmo_20 impact on Pebblebed Heaths	Page 390 incorrectly describes the 400m exclusion zones as relating to recreation impacts, whereas the zone is defined by urbanisation effects, demonstrating a misunderstanding of the Habitat Regulations. Exmo_20 is not assessed consistently with Exmo_04
S Winn and others	Exmo_20 incorrect size	Page 392 states Exmo_20 is 85 hectares, but this site is not available meaning the decision to allocate is unsound.
S Winn and others	Exmo_20 Pebblebed Heaths exclusion zone	The SA states that built development will not be permitted within the 400m buffer zone – the Local Plan must accord with this conclusion.
S Winn and others	Inconsistent approach to Exmo_20 and Exmo_04	Page 399 notes that mitigation within 400m of the Pebblebed Heaths is not possible for Exmo_04 or Exmo_20, resulting in the adjustment of Exmo_04 to Exmo_04a. No equivalent adjustment has been applied to Exmo_20 despite identical constraints.
A Humphrey and others	Inconsistent approach to Exmo_20 and other sites at NE Exmouth	The appraisal of Exmo_20 on page 391 does not mention “could lead to some of the greater adverse impacts” which is stated for other sites on the north eastern side of Exmouth (page 390), despite Exmo_20 being the largest site and closest to the Pebblebed Heaths.
A Humphrey and others	Exmo_20 Appropriate Assessment	Exmo_20 was selected for inclusion in the Local Plan prior to the Appropriate Assessment, in conflict with the ‘People over Wind’ CJEU ruling.
A Humphrey and others	Exmo_20 biodiversity impact	Exmo_20 is partly covered by the Strategic Nature Area and draft Nature Recovery Network and is a supporting habitat for S.41 Principle important species ground nesting Nightjar, so should be reassessed.
Not provided	Water Cycle Study	Paragraph 17. Words used are limited levels of pollution. South West Water are one of the worst performing water companies both for wet weather spills and dry weather spills. There are errors in the Water Cycle Study, so we need to delay the Local Plan, and to fully ascertain that any required water infrastructure requirements are scoped, funding identified, with key timelines that align with all developments agreed with SWW.
S Davies on behalf of	Risks to water environment,	The allocation of large amounts of development around the Exe Estuary (Lypstone, Exmouth, and Woodbury) is not sustainable and does not comply with the Habitats Regulations designed to

<b>Respondent</b>	<b>Main issue</b>	<b>Comment summary</b>
Lympstone Water Quality Group	impacts of climate change	protect the Exe Estuary (a European wildlife site/SPA). The HRA is inaccurate as the Exe Estuary only considers recreation impact, not water quality. The SA is inaccurate and does not include up to date information on risks to the water environment, and the impact of climate change (beyond flood risk).