

Report to: Cabinet



Date of Meeting 6 May 2026

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New Towns Programme Consultation Response

Report summary:

This report seeks to summarise the government consultation on the New Towns Programme. The proposals do not include Marlcombe within the shortlisted sites and this is a topic covered extensively in the proposed responses including the weight that seems to have been given to a high level Strategic Environmental Assessment (SEA) that has been carried out for the programme. This report presents brief responses to the questions raised by the consultation on behalf of East Devon District Council for Members to consider for submission as the Council's response to the consultation.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

That Members note the content of the consultation and agree the responses to each consultation question included in this report for submission as the Council's response.

Reason for recommendation:

To ensure that members are aware of the consultation and have the opportunity to comment on the proposals.

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Portfolio(s) (check which apply):

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

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk;

Links to background information <https://www.gov.uk/government/consultations/new-towns-draft-programme>

Link to [Council Plan](#)

Priorities (check which apply)

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

Background

At Cabinet on the 1st April Members received a report setting out proposals for the governance and resourcing of the delivery of Marlcombe. It was noted that Marlcombe had not been selected as one of the seven high priority locations in the governments recently launched consultation. Members showed a commitment to contesting the proposed high priority locations and agreed to receive a further report setting out a response to the consultation. This report seeks to summarise the consultation materials and sets out proposed responses to the consultation questions contained therein.

Introduction

Upon taking office, the government established the New Towns Taskforce to guide the commitment to building new towns. The Taskforce's September 2025 report recommended 12 sites for at least 10,000 homes each, with a focus on infrastructure-first development, strong delivery vehicles, and clear placemaking principles including sustainability and community engagement. An initial government response was published alongside the report. This has now been followed by a fuller government response, including a Strategic Environmental Assessment (SEA) to evaluate environmental impacts. For the SEA, input is sought on local environmental constraints, cumulative effects, and mitigation strategies. Section 2 of the consultation outlines the programme's need, objectives, locations, support, and planning policy. Following consultation and assessments, the government aims to adopt the programme later this year, confirming locations and masterplans.

New Towns Programme

The Case for New Towns

The proposed New Towns programme aims to address England's housing shortages and promote economic growth on the basis that large-scale developments (>10,000 homes) enable efficient land use, integrated infrastructure, and affordable housing not possible on smaller sites and can therefore have good placemaking outcomes through comprehensive planning, funding, and risk management. The government assert that the programme will drive national growth, create sustainable communities, and strategically benefit regions across England.

Programme objectives

The New Towns Programme's main goals are:

- 1. Scale:** Each new town will provide at least 10,000 homes, with potential for expansion.

2. Economic growth: Sites will be chosen to boost national productivity and affordability, supporting areas facing housing shortages, attracting investment, and facilitating transport improvements.

3. Spread: Locations will be distributed geographically throughout England.

4. Deliverability: Projects must demonstrate robust funding, leadership, governance, and infrastructure provision, overcoming barriers to delivery.

5. Placemaking: Developments will align with placemaking principles, offer timely infrastructure, high amenities, inclusiveness, and meet Net Zero standards.

New Town locations

The selection of potential new town locations has been informed by analysis of their environmental impacts. The SEA is being undertaken to assess the likely significant environmental effects of the programme as a whole and of each location, including consideration and assessment of reasonable alternatives.

The SEA Environmental Report provides an assessment of the likely environmental impacts of the programme (including locations and the draft planning policy) against 11 SEA objectives:

- air quality
- biodiversity, flora and fauna
- climate change
- flood risk
- health and wellbeing
- historic environment
- landscape and townscape
- land use, geology and soils
- materials and waste
- population
- water resources

The assessments have been undertaken at programme level, so assumptions informing environmental assessment have been applied broadly across all locations. Once the programme has been adopted, proposals for new town locations will be subject to more detailed, site-level environmental assessment. Appropriate assessment under the Habitats Regulations will be undertaken where required.

Consultees have been invited to review the SEA Environmental Report (ER) and provide feedback on its content, including whether there is any additional relevant environmental information pertaining to the locations, alternatives identified, and mitigations to be considered. No final decisions will be made on either the locations or delivery until completion of the SEA and the conclusion of any necessary Habitats Regulations Assessments.

Assessment of Locations

The SEA process requires government to assess the environmental impacts of the proposed locations and to consider and assess any reasonable alternative ways to achieve the programme objectives. Following the publication of the New Towns Taskforce report in September 2025,

MHCLG has considered the 12 locations recommended by the Taskforce, other locations that were submitted as part of the New Towns Taskforce Call for Evidence, and locations that the Department or Homes England were aware of.

Following this assessment, the government has determined that thirteen locations are capable of meeting the objectives, based on the information available to MHCLG at the point of the assessment. While some of the potential locations appeared initially to meet some of the programme objectives, the locations taken forward as part of the SEA process were those that could demonstrably meet Objective 1 (Scale), Objective 2 (Economic Growth) and Objective 4 (Deliverability). This includes all 12 locations shortlisted by the Taskforce, as well as one additional reasonable alternative which was also identified through further consideration to be capable of meeting these objectives.

The SEA process has assessed the following 12 New Towns Taskforce recommended locations as potential sites for new towns:

- **Adlington, Cheshire East:** Standalone settlement of 14,000–20,000 homes serving Greater Manchester and Cheshire's industries.
- **South Gloucestershire** (Brabazon and West Innovation Arc): Corridor development with up to 40,000 homes in a high-productivity area focused on tech and research.
- **Crews Hill and Chase Park, Enfield:** Expanded development of up to 21,000 homes addressing London's housing needs with landscape-led planning.
- **Heyford Park, Cherwell:** Redevelopment of former airbase for over 13,000 homes, connecting Oxford and supporting clean technology.
- **Leeds, South Bank:** Delivery of ~20,000 homes to boost economic prospects and benefit from £2.1bn local transport funding.
- **Manchester Victoria North:** Inner-city densification for at least 15,000 homes, supporting industry growth and attracting skilled workers.
- **Marlcombe, East Devon:** Standalone settlement of 10,000–14,000 homes bolstering the Exeter & East Devon Enterprise Zone.
- **Milton Keynes:** 'Renewed Town' with ~40,000 homes, revitalizing the city centre, expanding north and east, and improving transport.
- **Plymouth:** Densified development of 10,000–14,000 homes, capitalising on naval investment and evolving the city.
- **Tempsford:** New settlement with over 40,000 homes, leveraging East West Rail for better connectivity in the Oxford-Cambridge corridor.
- **Thamesmead, Greenwich:** Riverside development with up to 15,000 homes and improved transport access via Docklands Light Railway.
- **Wychavon Town (Worcestershire Parkway):** Expansion delivering 10,000–15,000 homes around the train station with sustainable development.

Additionally, the government identified and has assessed:

- **South Barking, East London:** Urban regeneration of multiple sites for over 48,000 new homes to support London's economic growth.

SEA Environmental Report findings

Large-scale housing development has both positive and negative environmental impacts. The SEA Environmental Report, especially its pre-mitigation assessment of proposed new town locations, reflects these typical outcomes. Overall, the New Towns Programme is expected to deliver broad societal benefits and support housing and economic growth, particularly once proper mitigation strategies are implemented.

The report highlights a substantial positive effect on population from the programme due to job creation and economic expansion. However, air quality and health and wellbeing may decline in the short and medium term during construction, but improve over time with sustainability initiatives and new amenities. There is a minor negative impact on climate change, which can be addressed through sustainability measures. While development affects biodiversity, flora, and fauna, statutory requirements for biodiversity net gain will promote nature recovery. Alignment with NPPF ensures protection and opportunities for broader environmental benefits.

Some proposed sites risk significant negative impacts to the historic environment due to heritage assets, though integration and mitigation are possible, supporting placemaking and community identity.

Proposed mitigation and enhancement measures

The report suggests ways to reduce negative effects and enhance positives, such as strengthening placemaking, stakeholder engagement, integrating wider strategies, and setting higher Biodiversity Net Gain targets. Mitigation at local and plan levels will rely on comprehensive masterplanning and design codes, including protecting key natural sites, providing infrastructure, applying design principles, implementing targeted strategies, and engaging early with statutory bodies and communities.

Proposed New Town locations

Based on the SEA reports the government propose to advance seven locations in the New Towns Programme: Tempsford, Crews Hill and Chase Park (Enfield), Leeds South Bank, Manchester Victoria North, Thamesmead (Greenwich), Brabazon and the West Innovation Arc (South Gloucestershire), and Milton Keynes.

The remaining 6 locations are stated to have great potential and will be provided with targeted support to ensure they can progress. The proposals in Plymouth are highlighted as particularly strong due to the opportunity to bolster the UK's defence and security and ensure that housing isn't a barrier to this further growth.

Marlcombe is identified as one of these 'reasonable alternatives' with the consultation stating:

Marlcombe

Marlcombe presents an opportunity to enhance the ambition and improve the quality of a development that, although likely to come forward anyway, will otherwise progress more slowly and with limited capacity to deliver an 'infrastructure first' approach.

As a greenfield site, the impacts on landscape and land use, including light pollution and increased flood risk, would require mitigation.

It is close to Exeter, a growing city that benefits from strong growth along the M5 corridor, but is unlikely to have the same impact on national economic growth compared with other sites".

Government Offer

The government proposes support for new towns through funding, expertise, and policy measures tailored to each location's needs. Funding options may include grants, loans, and equity investment for masterplans, technical studies, business cases, and governance. Funds are intended for land remediation, acquisition, infrastructure, and placemaking. The government will

advise on delivery vehicles and centralise programme governance via the New Towns Unit (NTU). Planning policies and a Place Review Panel will ensure design standards and support delivery.

New Towns Planning Policy

A New Towns Planning Policy seeks to clarify how new town proposals, will be handled— superseding current interim guidance and requiring Environmental Impact Assessments for site developments. If Marlcombe is not one of the formal New Towns then these policies will not apply.

Plan-Making and Decision-Making

Draft policy establishes expectations for masterplanning, infrastructure, and placemaking principles, supporting new towns in plan-making. It emphasises comprehensive town-wide frameworks and design codes, discouraging fragmented development. Social and economic benefits are prioritised, providing grounds for exceptions in Green Belt locations.

Local Housing Need

New town housing must align with local and strategic housing targets. Where Development Corporations manage plans, alternative methods for calculating housing need may apply, ensuring authorities are not disadvantaged.

Land Value

Land value assessments will consider the scale of infrastructure and placemaking required. Land assembly starts with voluntary negotiation but may use compulsory purchase powers if needed. Any increase in land value from planning or infrastructure investments can be reinvested in affordable housing and essential services.

Placemaking

Placemaking is key to the programme, guided by ten principles and a minimum target of 40% affordable housing, half for social rent. Standards will be set during planning, and the government offer includes tools for promoting quality placemaking.

Environmental Impacts

The proposed Planning Policy aims for positive environmental outcomes, advocating low-carbon, climate-resilient communities and enhancing biodiversity. It also promotes efficient density, balanced communities, robust social infrastructure, sustainable transport, and active engagement.

The main consultation questions are set out below with proposed draft responses on behalf of East Devon District Council (Questions 1-6 relate to general details about the respondent and so have not been reproduced here):

Assessment of locations

Question 7

Thinking about the 13 locations listed, which locations do you believe have positive features that could help achieve the objectives of the New Towns programme?

What do you believe are the positive features of the location(s) you have selected?

EDDC response (location selection): EDDC considers that Marlcombe (East Devon) has positive features that strongly support the programme objectives, including the ability to deliver at scale and to do so in an infrastructure-first, place-led way.

- **Scale and deliverability:** capacity for a standalone settlement of c.10,000 homes, and an additional 4,000 homes at Cranbrook all delivered through comprehensive masterplanning rather than piecemeal expansion.
- **Economic growth alignment:** proximity to Exeter and the Exeter and East Devon Enterprise Zone / growth corridor, with potential to support a stronger and more productive local economy and improved affordability.
- **Strategic accessibility:** location between the A30 and A3052, enabling a planned approach to strategic movement and the opportunity to embed high-quality public transport and active travel networks from the outset.
- **Placemaking opportunity:** ability to set a town-wide framework for community infrastructure, town/district centres, open space and green-blue infrastructure early, supporting self-containment and healthy living.
- **Capacity for mitigation-by-design:** the masterplan-led approach allows environmental effects to be avoided and mitigated through the structure of development (buffers, green-blue networks, and careful access/location decisions).

Marlcombe is at an advanced stage of planning through inclusion in a Reg 19 draft Local Plan to be submitted for an examination later this year and with discussions on-going with landholders and developers to commence development in 2030. When considered with the Cranbrook expansion areas which also form part of the proposal, this is a unique opportunity to deliver a significant uplift in homes in this parliament that the other proposals cannot achieve.

Question 8

Do you think any of the 13 locations listed face barriers which could hold back delivery of the New Towns Programme objectives?

(Yes/No/Not sure)

If you answered yes, please tell us what you believe the barriers to delivery in the location(s) you have selected are.

EDDC response: Yes — EDDC considers that all locations face barriers that could hold back programme objectives unless they are addressed through early, coordinated intervention.

- **Infrastructure funding and sequencing:** the viability and pace of delivery is strongly dependent on upfront investment in strategic transport, utilities, education/health and green/blue infrastructure.
- **Land assembly and value capture:** without tools to assemble land early and capture uplift, delivery risks becoming fragmented, slower, and less able to fund the infrastructure and affordable housing required.
- **Environmental constraints:** greenfield locations can have significant impacts on biodiversity, landscape and heritage assets unless there is strong and enforceable mitigation-by-design, evidence-led buffers, and long-term management arrangements.
- **Cross-boundary infrastructure dependencies:** strategic transport and service provision can involve multiple agencies and geographies, requiring clear governance and joint delivery mechanisms.

- **Capacity and capability:** local authorities require sustained skills and resources (planning, delivery, commercial, legal, programme management) to design and implement complex, long-term programmes.

EDDC is in a unique position of already having a clear ask of government to support infrastructure funding and timely delivery including bolstering capacity and governance arrangements that would introduce an interim delivery vehicle and a transition through to a locally led development corporation. We have strong relationships with land holders and current opportunities for land assembly and value capture to help deliver programme objectives. There is an established masterplan and evidence base for Marlcombe which addresses and mitigates environmental constraints. We are working closely with multiple agencies to unlock cross boundary infrastructure issues such as transport and water infrastructure needs.

Question 9

Do you think the SEA report has identified the main environmental issues relevant to the 13 locations?

(Yes/No/Not sure)

If you answered no, please expand here.

EDDC response: Yes, broadly — EDDC considers that the SEA identifies the main categories of likely effects and constraints relevant at programme level (including biodiversity, landscape, historic environment, air quality, water resources and flood risk). However, as the SEA itself recognises, outcomes depend heavily on location-specific masterplanning, avoidance and mitigation, and the delivery model.

The report however looks at a broad location that far exceeds the area shown in the New Towns Taskforce report. It is also far larger than the area shown as an allocation in the Draft East Devon Local Plan 2020-2042. This has significantly impacted the assessment drawing in additional environmental constraints and issues that need not have been considered and would not be impacted as suggested in the assessment.

Question 10

Is there any additional environmental information about these locations that the SEA should take into account?

(Yes/No/Not sure)

If you answered yes, please tell us what additional information the SEA should take into account

EDDC response: Yes —EDDC recommends that the SEA and subsequent due-diligence work draw on the most recent local evidence prepared through plan-making and masterplanning, particularly for locations with an advanced evidence base (such as Marlcombe).

- **Masterplan option testing:** comparative appraisal of alternative access strategies, settlement structure, green-blue networks and phasing, to demonstrate how significant effects can be avoided rather than only mitigated.
- **Locally-derived constraints and opportunity mapping:** up-to-date habitat and ecological networks, heritage setting sensitivity, and landscape sensitivity studies where undertaken.

- **Water resources and wastewater capacity evidence:** including water cycle and drainage strategies where available.
- **Strategic transport evidence:** including modelling outputs, mitigation concepts and public transport strategies, given the relationship between transport, air quality, carbon and health outcomes.
- **Long-term stewardship proposals:** where emerging, evidence about governance for green infrastructure, habitat management, and community assets (because delivery and monitoring depend on it).

The scope of the work means that the SEA has sought to consider each site based on a common level of information however the proposals for Marlcombe are far more advanced than many, if not all, of the other proposals. This is particularly highlighted in the mitigations identified in the SEA which are high level and uncertain whereas in the case of Marlcombe these mitigations are in most cases fully understood and have been designed into our masterplan. As a result, we can give a much greater level of assurance that these issues can be adequately mitigated than the SEA indicates. As a result, the site would score much higher in any SEA that takes account of the full information that is available.

Aside from this there are inaccuracies in the information considered in the SEA in relation to Marlcombe. The SEA:

- assumes a much higher build out rate than is planned
- assumes that agricultural land grading is not available when this information is available for most of the site (see post-1988 Agricultural Land Classification).
- overestimates the extent of flood zone areas due to the consideration being based on a broad location rather than the actual proposed site
- Includes comments about a loss of existing employment land and a loss of identity of Cranbrook which are simply not true.

We therefore raise significant concerns about the accuracy of the information used, the assessment and the conclusions reached.

Question 11

Do you have any suggestions for practical mitigation measures to address effects identified in the SEA report?

(Yes/No/Not sure)

If you answered yes, please set out the practical mitigation measures here.

EDDC response: Yes — EDDC supports mitigation that is embedded into the delivery model (requirements, funding and governance), and not left solely to later project-stage negotiation.

- **Avoidance-led masterplanning:** require an early constraints-and-opportunities plan and demonstrate avoidance of the most sensitive habitats, heritage settings and landscape receptors before moving to mitigation.
- **Green-blue infrastructure first:** secure the green-blue network early (including multifunctional open space, SuDS corridors and buffers), with clear standards for width, connectivity and long-term management.
- **Enhanced BNG ambition:** use higher BNG targets than the statutory minimum where necessary to address location-specific risks and to secure strategic-scale nature recovery; specify delivery rules (on-site priority, additionality, and governance).

- **Transport decarbonisation package:** commit to early high-quality public transport, bus priority where needed, active travel networks, demand management and a phasing strategy that avoids car-dependent early occupations.
- **Construction controls:** require robust construction environmental management (air quality, noise, dust, water quality and waste) and monitoring, with clear enforcement mechanisms.
- **Water efficiency and resilience:** set ambitious water efficiency standards, integrated drainage strategies, and measures to address flood risk and climate resilience.
- **Long-term monitoring and adaptive management:** define indicators, responsibilities and funding for monitoring, with triggers for corrective action if outcomes are not being achieved.

These mitigation measures are all built into the policy framework for Marlcombe as set out in the East Devon Local Plan 2020 – 2042 and associated evidence in the form of the masterplan and transport vision statements for Marlcombe which set out specific mitigations to address these issues and show how they will be delivered.

Question 12

Do you have any other feedback on the SEA report, including the issues and effects identified therein?

EDDC response: EDDC understands the need for the SEA's programme-level approach and its recognition of uncertainty at this stage. However, EDDC emphasises that programme-level 'pre-mitigation' significant adverse findings should not be interpreted as fixed outcomes for locations that are being progressed through comprehensive masterplanning. The programme should therefore place strong weight on: (i) the quality of the delivery vehicle, (ii) enforceable infrastructure-first phasing, and (iii) the demonstrable ability to avoid impacts through design choices, not only mitigate them. The advanced stage of work on Marlcombe should give the government assurance that environmental impacts can be mitigated, however unfortunately the additional work that has been undertaken for Marlcombe has not been taken into account. This has made the assessment inaccurate and skewed the assessment of Marlcombe as an option.

The SEA of Marlcombe states that approximately 17% of the broad location is within Flood Zone 2 and 13% is in Flood Zone 3, resulting in a significant negative effect. However, as noted above, the broad location for Marlcombe is far larger than the area shown in the New Towns Taskforce report (and significantly larger than the Draft Local Plan allocation). This larger area contains land with flood risk, which is important because increased flood risk is cited as a reason for rejecting Marlcombe (SEA report, table 2-2). There may be other negative effects that are incorrectly highlighted as a result of the broad location being too large. Therefore, the SEA report should be updated to assess the correct broad location as shown in the New Towns Taskforce report.

Proposed New Town locations

Question 13

Do you think the 7 locations proposed for the new towns programme are the ones most likely to meet the programme's objectives?

(Yes/No/Not sure)

If no, please set out why you think the proposed locations do not meet our objectives.

EDDC is concerned that excluding Marlcombe from the main programme risks underutilising a place that has strong potential to deliver (i) a large quantum of homes, (ii) an infrastructure-first

approach, and (iii) economic growth aligned to a functional economic area, with a well-established local plan and masterplanning evidence base. The programme should retain locations where the evidence demonstrates they can meet objectives—particularly on deliverability and placemaking—and where timely government intervention could materially improve outcomes and pace of delivery. Many of the selected 7 locations cannot provide the same level of assurance that Marlcombe can in this regard.

There is also considered to be significant detriment to the success of the programme and its credibility through the inclusion of a number of proposals which do not meet any reasonable definition of a 'new town' and are in fact urban regeneration or urban extension sites. Marlcombe is accepted as a credible and deliverable proposal and one of few that is a genuine standalone new town in accordance with the original intentions of the programme and so should have been prioritised.

Government offer

Question 14

Do you agree with the overall government offer for proposed new town locations?

(Yes/No/Not sure)

If you answered no, is there any additional support you think should be offered?

EDDC response: Yes, in principle — EDDC supports a package combining funding, expertise, policy support and delivery capability. However, for the offer to be effective it should be clearer, earlier, and more certain—particularly for locations that are not in the initial 'priority 7' but could be accelerated to deliver an infrastructure-first outcome.

- **Upfront infrastructure funding:** a clear route to early capital (grants/loans/equity) for strategic transport, utilities, education and health infrastructure, aligned to an agreed phasing plan.
- **Capacity support:** multi-year funding for local authority programme capacity (planning, delivery, commercial, legal, procurement and community engagement) to avoid reliance on short-term bids.
- **Land assembly and value capture tools:** stronger and clearer mechanisms to acquire and assemble land early and capture uplift for reinvestment in infrastructure and affordable housing.
- **Clarity on delivery vehicles:** guidance and support to establish the most appropriate delivery vehicle (including development corporation options) with governance that secures public interest and long-term stewardship.
- **Support for 'next wave' locations:** a published pathway (criteria, timetable, support package) for locations not in the initial priority set, so that investment and capacity are not lost.

Clarity is however urgently needed not just on these broad types of support but the actual offer for each location.

Question 15

Do you think there are any additional interventions that government should consider to ensure design and placemaking quality in new towns?

(Yes/No/Not sure)

If you answered yes, please set out the additional interventions government should consider.

EDDC response: Yes — EDDC supports additional interventions to make high-quality placemaking more consistent across locations.

- **Quality gates linked to funding:** make access to government funding conditional on meeting clear quality and infrastructure-first milestones (e.g., town-wide framework and phasing plan adopted; design code in place; stewardship plan agreed).
- **Mandatory independent design review:** require design review at key stages (vision/masterplan, code, major reserved matters), with published recommendations and a clear 'response to review' process.
- **Town-wide design coding expectation:** require a comprehensive design code and pattern book covering movement, public realm, typologies, green-blue infrastructure, and climate resilience, tailored to local character.
- **Stewardship and management standards:** require early establishment of stewardship arrangements for green infrastructure and community assets, with long-term funding mechanisms.
- **Clear expectations for social infrastructure:** require an agreed 'infrastructure and services schedule' (education, health, community, sport) with delivery triggers tied to occupations.

New Towns planning policy

Question 16

How clear do you find the proposed planning policy?

If you answered unclear, which elements are unclear and how would you suggest changing them?

EDDC response: Mostly clear — the intent and direction of travel is clear, particularly the emphasis on comprehensive masterplanning, infrastructure-first delivery and high-quality placemaking. To aid implementation, EDDC suggests additional clarity in the following areas.

- **Status and relationship to local plans:** confirm how the policy will apply where a local plan is at an advanced stage and already allocates a new community (including transitional arrangements).
- **Decision-making expectations:** clarify how the policy interacts with existing national policy tests, including how 'substantial weight' should be evidenced and balanced at plan and application stages.
- **Minimum content for town-wide frameworks:** specify what must be included (movement strategy, utilities, education/health, GI network, centres strategy, stewardship, phasing and viability/value capture approach).

Question 17

Do you think establishing the placemaking principles in the proposed planning policy is an effective way to implement the placemaking ambition of the programme?

(Yes/No/Not sure)

If you answered no, how do you think the placemaking principles should be implemented?

EDDC response: Yes — establishing placemaking principles in policy is an effective baseline and provides a shared set of expectations for all parties. EDDC emphasises that the principles should be backed by delivery mechanisms (funding, governance and quality gates) to ensure they translate into outcomes.

Question 18

Do you think the proposed planning policy provides sufficient flexibility to new town locations to meet the placemaking principles?

(Yes/No/Not sure)

If you answered no, what other measures could create a flexible approach to the placemaking principles?

EDDC response: Yes, broadly — provided that flexibility is focused on *how* principles are met rather than *whether* they are met. EDDC supports allowing locations to tailor approaches to character, constraints and delivery models, while maintaining consistent minimum expectations for infrastructure-first phasing, active travel/public transport, green-blue networks, and long-term stewardship.

Question 19

Is establishing a 40% target for affordable housing an effective way of delivering an ambitious number of affordable homes?

(Yes/No/Not sure)

If you answered no, what changes to the target are needed?

EDDC response: No — EDDC supports an ambitious affordable housing target for new towns, including the stated ambition that a significant proportion is social rent, as this is essential to tackling affordability and creating balanced communities. Delivery will, however, depend on land value capture, infrastructure funding and robust phasing so that affordability is not traded off against early viability pressures. These costs will mean that 40% affordable housing will not be viable without significant grant funding. Such grant funding will currently only be provided where it would provide uplift on planning policy requirements. A high policy requirement is therefore likely to limit the ability of sites to access grant and lead to lower levels of affordable housing overall. There is a clear need to either balance the policy requirement to enable access to traditional grant funding or have a separate programme of grant funding for affordable housing in new towns which enables delivery of the 40% target.

Question 20

Is the proposed planning policy on giving substantial weight in decision making to the social and economic benefits of new towns clear?

(Yes/No/Not sure)

If you answered no, please provide your reasons.

EDDC response: Mostly — EDDC agrees in principle, but recommends clarifying how decision-makers should evidence and apply 'substantial weight' in practice (e.g., through identified housing need, affordability metrics, infrastructure provision, jobs/skills outcomes, and long-term fiscal benefits), and how this interacts with avoidance-first environmental policy expectations. It is not clear how the substantial weight to be given to social and economic benefits should be balanced with environmental impacts particularly those impacting on protected species and habitats.

Question 21

Do you agree with the government's approach to decision making policy on the Green Belt?

(Yes/No/Not sure)

If you answered no, what further change to plan-making or decision-making policy are needed?

EDDC response: Not applicable to East Devon's circumstances (no Green Belt within East Devon District).

Question 22

Do you think the proposed planning policy is sufficient for the purposes of safeguarding land for development as new towns.

(Yes/No/Not sure)

If you answered no, how could the policy go further?

EDDC response: No — It is not clear how 'identified New Town areas' should be interpreted. It is strongly recommended that a definition should be included which means that this term refers to all 13 sites identified in the New Towns Taskforce report and considered through the EIA regardless of whether they are taken forward as part of the programme. All of these credible and deliverable New Towns need the protection that the safeguarding provisions provide whether part of the final programme or not. It is only through such protection that you can ensure that the new towns programme as a whole is successful and delivers to its objectives.

Question 23

Do you think any additional planning policies are needed to support the delivery of the programme objectives?

(Yes/No/Not sure)

If you answered yes, please provide details.

EDDC response: Yes — EDDC recommends additional policy detail (or supporting guidance) in a small number of areas to improve deliverability and outcomes:

- **Infrastructure-first phasing policy:** clearer requirements for aligning occupations to the delivery of public transport, schools/health provision and town centre/amenity delivery.
- **Stewardship policy expectation:** requirements for long-term governance and funding of green infrastructure, community assets and public realm.
- **Value capture and viability transparency:** expectations for open-book viability at key stages and a clear approach to capturing uplift for reinvestment in infrastructure and affordable housing.
- **Climate resilience and net zero delivery:** minimum standards for operational carbon, heat decarbonisation, and adaptation (cooling, shading, water stress) embedded in codes and delivery agreements.

Question 24

Do you have any views on the potential impacts of the New Towns Draft Programme on people or groups with protected characteristics?

EDDC response: New towns can have both positive and negative impacts depending on delivery. EDDC considers that, if well-planned, the programme can deliver substantial equalities benefits through:

- **Affordable housing and tenure mix** (including social rent) to address barriers faced by lower-income households and younger people.
- **Accessible environments** (step-free routes, inclusive public realm, accessible public transport) benefitting disabled people and older residents.
- **Access to services** (health, education, community facilities) and local employment, reducing inequalities linked to transport poverty.
- **Safety and inclusion by design** (well-overlooked streets, lighting, inclusive play and recreation).

EDDC also notes the importance of mitigating risks such as: displacement effects on local housing markets, unequal access to early-phase facilities, and digital exclusion in engagement processes. The programme should therefore require inclusive engagement, equalities impact assessment at key stages, and monitoring of distributional outcomes over time.

Final question

Question 25

Is there anything else you would like to tell us that you think is relevant to this consultation but has not been covered in previous questions?

EDDC response: EDDC welcomes the ambition to deliver a new generation of well-designed, infrastructure-first new towns. EDDC asks that the final programme:

- **Retains a clear pathway for additional locations** beyond the initial priority set, where evidence demonstrates strong deliverability and placemaking potential.
- **Recognises the value of advanced plan-making and masterplanning work** already undertaken by local authorities and ensures the programme complements (rather than destabilises) sound local plan processes.
- **Provides certainty on delivery roles and governance** across tiers of local government and infrastructure providers, including education and transport authorities.
- **Focuses on early action** (land assembly, infrastructure funding and quality gates) so that 'infrastructure-first' is achieved in practice and not only in ambition.

EDDC remains keen to work closely with Government, Homes England and partner authorities to progress Marlcombe as a high-quality new community and to support the broader objectives of the programme.

Financial implications:

The report does not raise or request any additional funding requirements at this stage. There are implications but these will come forward in future reports for Cabinet and Council to consider.

Legal implications:

There are no direct legal implications identified within the report. (DH/002545-23/04/2026)