



East Devon Local Plan Consultation Statement (Regulation 22c)



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It is relevant to note that very few objectors to the plan questioned the basic structure and format of the plan. There were adverse comments about its length and complexity and a number of respondents considered there to be contradictory comments in it or for it to be vague or to have 'loopholes'. The bulk of objections were to the plan content/proposals. Few objections questioned the principal of including strategic sites in the plan (though specific sites were the subject of objection).....	46
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1.0 Purpose of Document

- 1.1 This document explains how East Devon District Council has undertaken community consultation and stakeholder involvement to produce the Local Plan (formerly Core Strategy). It explains how ongoing consultation and engagement have shaped the publication version of the Local Plan. It is produced to fulfil requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 and forms the statement defined at Regulation 22 (c) comprising, “a statement setting out:
- which bodies and persons were invited to make representations under regulation 18 (1);
 - how those bodies and persons were invited to make representations under regulation 18;
 - a summary of the main issues raised by those representations;
 - how any representations made pursuant to regulation 18 have been taken into account; and
 - the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations.”
- 1.2 When production of the Local Plan commenced the relevant regulations were those produced in 2004. These were subsequently updated in 2008 and 2009. In April 2012 a new set of Regulations were issued. This means that the specific regulations which refer to production of this Consultation Statement have changed. The Regulations refer to the entire process of preparing Development Plan Documents (DPDs) such as the Local Plan. Work undertaken under previous Regulations is still valid although the specific Regulation (including number) may have changed. Under previous regulations most of the work in preparing the Local Plan/Core Strategy was referred to as Regulation 25. In the 2012 Regulations the equivalent stage is referred to as Regulation 18.
- 1.3 This Consultation Statement forms one of the “proposed submission documents” referred to at Regulation 22 and demonstrates how the Council has met the requirements of the Statement of Community Involvement.
- 1.4 The Council’s **Statement of Community Involvement** (the relevant extract of which appears later in this document for ease of reference) sets out how East Devon District Council should undertake consultations. All consultation responses, from 2008 to the present day, are in the public domain and can be viewed on the Council’s website at www.eastdevon.gov.uk/localplan.

2.0 Overview of consultation undertaken

- 2.1 Production of the Local Plan consists of four main stages:
- (1) Pre-production (evidence gathering).
 - (2) Production (prepare issues and alternative options in consultation; public participation on preferred options; representations on preferred options; preparation of Submission DPD; submission of DPD).
 - (3) Examination (representations on submitted DPD; pre examination meeting; independent examination; binding report).
 - (4) Adoption (adoption; monitoring and review).
- 2.2 Consultation, with bodies specified by legislation and with the public, is undertaken and recorded at each stage in the process.
- 2.3 The District Council has been working on the Local Plan/Core Strategy since 2007 and, in undertaking the first two stages above, has produced a number of consultation documents, including:
- The Statement of Community Involvement Questionnaire in 2007;
 - The Issues and Options Report in 2008;
 - The Core Strategy Preferred Approach in 2010;
 - The Draft Local Plan in 2011;

- The Draft Local Plan Town Proposals in 2012;
- The New East Devon Local Plan Proposed Submission (Publication) in 2012.

2.4 An East Devon Villages Plan is being produced as a separate Development Plan Document.

2.5 Following each consultation stage a report was made to the relevant Council Committee. These reports are available to the public in paper form and can be downloaded from the Councils website¹. They give details of the issues raised, link to the representations in full and explain how the comments made will be/were used to inform the subsequent stages of the Local Plan's production.

3.0 Who have we consulted?

3.1 In line with our commitment to early and meaningful community engagement, extensive public consultation has preceded, and informed, each stage of Local Plan production. Since 2006 the Council has undertaken almost continuous consultation with the communities of East Devon, along with other stakeholders including developers, landowners and infrastructure providers to input into the Local Plan's development. The Councils approach has been to use its **Statement of Community Involvement (SCI)** to guide all engagement activity. The relevant extract of the SCI is provided later in this document.

3.2 We have consulted with everyone on our consultee database, by letter and/or e.mail, which include the specific consultation bodies and general consultation bodies identified in our SCI as well as individual members of the public.

Specific Consultation Bodies
Statutory bodies such as or specifically Natural England, Environment Agency and Highways Agency. Neighbouring Town and Parish Councils and neighbouring County Councils and Local Planning Authorities.
General Consultation Bodies
Groups representing voluntary, racial/ethnic, religious, disability and business interests. Specific groups representing certain interests (nationally and/or locally) for example covering environmental, health, education, transport, leisure, economic development and community need issues, equality groups. Councillors / MP's. Members of the public including residents of East Devon.

3.3 Given the finite resources available, we have targeted consultation to try to reach the maximum number of people, through direct consultation with residents and businesses, and through interest groups and other representative bodies. Early consultation, in particular, invited representatives of literally hundreds of organisations to attend workshops in local towns² so that we could gauge opinion on a range of pertinent issues from the outset.

3.4 East Devon has an above national-average population of articulate, older, white, middle-class residents and interest in local issues, membership of local organisations, is high. It was considered that these residents were 'easy' to reach through direct contact, via leaflets, press releases and the EDDC website. As well as belonging to existing interest groups, these residents were most likely to establish and belong to campaign groups commenting on and often opposing policies of the emerging Local Plan. At different stages of Plan production campaigns were established to resist proposals for development of specific sites- such as St John's Wood in Exmouth, Heathfield Manor

¹ The Development Management Committee minutes are available at:

http://www.eastdevon.gov.uk/development_management_agenda_mins_remit.htm , the Local Plan Panel minutes are available at http://www.eastdevon.gov.uk/local_plan_panel.htm

Where specific reports are relevant, links are provided at the appropriate point in this Consultation Statement

² Contained in the index to East Devon District Council "Core Strategy:outcome of the consultation events" (Spring 2010)

in Honiton, and Knowle at Sidmouth- as well as general opposition to the level of development in the District- such as 'Communities Before Developers'. These campaigns were often well organised, using websites, the press, social media and protest rallies to make their views known. Our Press Officer issued numerous press releases advising the public that the various Local Plan proposals were available for comment but also countering the (sometimes misinformed/misleading) releases of other groups. We have tried to record and address the concerns of these groups, even where they were not directly submitted to us. It is relevant to flag up, as well, that we have received representation supporting development and advocating higher levels of development as well. And there is widespread support for initiatives such as, in principle, greater affordable housing provision. Provision of affordable housing, as demonstrated/established through survey evidence (eg place survey, Corporate Plan consultation) is a key priority of the Council.

- 3.5 Recognising that young people and their families constitute a significant 'hard to reach' group that will be directly affected by planning in the future we focussed considerable resources on seeking their views and including them in the process from the outset. Initial attempts to engage by inviting teachers to workshops/focus groups with other interest groups generated little response so we attended youth clubs and lessons at all colleges in the District, speaking to around 1000 young people who also took forms home for completion by other family members.
- 3.6 Consultation has also been undertaken through the Local Plan Panel (formerly Local Development Framework Panel), which was set up in 2008 to help form the Core Strategy and all other LDF documentation. The Local Plan Panels main function was as an advisory body (not a Council Committee) to provide a steer and opinion on matters that could feature in future planning policy documents and public consultation. It allowed members of the District Council to understand themes, issues and challenges facing the Council in respect of future spatial planning matters and therefore to allow them to reflect on potential policy outcomes and choices. The public were invited to attend meetings of the Panel and to submit written evidence. Council Partners, third parties, experts etc were invited to Panel meetings to make representations and express views. The recommendations of the Panel were reported to the Development Management Committee.

4.0 How have we consulted?

- 4.1 In 2007 an extensive questionnaire consultation was carried out to determine the most appropriate and inclusive methods of communicating with the Public. Feedback suggested that the public (including agents, landowners, organisations and residents) were keen to be involved in the planning process from an early stage and wished to be kept up to date regularly. Favoured communication methods were:
- Letters
 - E.mails (with the comment that more people would use e.mail in the future)
 - EDDC Website
 - Exhibitions
 - Press Releases
 - Through elected Members/Councils
- 4.2 This feedback directly influenced the approach set out in the **Statement of Community Involvement** (SCI) which has since been regularly updated to make it more readily understood and to take account of evolving technology. Initially the Statement of Community Involvement was a lengthy, technically detailed document which was criticised as being difficult for the public to read. In light of this, and to reflect the increasing use of computers in the home as a communication method, the Statement was rewritten in its current table format. Greater emphasis has been placed on electronic communication, including submission of representations by e.mail and online.
- 4.3 The early stages of consultation focussed on identifying the main strategic issues to be addressed through the Local Plan as well as settlement specific issues and aspirations. As well as directly consulting interested parties, considerable effort was put into seeking the views of the Town/Parish Councils and local interest groups and other representative bodies as they were able to comment on particular issues on behalf of their large memberships. Workshop events were held in the towns and these enabled all attendees to discuss their concerns on a variety of issues (eg housing,

transport, employment, environment, community) as well as identifying the broad areas where growth could potentially take place.

- 4.4 As the Plan is forward looking, young people were quickly identified as a group who would be directly affected by future development proposed in the Plan but were under represented and hard to reach, so specific 'face-to-face' engagement was undertaken through visits to youth clubs and through Officer presentations to pupils during lessons. In total, around 1000 young people were able to make their views known and the methodology has since been used as a model of 'best practice' by the Planning Advisory Service.
- 4.5 Less successful has been the attempt to directly engage the groups identified under equalities legislation. Despite attending the Equalities Forum, whose members include representatives of each of the equalities groups, explaining the objectives of the Local Plan and inviting interested parties to be directly involved, few comments were received or issues identified. The work that we did with the Equalities Forum is explained in more detail on page 62. Each consultation has been available in a variety of formats (only a large print version has been requested to date) and no particular equalities issues have been flagged up.
- 4.6 In 2010, in an attempt to further engage using information technology, the Council trialled the use of popular social networking media, including Twitter, Youtube (we made a humorous planning video that whilst not 'going viral' got far more hits than most planning YouTube videos!) and Facebook, but concluded that these had little real benefit and did not generate many responses. These methods were not subsequently incorporated into the SCI.
- 4.7 A new database, Limehouse, was also available with users being able to set up their own passworded accounts to submit their comments whilst reading the document online. This proved popular with agents but was too complicated for many members of the public who wished to submit brief comments quickly. In response to concerns raised, a quick comment form was added to the website so that comments could be instantly submitted with the option of providing contact details if respondents wished to be kept informed. In response to feedback (some users found the database complicated) in 2012 we replaced our database system with a new product that still allows on line comments to be made/and others comments to be viewed but is simpler for people to use and is more tailored to our needs.
- 4.8 By far the most popular means of communication has proved to be e.mail, with letters and telephone calls coming second and third. The updated SCI has been designed around this, with current consultation being displayed prominently on the Council's website, quick comment forms available and e.mail addresses clearly displayed on all consultation material and in press releases.

5.0 Duty to co-operate

- 5.1 The Duty to Co-operate is set out in Section 110 of the Localism Act 2011. The local planning authority must engage 'constructively, actively and on an ongoing basis' during the preparation of local plans when they relate to 'strategic matters'. Strategic matters are defined as development, including infrastructure, with a significant impact on at least two planning areas. East Devon is located in a two-tier area, with Devon County Council providing some public services including education, highways, social services and minerals and waste services whilst the District Council provides others, including planning, environmental health, waste collection, housing and benefits. It borders Exeter City and Teignbridge District to the west, and the City acts as the driver for economic development in the sub-region. Strategic development initiatives are focussed on this relationship and major development schemes in East Devon that have cross-boundary implications include:

- Exeter Science Park,
- The new community at Cranbrook,
- Skypark,
- The Intermodal Freight Terminal,

Infrastructure improvements that in some case cross-boundaries and have cross boundary relevance included:

- Improvement works at Junction 29 of the M5,
- Redhayes Bridge,
- The Clyst Honiton Bypass,
- and the E.On Energy Centre.

5.2 East Devon District Council has produced a draft Statement of Compliance with the Duty to Co-operate which sets out the prescribed bodies that may be relevant to the production of the Local Plan and explains the partnerships we have formed with these bodies to deal with strategic issues.

6.0 Other Considerations

6.1 The Plan has evolved as a result on ongoing consultation but it has also been heavily influenced by other considerations. During production the planning system underwent considerable changes, particularly due to the introduction of the National Planning Policy Framework and the Localism Act and policies were amended to ensure that they were compliant. The Plan text has also been amended in response to sustainability appraisal, habitat regs assessment, Equalities Impact Assessment and other work and research/evidence collection.

Statement of Community Involvement- the section of the SCI which is relevant to Policy work is detailed below (please note that the full SCI also contains details of development management consultation in relation to planning applications and pre-application consultation on major applications) :

Stage in Plan making	Consultation that we will undertake for each stage of Local Plan production
<p>Initial Background Work and Developing the Evidence Base</p> <p>This is the ‘start’ of the process where we gather information and seek to gain an initial understanding of public views</p>	<p>Developing the Evidence base</p> <p>We will gather evidence through some or all of the following:</p> <ul style="list-style-type: none"> • Review of existing data • Use of specialist consultants • Exhibitions and Roadshows • Workshops • Focus groups • Surgeries • Attending Meetings of Other Groups • One-to-One Meetings • Questionnaires • Consultation with Parish Councils and elected Members <ul style="list-style-type: none"> • Any technical or background document that forms or will form a (substantive) part of our evidence base will be available in electronic form on the Council website and in paper form for inspection at the main Council offices. • Details of findings of consultation events that we undertake will be available on our website and in paper format.

Stage in Plan making	Consultation that we will undertake for each stage of Local Plan production
<p>Preparation Stage</p> <p>Consultation is ongoing throughout this stage. The number and type of consultation documents issued at this stage will depend on the issues involved and the revisions required.</p> <p>As a minimum we must notify certain parties (as set out in the statutory regulations) that we are proposing a plan and invite them to comment on what it should contain, When we prepare the plan we must take these comments into account.</p> <p>In addition, we may consider it appropriate to produce one or more draft documents for people to comment on.</p>	<p>We will notify those bodies, groups and individuals that we consider likely to have an interest in the subject of a local plan we propose to prepare and invite representations about what the plan should contain. Any representations will be taken into account when preparing the plan. For each document we prepare we will ensure:</p> <ul style="list-style-type: none"> • Documents are published on the Council website and made available at the main Council Office and public libraries within East Devon; • Paper copies of documents are available during the consultation period. <p>At key stages a sustainability appraisal will be undertaken. This will detail the likely significant environmental, social and economic effects of each proposal or option will be undertaken and made available for public comment. If consultation leads to the approach changing significantly this will be reviewed and re-consulted on.</p>

Stage in Plan making	Consultation that we will undertake for each stage of Local Plan production
<p>Publication</p> <p>This is the stage where we publish the document that we intend to submit to the Secretary of State.</p>	<p>A minimum of six weeks formal public consultation will be undertaken in readiness for plan Examination.</p> <p>The following documents will be made available on the Council’s web site, at the main Council Offices and in the public libraries in East Devon</p> <ul style="list-style-type: none"> • The relevant local plan • A submission policies map (if applicable) • The relevant sustainability report • A representation statement giving details of which bodies and persons were invited to make representations (under regulation 18) and how this was done, a summary of the main issues raised and how they have been addressed in the local plan. • Any relevant supporting documents. <p>Details will also be provided of where and when the above documents are available for inspection and this will be sent to the bodies and persons invited to make representations. This is called a ‘statement of representation procedure’.</p> <ul style="list-style-type: none"> • A Sustainability Appraisal will be carried out which will be subject to public consultation. If consultation leads to the approach changing significantly this will be reviewed and re-consulted on.
<p>Submission Document</p> <p>Any person may make representations at this stage, but they must be received by the local planning authority by the date specified in the ‘Statement of Representation Procedure’ produced at the ‘Publication’ stage.</p>	<p>We will publish submitted representations on our web sites as soon as reasonable practical, but signatures and private e-mail addresses and telephone numbers will not be visible on our web site, although they will be shown on paper copies that will be sent to the Planning Inspector and may be viewed at the council office.</p>

Stage in Plan making	Consultation that we will undertake for each stage of Local Plan production
<p>Consideration of Representations by Appointed Person</p> <p>Before making recommendations on the plan, the Inspector must consider any representations made on the published plan</p>	<p>We will send the following documents to the Inspector in electronic and paper form:</p> <ul style="list-style-type: none"> • The sustainability appraisal report; • A submission policies map, if the adoption of the local plan would result in changes to the adopted policies map; • A statement setting out: <ul style="list-style-type: none"> • Which bodies and persons were invited to make representation on the content of the plan (Preparation stage); • How those bodies were invited to make representations; • A summary of the main issues raised in those representations; • How any of those representations have been taken into account; • If representations were made at the publication stage, the number of representations made and a summary of the main issues raised; and • If no representations were received a statement that none were received; • Copies of any representations made at the publication stage; and • Any supporting documents the local planning authority consider relevant.
<p>Examination Stage</p> <p>An inspector will be appointed by the Secretary of State to conduct the examination. The Inspector will determine whether the plan has complied with various legal requirements (including the 'duty to co-operate') and whether it is 'sound'.</p>	<ul style="list-style-type: none"> • We will publish (on our web site and at our principal offices) details of the date, time and place of the hearing and the name of the Inspector at least 6 weeks before the opening of the hearing. We will also send these details to anyone who maintains a representation on the plan.
<p>Publication of the recommendations of the appointed person</p> <p>We must publish the recommendations and reasons of the Inspector as soon as</p>	<p>We will publish the Inspector's recommendations and reasons on our web site and at our principal offices. We will also advise those people who requested it that the recommendations are available.</p>

Stage in Plan making	Consultation that we will undertake for each stage of Local Plan production
reasonably practical after receipt of their report.	
Adoption	<p>As soon as possible after the plan is adopted (by resolution of the local planning authority) we will publish on our web site and make available at our main office:</p> <ul style="list-style-type: none"> • The local plan; • An adoption statement; • The sustainability appraisal report; and • Details of when and where the plan can be inspected. <p>We will also send a copy of the adoption statement to anyone who has asked to be notified and send a copy of the adoption statement to the Secretary of State.</p>
Monitoring and Review	<p>Monitoring and Review</p> <ul style="list-style-type: none"> • We will notify all bodies and individuals of monitoring processes/the Monitoring Report and of document Review (if proposed).
<p>In addition for each stage we will:</p> <ul style="list-style-type: none"> • Examine the potential for holding stakeholder events. We welcome your suggestions as to events which would be of particular worth or value. • Issue relevant and informative press releases and press articles. • Make information available in a variety of formats so that those with special requirements are able to participate in the consultation. This may include: <ul style="list-style-type: none"> • Large Print • Different font types/colours • Audio version (via our website) • Translation into other languages (via our website) • Face to face meetings with Officers 	

Summary of the Consultation undertaken and main issues raised at each stage of Plan production

The following table provides an overview of the consultation undertaken at each stage of Plan production and a broad summary of the issues raised in response.

Appended to the report is a much more detailed summary of each stage of consultation and the steps the Council has taken to ensure the development of the Local Plan DPD has been fully informed by the outcome of the public engagement. Four additional reports^{3,4,5,6} have been produced which document the early stages of consultation and responses to the Preferred Approach document- these are very lengthy so have not been appended to this report but record all comments received. Details are noted at the foot of the page and they may be viewed on the website. Subsequent stages of consultation (from the production of the first draft Plan onwards) were reported to the Development Management Committee in their entirety and so all comments received are available to view on the Councils website and in the Committee reports.

Stage in Plan making	Date	Consultation undertaken	Summary of feedback- please note this is very broad and is not intended to provide a detailed commentary of all issues raised
Pre-production stage	Summer 2007	Workshops with East Devon Members	<p>General acceptance of the need for more housing, particularly affordable. General desire for employment land to accompany housing, particularly where well-paid jobs would be provided.</p> <p>Most representatives of towns had concerns re. infrastructure, school capacity and community facilities to serve new development. Axminster, Exmouth, Honiton and Ottery St Mary expressed the view that they required new road or bypass schemes as did some villages.</p>

³ East Devon District Council “Issues and Options: analysis of responses” (2008)

⁴ East Devon District Council “Core Strategy:outcome of the consultation events” (Spring 2010)

⁵ East Devon District Council “Core Strategy Preferred approach:outcome of the consultation events” (Autumn 2010)

⁶ East Devon District Council “New East Devon Local Plan: Consultation Feedback Report on the Draft Local Plan 2011” (April 2012)- produced as a Committee Report

Pre-production stage	Autumn 2007	Workshops with Town and Parish Councils	Again, there was a general acceptance of the need for new development. There was concern at a local level with how development would be accommodated but little objection to the scale proposed
East Devon LDF Issues and Options Report	Winter 2008	Exhibitions Questionnaires	These generated steady but relatively low levels of interest. Opinions on general directions and scale of growth informed the Core Strategy.
Work to inform the Core Strategy	Spring and Summer 2010	Community Consultation and workshops with Town Councils and local organisations Meetings with Parish Councils and questionnaires for them to complete at public meetings Meetings with East Devon Business Forum Meeting with external equalities Forum Social Media- Facebook, Twitter, you-tube video	Repeated general acceptance of the need for more housing, particularly affordable and accompanying employment land. Most towns repeated their concerns re. infrastructure, school capacity and community facilities to serve new development. Parish Councils supplied broad figures for future growth in their villages, with some providing detailed assessments of the type of housing required. Very little concern re equalities issues, methods of inclusion were considered appropriate. Little response to Twitter, criticism in press re the You Tube video. Some response to Facebook but very few opinions expressed.
Initial Plan produced for consultation- Core Strategy Preferred Approach	<p>Key Proposals based on consultation</p> <ul style="list-style-type: none"> • For the period from 2006 to 2026 the Plan proposes around 16,400 new homes (with around 3000 windfalls). • East Devon’s ‘West End’ will accommodate around 41% of dwellings built along with community facilities and public transport systems and high quality employment land 		

		<ul style="list-style-type: none"> • More homes will need to be built in the six main towns of East Devon to serve the needs of those towns, as well as the needs of surrounding rural areas. This will account for around 41% of dwellings built in East Devon. • Development in smaller towns and villages will be limited to meeting local needs and these other settlements will accommodate around 18% of dwellings. • For each new home built we want to see at least one extra job provided. • West End- • Pinhoe Allocation: 450 homes and social, community and commercial facilities and infrastructure. • Additional Pinhoe Allocations (all or part of identified areas): 350 homes and social, community and commercial facilities and infrastructure. • Cranbrook Allocations (all or parts of identified sites): to accommodate up to 2,100 additional homes and social, community and commercial facilities and infrastructure. • Land for the 2026 to 2031 period for 1,500 additional homes will be identified/allocated in later policy document(s). • Skypark Expansion: provision of 10 hectares of land for high quality business uses. • North of Blackhorse Allocation: 2,200 dwellings • Axminster- 400 house allocation at Cloakham Lawn • Exmouth- St John’s Wood 1000 home/15ha employment allocation, Goodmores Farm 350 homes/3ha employment, Liverton phase 3 2.5ha employment, completion of Dinan Way and Plumb Park strategic site of 500 homes • Honiton- land at Ottery Moor Lane identified for comprehensive redevelopment (no no.s specified), 15ha employment allocated on land West of Hayne Lane, 300 houses allocated on land West of Hayne Lane (south) • Ottery St Mary- No strategic allocations proposed • Seaton- 250 houses proposed, but no strategic allocations • Sidmouth- No strategic allocations proposed <p>Hub village approach proposes that villages are allocated 20 or 50 dwellings depending on facilities offered.</p>	
Core Strategy Preferred Approach consultation	Autumn 2010	Community Consultation through: *press releases and adverts	Around 2000 responses. At this stage only strategic sites were indicated on maps, with detailed maps for each settlement to follow in a separate Development Plan Document.

		<p>*e.mails to everyone on database</p> <p>* radio interviews</p> <p>*leaflets to all households</p> <p>*presentations to Parish Council meetings</p> <p>*Social Media- Facebook, Twitter</p> <p>*Workshops with Youth Clubs and Schools</p>	<p>Objections to strategy, distribution of development but especially scale of development.</p> <p>a) Axminster- Support for extra development and a bypass</p> <p>b) Exmouth- Strong objections to level of development, particularly at St John’s Wood and, to a lesser degree, Littleham Valley/Plumb Park</p> <p>c) Honiton- Objection to scale of employment development and concern at housing numbers</p> <p>d) Seaton- Objection to number of houses and call for stronger environmental designation</p> <p>e) Sidmouth- Suggestion that further employment is required (as alternative to Alexandria Road) on land north of the town.</p> <p>f) West End – Limited objection to proposals (despite, or perhaps because of scale of development). Most objection raised by local residents and those advocating (typically development industry) greater dispersal of development across East Devon.</p> <p>g) Strong drive to protect environment/ countryside.</p> <p>h) Opposition to the hub and service village approach on basis that it is too generic.</p> <p>i) Little response to Twitter, continued criticism in press re the You Tube video. Some response to Facebook but very few opinions expressed.</p>
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		<p>j) Opposition website started by 'Communities before Developers' whose main objections were to scale and distribution of housing.</p> <p>k) Broadly, young people identified a shortage of facilities in most settlements and a lack of transport to access facilities elsewhere. Strong environmental awareness and concerns re impact of new development and need for low carbon energy.</p> <p>l) Young people were concerned as to where they would work locally with a significant proportion expecting to move away.</p>
<p>Key revisions made in light of feedback, incorporated into Draft New Local Plan</p>		<ul style="list-style-type: none"> • Axminster- 400 house allocation is increased to 1050, 8ha of employment land and eastern relief road is proposed (this reflected strong local representation in favour of higher growth and by-pass provision) • Budleigh Salterton- Now referred to as a Town and allocated 100 homes (reflecting local concerns that the town should be treated on a par/in line with the other larger/largest East Devon towns) • Exmouth- Scale of development is reduced through deletion of St John's Wood 1000 home/15ha employment allocation, and reduction of numbers at Plumb Park (Littleham Valley) strategic site from 500 homes to 190. Liverton Business Park is increased to 3ha, 150 houses to be found elsewhere. (reflecting strong opposition to development of the St John's site, especially in respect of environmental impact considerations and other concerns around impacts from development on sites) • Honiton- land at Ottery Moor Lane is identified for comprehensive redevelopment to include 150 houses, with 300 more to be found elsewhere, 15ha employment allocated on land West of Hayne Lane (reflecting strong opposition to allocation of land, and suitability for development, of sites on the western side of the town including a proposed allocation in the East Devon AONB). • Ottery St Mary- 400 new homes proposed, including 350 on land west of the town, and 3ha of employment land. • Seaton- Reduction from 250 to 150 dwellings proposed (to be found within existing town if possible), 3ha of employment land to be focussed on Harepath Road, focus on tourism (reflecting opposition to numbers and concern for protection of green wedge to the north of the town)

		<ul style="list-style-type: none"> • Sidmouth- 150 dwellings proposed (to be found within existing town if possible), 5ha of employment land (employment provision reflects concerns that existing provision is inadequate) • West end- Additional development proposed at Cranbrook, increasing overall numbers to 6000 <p>Hub village approach replaced by 5% growth of villages with additional development where requested</p>	
Draft New Local Plan	Winter 2011	<p>Press Release</p> <p>Notified everyone on mailing list</p> <p>Website</p> <p>Comments could be made by e.mail, letter or through 'quick' comment internet form</p>	<p>Around 1400 responses.</p> <p>Relatively few comments on strategy and overall distribution of development, most comments related to specific sites, locations and individual policy wording.</p> <p>Significant number of responses requesting allocations/policies to be shown on maps</p> <p>Broad support for village allocations based on % of population</p> <p>Reduced Numbers at Exmouth supported, concern as to which sites would be allocated.</p> <p>Concern from Seaton and Colyford residents that development should not encroach into the green wedge.</p> <p>Strong opposition to number of houses at Ottery St Mary, concern as to how numbers for Honiton could be accommodated</p>
Key revisions made in light of feedback incorporated into the draft new Local Plan Town Inset Maps		<p>Allocations/policies to be shown on maps (with separate villages document to be produced later)</p> <ul style="list-style-type: none"> • Axminster- Housing/mixed use allocations to be shown at Cloakham Lawns (400 houses) and (650 houses with 8 ha employment land) to the east of the town. A north-south relief road to be shown to the east of the town (along the outer edge of the housing allocation) (this reflects local representation in favour of higher housing numbers and relief road). 	

- **Budleigh Salterton-** To be included as a town with its own Inset Map, rather than being included in the villages document (this reflects local desire to be recognised as a town)
- **Exmouth-** Housing/mixed use allocations to be shown at Goodmores Farm and Plumb Park with a Phase 3 expansion of Liverton Business Park. Completion of Dinan Way to be promoted. Masterplan Area around the seafront/town centre to be included and identified as suitable for 4ha of employment land (this reflects representation that housing numbers were originally excessive, employment should include tourism/retail/office uses in the town centre and seafront areas and Dinan Way should be completed)
- **Honiton-** 15ha of employment land to be shown to the west of the town along with housing allocations at Heathfield Manor (300) and a reserve site for 150 homes on land west of Hayne Lane. (Heathfield Manor was included following comments by the Town Council that it may be preferred to Hayne Lane by local residents)
- **Ottery St Mary-** Housing allocations to be shown to the west of the town (200 and 2ha of employment) and on the Cutler-Hammer (100) regeneration site. (Numbers have been reduced from 400 houses/3ha employment in light of feedback).
- **Seaton-** Housing to be split between two small sites to the north of the town (50 houses), increased density on the regeneration area (75 houses) and windfalls during the plan period (25 houses). Site at Harepath Road to continue to be promoted for mixed use employment/recreation, with Tesco and adjoining town centre land identified for employment. Reserve site identified to north of the town is in the green wedge, so will only be brought forward if other sites don't deliver. (This approach reflects the desire to protect the green wedge, provide employment and recreation land and accommodate most housing within the town)
- **Sidmouth-** 5ha of employment land to be shown at Sidford, 20 dwellings at Manstone Depot, 50 at Knowle, 30 at Port Royal as part of a mixed use scheme and 50 to come through as windfalls.(This reflects representations resisting new housing sites outside the town on environmental grounds and the Town Council/local business desire to provide additional employment land)

Amendments to the Town Centre Shopping Areas/Primary Shopping Frontages to be shown in most towns.

Draft New Local Plan Town Inset Maps	Spring 2012	Press Release	Around 1000 responses, most related to specific allocations now shown on maps
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		<p>Notified everyone on mailing list</p> <p>Website</p> <p>Comments could be made by e.mail, letter or through 'quick' comment internet form</p>	<p>a) Axminster- Few observations received, generally supportive. Some objections to Cloakham Lawns allocation and the route of the new road.</p> <p>b) Budleigh Salterton- Minimal comments, requests that the Built-up Area Boundary be reduced/maintained and that housing numbers be slightly increased.</p> <p>c) Exmouth- General support for Plan amendments (removal of St John's wood site as an allocation, reduced size of Plumb Park site) although some objections to the allocations at Plumb Park and Goodmores Farm.</p> <p>d) Honiton- General support for Honiton as a focus for economic growth but objections to a 15 ha employment allocation west of the town. Comments that proposed housing levels were both too high and too low but support for the development of smaller sites in the town boundaries rather than peripheral green fields.</p> <p>e) Ottery St Mary- Whilst there was concern at the scale of housing and employment growth and a general wish for 100 less homes, little criticism of the strategic direction of growth to the west of the town.</p> <p>f) Seaton- Most concern regarded erosion of the green wedge between Seaton and Colyford and substantial reserve housing/mixed use site. Other objections related to lack of progress on the regeneration area and failure to deliver sports pitches/employment.</p>
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			<p>g) Sidmouth- Large number of objections to (excessive) employment land at Sidford and redevelopment of Knowle. Other objections related to redevelopment of the Drill Hall and loss of Sidmouth’s character.</p>
<p>Key revisions made in light of feedback incorporated into the Proposed Submission Document</p>		<ul style="list-style-type: none"> • Axminster- Minor typographical changes (few objections received, most respondents supportive). • Budleigh Salterton- Housing allocation has increased from 100 plus employment land to 110 houses. Built up Area Boundary has reduced to exclude land to the west (very few comments received, changes resulted from Town Council feedback). • Exmouth- The Dinan Way safeguarding zone has increased slightly to give greater options as to eventual route (few objections were received, general approach was supported). • Honiton- Now aiming to allocate additional development within existing BUAB. Housing land allocated on brownfield site at Ottery Moor Lane (150 houses), the reserve site (300 houses) will be reviewed at the quinquennial stage. Employment land has not been reduced/deleted. (Housing allocations have been amended in light of feedback) • Ottery St Mary- Minor typographical change (few objections received, general approach supported). • Seaton- Housing to be split between two small sites to the north of the town (50 houses), increased density on the regeneration area (75 houses) and windfalls during the plan period (25 houses). Site at Harepath Road to continue to be promoted for mixed use employment/recreation, with Tesco and adjoining town centre land identified for employment. Reserve site identified to north of the town is in the green wedge, so will only be brought forward if other sites don’t deliver (this approach reflected the desire to protect the green wedge, provide recreation and employment and contain most development within the town) 	

		<ul style="list-style-type: none"> • Sidmouth- Employment land is to be phased and developable area at Knowle has been reduced slightly. Scale of employment land and housing numbers remain. (proposals have been amended in light of objections, however the overall approach is retained) • West End- An Inset Map has been produced for West End developments, the Clyst Valley regional park and Infrastructure. (few objections were received, general approach was supported) <p>In addition the Coastal Preservation Area boundary was changed.</p>	
Proposed Document Consultation – Regulation 22	Submission Winter 2012	<p>Press notices published</p> <p>Notified everyone on mailing list (including general and specific consultation bodies)</p> <p>Website</p> <p>Comments were encouraged on the representation form and were also received in paper form, via e-mail and through the website.</p>	<p>2,697 representations were received from nearly 944 representors.</p> <p>Representations related to most areas of the Plan but particularly to the overprovision of employment land, housing numbers (considered to be too high and too low) and the scale of proposed development at Sidmouth, specifically development at Knowle and employment land at Sidford. Appendix 9 shows more detail of the representations received, full text is available on the District Council website.</p>
		<p>Subsequent to this consultation a small number of minor amendments were agreed and all representors were advised of this in writing/by e.mail. Some elected to speak about the amendments at the Development Management Committee on 18 July 2013. A summary of the comments made at the submission stage and subsequent minor amendments is included in Appendix 9.</p>	

APPENDICES

Detailed Summaries of the Consultation that was carried out at each stage and how this shaped the Local Plan

Appendix 1

Pre-production Stage Initial Consultation- August- December 2007

The first stage in producing the new Local Plan was to hold a series of town based workshops with the elected members of the Council to identify future development issues. The location/s under discussion and dates of the meeting and key discussion points are summarised below.

All workshops identified a need for affordable housing throughout the District and a desire to accompany housing with sufficient jobs and community facilities to meet residents needs.

Exmouth and Surrounding Rural Areas - 20 August 2007

Development in General in Exmouth –

- despite being the largest town in Devon, it is physically isolated being bound on two sides by water.
- **villages**, as well as towns, need development. Many villages were served by poor quality public transport and that not everyone had access to private cars, many vulnerable people, including some of the elderly, were therefore immobile and reliant on local services. Along with services in villages it was stressed that mobile facilities are important. Even small scale developments can be important in helping to sustain local services including shops and community transport.

Housing in Exmouth –

- it was suggested that land needs to be identified for housing in Exmouth and potential options could include:
- Relocation of other uses to provide land for housing (especially affordable housing). Eg the hospital and St John's road football ground could be relocated.
- Development of land north of Dinan way/north east side of the town.

- the Hillcrest School Site has been sold
- The closure of Rolle College would 'release' a large number of student houses on to the market, which could provide affordable housing.
- It was suggested that the Council should build **Council houses**.

Employment in Exmouth –

- There was widespread support for extra **employment provision and land allocations**.
- There is a need for small units for emerging and growing businesses, Council owned business properties should help facilitate business growth and expansion and then allow/encourage firms to move on to bigger premises.
- many businesses want freehold not leasehold.

- Camperdown Depot should be released for marine development and Streetscene should be relocated in order to release land for development.
- In the **villages** Woodbury was noted as a location that could accommodate business uses through land provision. Barn conversions can lend themselves to business conversions, for example for IT. Employment sites on the edges of villages were highlighted as a potential development option.
- Increasing use of the Internet means more people can expect to work from home.
- A range of **future employment areas/job types** were discussed including IT jobs with links to colleges with such work requiring high skill levels with high wages. Potential exists for R&D links to the Science Park development. East Devon has an elderly population profile and that future jobs should be appropriate for older people.

Town Centre of Exmouth –

- We should be promoting high quality town centres with diverse business uses. Too many pubs, estate agents and charity shops
- The positive impacts that the Marks and Spencer food outlet has had in Honiton was highlighted. There were calls for more proactive work to be carried out by the Town Centre manager in Honiton.
- Exmouth is 'down-market' town with no shops that act as a 'magnet' to attract other stores or as an 'anchor' store for the town. It was suggested that a 'blueprint' was needed for Exmouth to promote retail activity in the town and shoppers.
- Existing bus and rail services are important to the towns but the stations were of little quality and could reasonably be redeveloped.
- A new supermarket would need to complement the other facilities in the town but could act as a catalyst for other developments
- Strand Gardens in Exmouth would benefit from regeneration through initiatives such as removing ugly shelters and railings, managing traffic and access better, relocating the taxi rank and encouraging more street cafes.

Population –

- We should seek 106 contributions on retirement properties for care facilities. It was also stressed that Exmouth serves a large rural hinterland in respect to providing care services and a lot of care is provided directly in people's houses.

Transport –

- A park and ride scheme was suggested for Exmouth.
- Cycle access into Exmouth was seen as problematic.
- Road links into Exeter from Exmouth need to be improved and parking spaces at the station could be relocated to provide land for development purposes.
- Extra carriages on trains, dualling of tracks and new stops are needed on the line.
- Scope to link across the river Exe from Exmouth to Dawlish Warren in the form of a bridge or a cable car/gondola.
- Query whether completion of Dinan Way is needed and it was suggested the real problem relates to access into Exeter and not getting out of or across Exmouth.
- It was suggested that with respect to links to Exeter, improvements could be undertaken at Clyst St Mary and Countess Wear.

Tourism and Sports and Community Facilities –

- In Exmouth it was seen as desirable that efforts go in to securing a Jurassic Coast Visitor centre and that an option could be to locate this close to the station.

Young people and schools –

- Suggested that Beacon School needs replacing, one option might be relocating it onto a new Rolle College education campus.
- secondary schools in Exmouth (and across East Devon) were operating at capacity
- as part of our work we should be auditing school place numbers.
- concern about anti-social behaviour by a minority of children but recognition of a lack of facilities for young people
- there is a lack of play spaces with some being lost to other uses.

Axminster and Honiton - 21 August 2007

Development in General -

- Development should not be seen as a dirty/negative activity and that it is needed to house people and for employment generation.

Honiton –

- There are not, in principle, objections to development.
- There were constraints on development going north and south of existing boundaries (but some scope for developing southward was suggested).
- Lack of scope for substantial development in Honiton, though Monkton could be one location with potential for development.

Axminster –

- the town could accommodate significant development. However there are challenges in securing employment and over the long term future of Axminster Carpets (it was reported that there are 600 jobs at the carpet company).
- Need identified for more local employment and for a diversity of job types.
- Any housing needs to balance job provision in the town.

Feniton - scope was seen for development potential around the village and there may be a need to respond through the allocation of land for development.

Talaton - the tightly defined boundaries of Talaton were seen as leading to infilling and an urbanisation of the village. There is scope to include land/sites with development potential. Plan to expand outward and not concentrate development 'inward' as a means to avoid too much infilling.

Housing

- There are 238 applicants on the council house waiting list in Axminster.
- In **villages** even small scale development will help promote village vitality
- Affordable housing can keep facilities running - schools, shops, other facilities
- Village Design Statements and Parish Plans should be used to inform LDF production.
- Most villages showed a need for affordable housing
- Viability- market houses are required to make affordable schemes viable.

Employment

- Concern was expressed about a lack of employment land provision.
- existing supply is limited and much was of poor quality and at high rent levels.
- The Council should have land available and help developers find sites.
- need to 'drive wages up'.
- Need to ensure jobs are located close to where people live.
- Look at farm based development/rural areas, eg barn conversions/use of barns not suited to modern agriculture.
- Improve care sector

Honiton –

- Need for employment land in the town is critical
- Land to west of Heathpark was seen as one possible location for future employment land provision.
- The Old Showground was also seen as location with development potential.

Axminster-

- Planning policies have previously prevented Axminster Carpets expansion and development. Town lost out on factory development but carpet company do want to stay.

Population

- Axminster has a declining young person population and an increasing elderly population. A need was identified for a better population mix and balance.

Transport

- Rail links were critical in Honiton and Axminster and rail line dualling was seen as required. Need for more trains and more passing places to improve train services.
- Park and ride, has a potential future in East Devon towns.
- Buses are critical to transport provision but are missing opportunities, eg station links.
- Road noise is an issue and roads should be made quieter.

Tourism and Sports and Community Facilities

- Strong support for provision of sports and community facilities to protect them from loss, especially where facilities are privately owned.
- In **Honiton** the showground should also be used for sports.
- The community centre in Honiton was seen as a priority.
- Lack of parks in Honiton was also highlighted and it was also suggested that if Hayne Lane was used for non-sports use then replacement provision would be appropriate.
- The sports field at Feniton was under threat from development as were the social club and car park. Policy should protect pitch and ancillary facilities
- Rivers are a recreational resource that we do not make sufficient use of.

Health -

- There are limited health care facilities in Axminster and some existing facilities are closing e.g. Phillips Centre.

Sustainable Energy/Climate Change -

- Need to mitigate against climate change, particularly floods. How vulnerable might key services be including electricity, sewerage and water-supply and how would we cope if these utilities were lost.
- Lots of potential but comparatively low levels of renewable energy generated in Devon. Renewable resources include rivers, wave and wind energy and we need to exploit opportunities that might exist.

Ottery St Mary Parish – 10 October 2007

General Issues

- Potential for development but major infrastructure constraints in Ottery town.
- Ottery is a somewhat moribund town with an ageing population and growth would address this.
- change should happen slowly and it was critical to retain the character of the town.

Infrastructure Provision

- Highway access constraints/issues, flooding and drainage are problems but might be overcome through extra development.

Housing

- Concerns about whether 25% increase could be reasonably accommodated.
- Suggested sites for housing growth included greenfield land to the west of the town at Island Farm and land north of Ottery St Mary around Alfington as they would result in less congestion in Ottery town centre.
- West Hill in particular was suggested as a location where substantial housing growth could be appropriate. It does not have the traffic and drainage constraints of Ottery St Mary. It was, however, considered that development should be accommodated through new major Greenfield sites rather than through sub-division of gardens
- Tipton St John was noted as a village with scope for development but it does have some constraints.
- It was also noted that Alfington has scope for further housing growth and this could help with provision of a bypass to the village, which was felt to be needed.

Employment

- Need for future employment growth and development in Ottery St Mary to address out commuting and closure of local employment.
- A range of possible sites were identified for employment, including land at Barrack Road and also further out of town towards/adjacent to the A30/Daisy Mount.

Transport

- Congestion was a major issue in Ottery St Mary. The centre and roads leading in to the town were seen as 'bottlenecks' unsuited to carry the current volume of traffic and particularly larger vehicles.
- Highway links were best to the west of the town, to the A30, so this may be a favoured location for further growth and development.
- Various bypass schemes could be considered for the town although these could run through attractive undeveloped countryside and would be very costly. A bypass for Wiggaton was also suggested.

- A cycle link could be provided from Ottery St Mary to Sidmouth on the course of the old railway branch line.

Community Facilities

- Kings Secondary School is operating at a site that is very constrained and from buildings that are not fit for purpose.
- There is also a need for an enhanced primary school or new primary school in Ottery St Mary as well as new primary schools at Tipton St John and an expanded school at West Hill. All the primary schools in Ottery St Mary parish were identified as over-subscribed.
- There is a need for a swimming pool as well as allotments.
- A park site to the west of the town could be viable.
- A play area is needed for West Hill.

Tourism

- Ottery St Mary should take more advantage of tourism potential in the town. The history and physical attractiveness of the town could be used, and the town would benefit from a new library and museum.

Physical Enhancements

- The entrance to the town would greatly benefit from enhancements.
- The river Otter was seen as an asset, but additional flood prevention works are needed. The Otter bridge link between the school and town centre to be built.

Retail

- Retail is of mixed quality. 8 pubs had closed recently, need a new 'up-market' pub.
- Supermarket provision is very contentious.

Meetings with Towns and Parish Councils- Autumn 2007

Following on from the workshops with District Councillors in August 2007 a further series of workshops were held with the parishes in October 2007.

The letter inviting the town and parish councils to send representatives set out a full page of possible topics for consideration and discussion, under three main headings:

- a) How do you want to see your community change or develop over the next 20 years?
- b) How do you want to see links between towns and surrounding parishes/rural areas change or develop over the next 20 years?
- c) How do you want to see East Devon District change or develop over the next 20 years?

Five sessions were arranged for town and parish council members to attend, loosely grouped geographically:

- a) Sidmouth, Seaton and neighbouring parishes.
- b) Axminster, Honiton and neighbouring parishes.
- c) Ottery St Mary and parishes north and east of Exeter.
- d) Budleigh Salterton and neighbouring parishes.

- e) Exmouth, Lympstone and Woodbury.

It was clear from the meetings that historical opposition to residential development, particularly in villages, is being diluted by the perceived need for affordable housing and a growing realisation that small communities are unlikely to be able to hold on to facilities such as village shops unless they expand as much as possible consistent with not losing their character. It might be observed that if villagers patronised such facilities as are available, on a regular basis and not just for top-up shopping, say, there might be stronger grounds for resisting the loss of the local Post Office, for example.

Although most of the communities seem to be quite well provided for in the shape of clubs and societies, the younger section of society is not so well catered for, and, of course, is less mobile than older car or motorcycle owners. It may be that some residents are reluctant to volunteer to set up youth clubs and the like because of the onerous vetting of them, in the current climate of suspicion and the possibility of false accusations by young people.

Tourism is an important industry, providing not only income to the local economy but a considerable amount of employment in the hotel and guesthouse trade (albeit generally low paid). There was some concern expressed at the closure and/or redevelopment of hotel sites.

Appendix 2

The East Devon LDF Issues and Options Report- Winter 2008

In December 2008, East Devon District Council published a Local Development Framework Issues and Options Report, setting out key planning and development challenges and opportunities facing the District in the future and identifying potential options for responding to them. A questionnaire to accompany the Report was also devised.

A Press release was issued on the 28th November 2008 and the report and questionnaire were distributed to libraries in the District and at Lyme Regis. The Press release referred to the Government's proposals to enlarge Cranbrook to 7,500 dwellings and to site a second new community in the western end of the District; other key issues were identified as ensuring economic prosperity whilst providing housing for local people, and preserving and enhancing its envied environment whilst not forgetting the additional challenge of climate change. It also mentioned the Rural Spatial Strategy's requirement for 5,600 houses elsewhere in the District.

A further Press release was issued on the 16th January 2009. This set out a programme of nine one-day exhibitions around the District, to be held from the 16th to the 30th January.

The exhibition consisted of display boards with posters illustrating:

- The Core Strategy timetable
- Strategic policy guidance
- East Devon's West End (two sheets)
- The A3052 corridor
- Axminster (two sheets)
- Budleigh Salterton
- Exmouth (two sheets)
- Honiton (two sheets)
- Ottery St Mary (two sheets)
- Seaton (two sheets)
- Sidmouth (two sheets)
- Rural communities (two sheets)

Copies of the full questionnaire were available, as were extracts for individual chapters, consisting of the Report text and the questions relevant to that chapter. One, sometimes two, planning policy officers were available to discuss the options (a considerable effort was made to make it clear that they were *not* proposals and other options were being invited) and visitors were able to take away questionnaires and/or Reports if they so wished. Practically no-one chose to fill in a form on the spot.

Honiton

- Growth was seen by many visitors as being realistic only to the west or east, Honiton being squeezed by AONBs to the north and south; generally, people thought that the A30 By-pass represented a logical northern boundary. Traffic at and around the High Street / Dowell Street junction was seen as a serious problem.

- The expansion of the Heathfield Industrial Estate westwards was generally accepted, together with more bulky goods retailers although some comment was made to the effect that housing at the east of Honiton would then be some distance from the employment land in any western extension.
- The shortage of open space in the town was a matter of concern; The Glen is seen as unsafe by some people and there is an under-supply of playing fields.
- Community facilities should be better and more numerous.
- Estimated attendance: 40-50.

Ottery St Mary

- A new supermarket in the town would suffocate smaller shops, of which there was said to be a good range and standard
- Something should be done about traffic in the town (although there were various ideas, not all realistic, about how that could be done).
- The exhibition should pay attention to West Hill, which is in the same parish.
- Estimated attendance: 60.

Sidmouth

- The town could be severely damaged by any significant new development, especially if spreading onto the hillsides adjoining, but it was recognised that the town's age profile and relative lack of employment opportunities (apart from in the low-paid service sector) require that more employment needs to be attracted to Sidmouth.
- Members of the Vision For Sidmouth group attended desire redevelopment at The Ham end of The Esplanade and traffic management and/or pedestrianisation in the town centre.
- Estimated attendance: 70-80.

Clyst St Mary

- 3 Chapters (7,8 and 16) of the Issues and Options Report were relevant to residents in the Clyst St Mary area, since it is close to Rockbeare, Broadclyst, Whimble, Clyst St George and other villages in the part of the District into which the extension of the proposed Cranbrook and a possible second new settlement are located.
- Concern was expressed in respect of the notion of a second new community and most visitors believed that Cranbrook would not be built due to the recession.
- There was little comment in respect of the other large-scale projects for the western part of the District, and some doubt as to whether they would actually bring jobs to local people
- Concern was expressed about airport expansion and possible noise repercussions for existing residents as well as Cranbrook.
- The flood plain in the Cranbrook area continued to cause much concern and cynicism as to whether the measures proposed to deal with it would work.
- Encouraging new businesses along and close to the A3052 was very unpopular and existing businesses cause excessive congestion.
- Rural communities seemed principally interested in affordable housing in or next to existing villages; the number of houses in the District that are rarely-occupied second homes causes considerable resentment.
- Farm diversification is generally to be encouraged, but large vehicles using narrow lanes was considered a major problem.
- Estimated attendance: 40.

Budleigh Salterton

- Generally speaking, visitors felt that the constraints set out in paragraph 10.2 of the Report are important and prevent much opportunity (or desire) for expansion of the town; the shortage of employment land was not seen as much of a problem, since people either work in the shops or can easily commute to Exmouth or Exeter (or are retired).
- Estimated attendance: 50.

Broadclyst

- The views were similar to those expressed at Clyst St Mary, although visitors at Broadclyst felt less immediately threatened by the expansion of the projected Cranbrook
- Few comments were made about a second new settlement, even though Option 1 (the Pinhoe extension) would be close to Dog Village (just to the south-west of the main part of Broadclyst).
- When the Clyst Vale School 'moves' to Cranbrook some of its site should be retained for leisure, retail and employment, not just housing.
- Expansion of the Airport is a concern, due to night flights and engine testing.
- Broadclyst has a good range of public facilities, but does not wish to be swamped by Exeter or Cranbrook.
- Estimated attendance: 35.

Axminster

- Traffic congestion is a major problem in the town and a north-south relief road would be welcome (although this could lead to local shops missing out on trade from motorists no longer passing through the town).
- The large number of new houses required to fund a road would be an acceptable price to pay.
- The flood plain of the River Axe precludes growth to the west, but the undefined limit of eastward expansion could harm the character of the town.
- The retention of Axminster Carpets and Axminster Power Tools were seen as being of great importance as major employers
- Estimated attendance: 80-90.

Exmouth

- There was (still) concern at the prospect of large-scale redevelopment of the estuary site and fears that the supermarket would damage existing traders, whilst the existing buildings were not so bad as to need replacing
- concern at the future of Rolle College and its grounds and support for the idea of a 16-19 years educational use that has been suggested.
- Completion of Dinan Way and possible development to its north caused some comment; one or two people suggested that it would be an appropriate site for a supermarket as well as, or instead of, housing.
- Members of the Save The Avenues from Despoliation (SADs) were concerned that the loss of villas and the construction of flats in The Avenues area was a mistake that should not be allowed to be repeated elsewhere in the town.
- Estimated attendance: 50.

Seaton

- Much concern was expressed as to the likely effect of a new supermarket upon existing small shops, there already being a substantial number of vacant shops in the town.
- Opposition was expressed against the application for 149 houses in Harepath Road (reference 09/0179).

- The 'Green Wedge' should be retained.
- The regeneration area just east of the town centre was treated with some cynicism as to whether and when it would happen.
- Seaton Marshes and the Axe Estuary are recognised for their outstanding wildlife value, engineering work arising from regeneration was seen as a potential threat, through noise, disturbance and pollution.
- There was not much response to the section relating to employment and tourism, although the desirability of a high quality hotel adjoining the estuary had its advocates.
- Estimated attendance: 70-80.

General Comments

- These exhibitions were reasonably successful in placing the apparent options for development before the public, although attendances were a steady trickle rather than substantial numbers.

There were some unfavourable and challenging observations, particularly at Seaton, but not the amount of outright hostility experienced at some previous publicity exercises and many of the comments made were useful and constructive. Numbers of visitors generally reached a peak in mid to late morning and dropped off sharply from mid-afternoon; it appeared that few people could or wished to attend after work. Perhaps future consultations should begin and end an hour or so later, so that a broader spectrum of the public can more conveniently attend.

Presentations to Other Organisations

- In addition to the public meetings scheduled above officers of the Council also made separate presentations during the consultation period as set out on the table below.

Date	Venue	Presentation to	Comment
16 January 2009	Devon County Showground	Devon County Agricultural Association	The Agricultural Association had requested a presentation on future policy issues. The Devon County showground was suggested in the Issues and Options report as a possible site for a second new community. Around 12 members of the Agricultural Association were in attendance and were given a presentation which was followed by a question and answer session.
27 January 2009	Southleigh Village Hall	Axe valley Association of Parish Councils	This Association is made up of Parish Councils in the Axe valley area and the presentation allowed Parish Councils the opportunity to hear a presentation and ask questions. Around 40 Parish councillors attended.
26 February 2009	Rockbeare Primary School	Residents of Rockbeare	The Rockbeare Village Design statement group requested a presentation on future plans, particularly in respect of the expansion of Cranbrook. This event was held after the formal closing date for consultation on the Issues and Option report closed. However because Cranbrook and its expansion are of such significance in a sub-regional context, and could significantly impact on Rockbeare, it was considered desirable to allow the Village Design Statement group to run the event and then for them to collate residents views and submit a collective (late) response. Around 50 members of the public were in attendance, they were given a

Date	Venue	Presentation to	Comment
			presentation which was followed by a question and answer session.

Feedback to the Consultation Questionnaire

Responses were submitted by 478 individuals and organisations. In addition to these responses many respondents submitted supporting representations and documentation. The responses and supporting documentation (saved as pdf files) can be viewed in full on the Council's Planning Policy Consultation Portal on the Council website;

<http://eastdevon-consult.limehouse.co.uk/portal>

<http://www.eastdevon.gov.uk/issuesandoptions.htm#blackhorse> contains a report which gives an analysis of the responses to each question in terms of the number of respondents who selected a particular option (where these were specified) and this is also expressed in terms of percentages a particular option (where only one option could be selected). In some cases a summary of the response from key stakeholders is included.

Appendix 3

Local Development Framework Panel: Emerging Development Strategy and Potential Strategic Allocations for Development

The Local Development Framework Panel met regularly throughout 2009. The Panel meetings were held in private with attendance by interested parties by invitation only. Recommendations of the Panel were reported to the Development Management Committee.

LDF Panel Feedback Report to Development Management Committee

The East Devon Core Strategy needs to be in conformity with the Regional Spatial Strategy which focuses growth in East Devon's West End adjoining Exeter. In order to accord with the RSS the East Devon Core Strategy will seek to accommodate around 11,500 dwellings in East Devon's West End plus 100 hectares of employment land. In the rest of East Devon the Core Strategy will provide for a minimum of 5,600 dwellings. Whilst not objecting to the overall figure of 17,100 dwellings for East Devon the Council did not support the growth of Cranbrook beyond 6,500 dwellings giving a figure of 10,500 dwellings for the West End and 6,600 dwellings for the rest of East Devon.

Larger scale strategic growth is planned for the towns of Axminster, Exmouth and Honiton, identified as key local service centres that offer scope for further expansion and development. Axminster and Honiton are centres where community aspirations for further growth have been expressed and Exmouth, as the largest town in Devon, would be expected to accommodate significant growth.

The other larger towns of East Devon (Ottery St Mary, Seaton and Sidmouth) are more constrained in terms of development potential and/or are less significant service centres. In these towns lower levels of growth will be planned for. In other towns, villages and rural areas of East Devon development and growth will be primarily geared towards meeting locally generated needs whilst sustaining and promoting vibrant local communities, strong and growing economies and protecting and enhancing environmental assets.

At a series of meetings the Panel carried out site inspections and received presentations from agents for developers/landowners who put forward land as potential strategic allocations for development in the Core Strategy at the West End, Axminster, Exmouth and Honiton.

The Panel concluded that

- a second New Community would be very costly to deliver in terms of infrastructure and would raise grave concerns over the credibility of delivery and is unlikely to be supported.
- An urban extension of Pinhoe of less than 1,000 dwelling could be delivered relatively early in the plan period and come with a more modest price tag.
- The area between the proposed Science Park and the River Clyst floodplain to the east could provide for a well connected and integrated residential neighbourhood well related to employment and provide a critical mass of housing and community facilities that would provide around 2,200 dwellings.
- Expansion of Cranbrook to the east and west, with some expansions to the south could provide 6,500 dwellings and protect important planning objectives.
- These strategic options could deliver 9,700 to 10,700 dwellings in the west end leaving the Council at least 6,400 to allocate to the rest of the district.

Axminster

The Panel placed considerable importance on the provision of a relief road to alleviate congestion and address related highway safety and environmental impact concerns on the town centre. This points towards the need to assess how and in what way developments in Axminster, including any proposals in this location, could make effective and viable contributions to secure the provision of a relief road. The Panel supported in principle substantial development east of Axminster, as part of a mixed use development and wished to see work progress on the technical documentation to support the proposals.

Exmouth

The Issues and Options Report set out three green field expansion options: to the north, to the east and to the south-east. The Panel received presentations in respect of each option but Strategic Land Partnerships who were invited to make a presentation in respect of land to the north of Summer Lane, west of Hulham Road, declined. The presentations were positively received by the Panel with the sites having potential for delivering an urban extension to Exmouth and employment/commercial land, well related to key facilities, services and public transport. The Panel wished to see work progress on the technical documentation to support the proposals.

Honiton

The Issues and Options Report set out four greenfield expansion options for Honiton: to the north, east south and west. The Panel considered that a site to the south west of Honiton within the East Devon Area of Outstanding Natural Beauty would deliver few houses and access would be difficult. Land to the west of Honiton both north and south of the railway line for a mixed housing and employment development was important for securing employment but, given the distance to the town centre, residential development was less important. The Panel recognised the need for roads improvements at the Turk's Head junction. The Panel supported the principle of developing to the east of the town for housing and some employment and recognised the need for community infrastructure, and for phased housing provision. The Panel were concerned that the existing A35 acts as a barrier to movement in Honiton and were keen to explore the possibility of development in this location contributing to a by-pass.

Appendix 4

Community Consultation in Spring and Summer 2010

A series of evening meetings were held in six village halls, spread across the District, in March 2010. All Parish Councils were invited (by post and through a follow up e.mail) to send two representatives to the venue most convenient to them. The feedback on the quality and accessibility of the venues was generally very positive. Refreshments were available before and during the meetings.

The meetings included information packs specific to each Parish Council, containing statistics for each settlement taken from the most recent census, house building rates and numbers, Council house waiting list numbers, a map of facilities and services in the Parish (to be updated/corrected and returned to the District Council), a summary of Parish Plan/Village Design Statement information and a paper setting out some of the rural issues that the Core Strategy may address (to act as a catalyst for discussion at the Parish Councils own meeting). Two questionnaires (one relating to the attendees experience of the event and the other for completion at the subsequent Parish Council meeting) and pre-paid envelopes were also included.

An introduction to the meeting was given by Planning Officers. This set out the strategic context of the Core Strategy and explained the Government requirements for additional development in the District. A round table discussion then took place, during which Parish Councillors were asked to consider the issues of most concern to their community and discuss the future of their settlement, particularly whether additional development should be permitted and, if so, of what type and scale. Parish Councils were also asked to identify and provide copies of any recent local research that applies to their community, such as Parish Plans, Housing Needs Assessments, appraisals or similar to add to the LDF evidence base.

Following the meetings, Parish/Town Councils were asked to include an item on their April Agenda entitled "Informing the Local Development Framework" so that the issues raised in the meetings could be debated by the whole Parish/Town Council and the local community with a view to submitting a written response in a standardised format to the Policy Section by mid-May. A press release promoting these events was issued to numerous local newspapers and this informed the public that they could become involved through their subsequent Parish Council meeting if they wished to.

The meetings were well attended, with the majority of Parish Councils participating:-

Location	Date	Parish Council's which attended	
Awliscombe	2 March 2010	Coombe Raleigh PC	Talaton PC
		Awliscombe PC	Payhembury PC
		Broadhembury PC	Gittisham PC

East Budleigh	3 March 2010	Northleigh PC Budleigh Salterton PC East Budleigh & Bickton PC Newton Pop & Harpford PC	Lympstone PC Colaton Raleigh PC Otterton PC Woodbury PC
Musbury	9 March 2010	Kilminster PC Shute PC Musbury PC Colyton PC	Hawkchurch PC Axmouth PC Offwell PC
Broadclyst	10 March 2010	Clyst Hydon PC Poltimore PC Rockbeare PC Bramford Speke PC Rewe PC	Clyst Honiton PC Whimple PC Bishops Clyst PC Aylesbeare PC
Membury	16 March 2010	Membury PC Stockland PC Upottery PC All Saints PC	Yarcombe PC Dalwood PC Membury PC
Branscombe	17 March 2010	Uplyme PC Beer PC	Branscombe PC

Interestingly, the majority of parishes shared the same concerns and several key ‘themes’ emerged strongly from the meetings:-

Rural Communities

Surprisingly, lack of rural facilities was not identified as an issue of huge concern, although there was a suggestion that so many facilities have already been lost, despite strong local feeling, that local Councils are resigned to it. It was acknowledged that older/younger residents tend to rely on these facilities to a far greater degree than the general population. Parish Councils referred to innovative schemes in some villages as examples of good practice and the possibility of sharing facilities in one building, for instance a shop being run from the village hall, or sharing facilities amongst several nearby villages.

There was strong support for the ‘last shop in the village’ retention policy and a consensus that the District Council should encourage the establishment of new facilities in villages (with low-rates incentives, enabling policies etc) and should prevent their future change of use.

Housing (particularly an aging rural population)

Whilst it had been anticipated that affordable housing would be the matter of predominant concern to the parishes, there were in fact differing views as to whether (or how much) affordable housing was needed. Concern was widely expressed that young people aspire to buy their own homes rather than rent through a Housing Association and that most people who work but are on low incomes are unlikely to qualify for RSL housing in any case. This is driving families to nearby towns. A need for 'below open market value' housing was identified by several parishes who asked whether it would be possible to cap prices or ensure that they are only available to local residents.

The aging structure of rural communities was considered to be an increasingly important issue and suggestions of 'life time homes' and sheltered accommodation were put forward at most meetings as ways to ensure that elderly people can continue to live locally. Lack of shopping and medical facilities (particularly for non-drivers) and lack of suitable housing were regularly cited as the main reason for older residents to move into urban areas, although it was suggested that care work could provide local employment.

Broadband

All the meetings expressed disquiet about the slowness of Broadband in their areas. The internet was considered to be an important means of reducing isolation, obtaining goods/services without reliance on the private car and enabling working from home. Poor broadband speeds (and lack of broadband in some areas) mean that some rural businesses can't effectively compete with their urban counterparts.

Rural Economies

There was considerable interest in the desirability of allowing small business premises in the villages, in particular storage or workshop buildings for one and two person enterprises to keep tools and equipment, rather than relying on domestic garages and the like. There was little or no support for larger enterprises which would generate 'in commuting', need premises which could be intrusive and generate noise, smell etc although there was some support for the conversion of existing rural buildings to meet this demand.

Agricultural decline was not identified as a major problem, although it was suggested that diversification into agriculture-related activity should be actively promoted.

There was almost universal support for technology based enterprise which could generate income with minimal intrusion and without detriment to the countryside (it was cited as reducing the need to commute as well as providing highly paid, quality employment opportunities). Broadband was considered the single biggest limiting factor

The attendees were asked to go back to their parish councils and discuss the matters of concern, and return a questionnaire to the District Council to assist in the preparation of a preferred position statement.

Key themes from the questionnaires

The detailed housing numbers and other figures estimated by the Parish Councils can be viewed in the "Outcome of the Parish Consultation- Spring 2010" document on the EDDC website.

Most Parishes now have some form of Parish Plan or Appraisal and considerable emphasis is placed upon the findings of these documents as they are representative of the community and are based on extensive research and consultation. It has not been possible to reproduce these documents as part of this report but a complete summary is available from the District Council, and they are available individually to download from the EDDC website and from the District Council offices.

Some common themes have emerged from the questionnaires, reflecting the concerns expressed during the meetings with Parish Council's:

Rural Communities

Contrary to the discussions with Parish Councils, lack of rural facilities was identified in the questionnaires as an issue of huge concern, and lack of a village shop or Post Office, a community hall, recreation space and play facilities occurred repeatedly as major constraints to village life. A range of ways to secure and retain provision were put forward including private funding, shared facilities, developer contributions, grants and local fundraising. Many communities were also concerned that facilities have a finite lifespan and would need expensive maintenance, often they already rely on voluntary labour and goodwill.

Housing (particularly an aging rural population)

Demand for affordable housing and the need for houses for local people to buy have occurred repeatedly throughout the responses. Some Parish Councils have responded pragmatically that, to achieve the levels of affordable housing they require, they are prepared to accept relatively large numbers of market houses whilst others have taken the stance that they are only prepared to accept the housing for which they have a proven need.

Again the aging structure of rural communities has emerged as an increasingly important issue and sheltered accommodation is required in almost every Parish to ensure that elderly people can continue to live locally.

Broadband and other Physical Infrastructure

The vast majority of Parishes identified slowness of Broadband in their areas as a major problem, particularly in rural areas where broadband is often completely unavailable. This was considered a major hindrance to local businesses and a cause of social isolation. Lack of mobile phone coverage, lack of or insufficient sewerage, drainage and mains gas were also cited as major problems.

Poor road maintenance, particularly rural lanes and infrequent or irregular bus services were frequently cited as impediments to accessing services.

Rural Economies

Opinions varied as to whether employment provision is necessary, with most larger settlements feeling that some employment should be provided whilst the majority of smaller settlements felt that

little or no employment was required. Many Parishes cited numbers of residents already working from home but poor broadband provision was repeatedly raised as an impediment to this.

Where employment provision was required, all settlements felt that it should take the form of small-scale business premises with nowhere identifying a need for anything larger. The feelings expressed at the Parish meetings were reinforced through the questionnaires- re-use of existing buildings is preferable and new development should only take place within or adjacent to existing settlements. Craft type uses and holiday/tourism accommodation and activities were preferred by most but, realistically, many recognised that the the main need is for storage or workshop buildings for one and two person enterprises to keep tools and equipment, rather than relying on domestic garages and the like. Again, there was little or no support for larger enterprises which would generate 'in commuting', need large premises and generate noise, smell etc.

Agricultural decline was not identified as a major problem, although it was recognised as being a key industry in several of the rural parishes. There were suggestions that diversification into agriculture-related activity should be actively promoted, reflecting the feeling of the Parish meetings.

Again, there was a great deal of support for technology based enterprise which could generate income with minimal intrusion and without detriment to the countryside but broadband was considered the single biggest limiting factor.

Appendix 5

Core Strategy Preferred Approach Autumn 2010 Consultation 6th September-30 November 2010

Details relating to this stage can be found at www.eastdevon.gov.uk/preferredapproach.htm .

Timescale	Type of Consultation	Particular Target Group	Means of Distribution	Cost	Notes
Prior to 6 Sept	Press Releases-Forthcoming consultation	Everyone (but likely to be those who can read/adults)	E.mailed to press	Free (Staff time only)	
Prior to 6 Sept	Twitter Release	Everyone (but likely to be those with IT ability)	Advertised on literature EDDC Website/Facebook Press Release	Free (Staff time only)	Need Corporate Policy
Prior to 6 Sept	Parish Magazine article	Everyone (but likely to be those who can read/adults)	Letter/E.mail 'Press Release' to Parish Councils	Post cost/Free (Staff time)	Request article in magazines (rather than separate flier)
6 Sept	Notify everyone on the LDF mailing list	Everyone previously interested/involved in the LDF	Letter/E.mail	Post cost/Free (Staff time)	
6 Sept- 30 Nov	EDDC Website	Everyone (but likely to be those with internet ability)	Advertised on literature EDDC Website/Facebook Press Release	Free (Staff time only)	Need 'Terms and Conditions' Tickbox/landing page
6 Sept- 30 Nov	Facebook	Interest Groups Young People/Families Internet Users	Advertised on literature EDDC Website Through web 'Friends'	Free (Staff time only)	Need 'Terms and Conditions' re under 18's usage
6 Sept- 30 Nov	Limehouse	Interest Groups Professionals/Agents, Internet Users	Advertised on literature EDDC Website	Ongoing Software Cost/ Staff time	Need to set up account- likely to put off casual users
6 Sept- 30 Nov	Public Presentations at Parish meetings	Everyone	Letter/e.mail to Parish Councils	Free (Staff time only)	Could be included in Parish Mag letter
13-20 Sept	Leaflet- Towns/ Rural/ West End	Everyone (but likely to be those who can read/adults)	Posted to all households	Around 25p per leaflet	65,000 print run-
20 Sept	Leaflet- Subject areas	Everyone/ Interest Groups (but likely to be those who can read/adults)	Shops, Interest Groups	Around 10p per leaflet	Could Members deliver to local shops etc?
20 Sept	Press Adverts	Everyone (but likely to be those who can read/adults)	E.mailed to press	Approx £1800 for 4 local papers (all editions)	
11-15 Oct	Local Democracy Week	Young People through Secondary Schools	Visits to EDDC Offices-workshops/presentations Arts involvement no.s?	Free (Staff time only)	Invite Cllr Drew Jane Tancock/Thelma Hulbert Gallery
12 Nov	11 million Takeover Day	Young People through Primary Schools	Visit to EDDC Offices-workshops for 40	Free (Staff time only)	Invite Cllr Drew
To be confirmed	Equalities Forum	Representatives of equalities strands	Attendance at Equalities Forum	Free (Staff time only)	

Autumn 2010 edition	East Devon Talk	Everyone (but likely to be those who can read/adults)			
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The consultation was undertaken in accordance with the timetable above. The responses varied depending on the technique used but, generally, responses were either thematic or specific. To reflect this, the consultation report is split into sections.

The general themes which have emerged from the whole consultation are outlined below, followed by a commentary on each of the techniques used and a summary of any lessons learnt for future consultations. The second section of the report consists of a table listing each Chapter of the Preferred Approach document with a detailed summary of responses received.

General Themes which have emerged from the Consultation

All written comments received on the Core Strategy have/will be logged on the Council's Planning Policy consultation portal. All comments made can be viewed on the software at:

<http://eastdevon-consult.limehouse.co.uk/portal>

We have also produced tabulated reports on comments made that are sorted by:

- a) Comments made in plan order; and
- b) Comments made by postcode of respondents.

These reports are available on the Council web site.

In addition, the minutes of all comments made at the school consultation events, together with all power point presentations and other written documents supplied by the students, will be available to view on the Council's web site. This comprises an estimated body of text of some 20,000 words.

Not counting the words in technical documents submitted with representations, and the schools comments, there are an estimated 600,000 words of text submitted in response to the Core Strategy consultation.

The majority of representations received on the consultation, especially from members of the public/residents of East Devon, were of the view that too much development is being proposed across East Devon in the Core Strategy. These objections typically majored on the scale of housing development being proposed and many cross-referenced to proposed strategic allocation sites and/or were objections to specific strategic housing allocation sites. Respondents were particularly concerned at the scale of growth in Exmouth and the strategic allocation at St John's Wood as well as expressing concern as to how the towns of Ottery St Mary and Honiton could be expected to accommodate their growth.

Many objectors considered that the Council should not seek to match/meet Regional Spatial Strategy housing numbers but should establish lower levels, as done by some other Council's in other parts of England. There were objections that the number of homes should be completely reviewed and some representors suggested that numbers should be established through 'bottom-up' assessments with the onus placed on local communities determining the scale of development that they wish to see built in their locality.

In addition to objections that refer to District wide scales of proposed growth there are also many objections that highlight or major on the scale of growth at particular locations. The levels of proposed growth at the West End of East Devon, including the proposed 8,000 dwellings at Cranbrook, north of Blackhorse and north east of Pinhoe, were subject to specific objection. Matters

raised include site specific/relevant concerns and for individual sites and the collective impacts of the total scale of development.

Amongst the concerns raised in objection to the scale of proposed development was loss of countryside and open space, adverse impacts on wildlife and protected landscapes and the 'urbanisation' of East Devon.

In the villages, there is opposition to the hub and service village approach on basis that it is too generic. Local consultation events demonstrated that villages want to be seen as individual communities where growth and facilities are based on the needs of existing residents rather than a 'one size fits all' approach. Some villages suggested they may want additional development.

In contrast to those favouring lower growth rates there were also representations that supported or endorsed the scale of development proposed in the Preferred Approach document. These were mostly from prospective developer/the development industry (and their agents). There was a widely expressed view in these representation that although the RSS may be going the evidence that underpinned its proposed scale of development remains valid and relevant and therefore it is desirable and appropriate to plan for the scale of development that it, in its last draft (Sec of State changes – 2007), proposed. Some of the representors taking this view, did, however consider that an alternative distribution pattern, spreading more of the West End growth across the rest of East Devon, would be appropriate.

It is relevant to note that very few objectors to the plan questioned the basic structure and format of the plan. There were adverse comments about its length and complexity and a number of respondents considered there to be contradictory comments in it or for it to be vague or to have 'loopholes'. The bulk of objections were to the plan content/proposals. Few objections questioned the principal of including strategic sites in the plan (though specific sites were the subject of objection).

A very extensive consultation with young people revealed that broadly, there is a shortage of facilities for them in most settlements and a lack of transport to access facilities elsewhere. They have a strong environmental awareness and a genuine concern regarding the impact of new development on their local environment. Young people were concerned as to where they would work locally with a significant proportion expecting to move away.

Meetings, Media and the Internet

- Press Releases were issued to the main East Devon newspapers- these are listed in the appendix. Generally the Press responded positively to the consultation although, as opposition increased, some negative reports were made and letters opposing the LDF proposals regularly appeared. There is an ongoing issue with some local newspapers who report LDF matters incorrectly- for instance misrepresenting sites submitted as part of the SHLAA technical assessment as sites which are likely to be developed and using press releases produced by LDF opposition groups without checking that they are correct- generating a great deal of unnecessary concern amongst the public. The later press releases were designed to counter this negative publicity.

- Full page press advertisements were taken out in the main East Devon newspapers. These were relatively inexpensive given the degree of coverage achieved and were accompanied in some cases (notably Exmouth, Seaton, Ottery St Mary and Honiton) by Town Council advertisements or editorial reports for public meetings to inform their responses to the LDF.
- Posters were sent, with copies of the consultation documents, to all Town/ Parish Councils with a request to include an article about the consultation in local magazines.
- All material was made available on the Council's website and several response methods were available to make it easier to reply:
 - Quick comment box for those wishing to make a brief or general point. This could be anonymous but the first part of the postcode was requested so that they can be sorted by area. Comments are available to the public.
 - Limehouse database for those who wished to make a more extensive response or comment on a specific part of the document. Popular amongst agents and consultees, the comments are public, may receive a specific response and updates are sent as the LDF progresses.
 - By post
- Town specific leaflets were posted to every household in the District telling residents about the proposals most likely to be of interest to them.
- Officers attended the External Equalities Forum on November 18th.
- Various Town/Parish meetings took place across the District, Officer attendance was possible at most.

Social Media

We also trialled some more innovative consultation techniques:

- We Plan Anywhere 'youtube' video- has received approx 6,100 views and very mixed responses, but has generated a lot of media and local debate. Responses on the Youtube site are listed in the Appendix.
- Twitter - Tweets were issued at the beginning of the consultation, with further 'reminder' tweets four weeks and one day before the end. It gained a core following but didn't generate many specific responses, instead encouraging users to comment through the Council website. Text was as follows:

September 7th 2010 - "To plan or not to plan that is the question" - we need your help at PLAN-IT East Devon - www.eastdevon.gov.uk/ldfconsultation2010 [5:01 PM Sep 7th](#) via web

September 13th 2010 - "Love it or hate it" we have had 3,500 hits on YouTube - find it on <http://www.eastdevon.gov.uk> [10:18 AM Sep 13th](#) via web

November 2nd 2010 - We are aiming for one new job for every new house is this the right approach ? - help us achieve our ambitions <http://www.eastdevon.gov.uk/> 2:10 PM Nov 2nd via web

November 29th 2010 - Don't forget to send in your consultation responses by tomorrow Tuesday 30th November - Thank you for helping us PLAN IT!!!

- Facebook page - has 75 'followers', has received around 100-150 views per week and around 200 comments on the site. These are set out in full in the appendix. Other Facebook pages and dedicated websites, concerned with specific issues in the Preferred Approach, have been created by private individuals and it seems that viewers are using the East Devon pages to view the proposals but are commenting and debating elsewhere.

Meetings with Parish Councils in Autumn 2010

A series of consultation events were organised by East Devon District Councillors, Parish/Town Councils and/or by local interest groups. The majority were convened so that responses to the Local Development Framework consultation could be informed by local opinion. This was particularly important in those areas where significant change was proposed, and many requested that Planning Officers attend to expand upon the proposals.

As the meetings were organised on an individual basis, the content and format varied depending on the area but all were considered to be useful and all shared common themes- the overall strategy for the District, specific implications for the particular area/Parish, further stages of LDF production with an opportunity for questions.

Date	Town/Parish	Approx no of Attendees	Key Issues Discussed
Fri 8 th Oct	Ottery St Mary (West Hill)	120	<ul style="list-style-type: none"> • VDS 2006- 83% against development of 30+ houses, over 50% against any outside existing centre • Cllr Bloxham- preferred approach should be redrafted to include localism • Hub towns/villages policy means that each will be treated the same: local circumstances not mentioned. Location of employment worrying • Built up Area Boundaries to be retained but flexible-interim policy mentioned. Lack confidence in DM Cmtee. • People asked to copy comments to EDDC to the WH Residents Assn so their view is representative • Cllr Bloxham- C Strategy doesn't match feedback on the 2008 consultation • Numbers are summed up by We Plan Anywhere • Built up Area Boundaries shouldn't be flexible • Website shows SHLAA sites of 47ha in West Hill - (only 1.6 ha found suitable) but shows no. of applications likely. Wrong to treat applicants as clients- Local Plan may not be followed. • Protected areas should be strictly controlled and all should respond to the consultation-current unambiguous policies should be retained. • Doubts as to whether EDDC would take any notice; less people live in villages than in the past. Does West Hill need new homes- sewage and poor transport. Don't want big settlement outside village. • Concerns could be allayed/ increased by the details- how would it be done? Listen to taxpayers. • Sainsburys in OSM will result in downgrading of West Hill: lots of elderly people need WH's shop • Cloakham Lawns (Axm.) permission a concern • Risks to planning for amenity • Wonderful place to live: people must have a place to live- should not pass the buck then complain- WH can't be only place exempt from development.
Tue 19 th Oct	Ottery St Mary Town (Alfington)	25	<p>Following presentation from Cllr Bloxham and an Officer of EDDC the question and answer session covered a wide range of planning policy and implementation matters including:</p> <ul style="list-style-type: none"> • Scale of proposed development across East Devon and specifically at/around Alphington; • Potential impacts of development on the environment; • How local housing needs (for market and affordable housing) can be met through planning policy; • The impacts of in-migration on housing availability; • Adequacy and mechanism for securing appropriate developer contributions and ensure 'gains' are delivered. • The role of Strategic Housing Land Availability Assessment (SHLAA) and concerns that it (sites recorded as achievable, deliverable and available) become default allocations and planning permission will be granted on the because they have 'passed' the SHLAA 'test'.
Thur 21 st Oct	Rockbeare		<p>The Parish Council organised and staffed a 'drop-in' session.</p>

Fri 22 nd Oct	Tale Vale	30	<p>An Officer of EDDC gave a presentation on the Core Strategy Preferred Approach document and along with Cllr Diviani and Cllr Skinner responded to questions. Amongst the matters of concern and interest raised were:</p> <ul style="list-style-type: none"> • Scale of proposed development in villages and rural areas making up the Tale Vale ward, and in surrounding areas; • The potential for expanding village development boundaries to accommodate extra housing/development or other means to promote/support/accommodate development; • Need for affordable housing • Whether there are alternative means, to the register social landlord model (social rent and intermediate provision) to provide affordable housing and the role that these can or should play. <p>How the planning process and policy can help support villages and community facilities.</p>
	Rockbeare	30	<p>The evening meeting was preceded by a 'drop-in' session staffed by the Parish Council held in the afternoon. An Officer of EDDC gave a presentation on the Core Strategy Preferred Approach document and responded to questions. Amongst the matters of concern were:</p> <ul style="list-style-type: none"> • Overall scale of proposed development in the West End and the need for this level; • The technical evidence and justification behind this evidence and how matters have changed post Regional Strategy 'abolition'. • The impacts of the overall development on Ropckbeare village, there was strong support for retention of a Green Wedge between the village and Rockbeare. • Status of current planning applications for development in the West End, especially at Cranbrook.
Thur 28 th Oct	Ottery St Mary	25	<ul style="list-style-type: none"> • Cllr Dobson (Mayor), Cllrs Giles and Cox (Ward Members). • 90 units projected at Cutler Hammer site – how does this fit with Preferred Approach's 180 over 10 years? • Cllrs Giles and Cox in public meetings in October 2007 and with parish councils in August and October 2007. • Built up area boundaries a concern, and SHLAA areas. • Sense of betrayal in respect of Cranbrook and its likely effect on existing settlements. • Junction 39 (of the M5) funding contributions agreed. • Waste management plan required.
	Broadclyst	100	<p>This meeting received presentations from the New Growth Point team and the District Council. Specific attention was paid to the major proposals in the West End of East Devon. Officers gave a presentation on the New Growth Point proposals, an update on schemes and the Core Strategy Preferred Approach document. Officers and Cllr Bowden responded to questions. Amongst the matters raised were:</p> <ul style="list-style-type: none"> • Overall scale of proposed development in the West End and the need for this level of development; • The technical evidence and justification behind this evidence and how matters have changed post Regional Strategy 'abolition'. • The distribution of development proposed through the C S and whether this was justified. • Stresses and pressures that the proposals will place on social and community infrastructure (including schools, roads, medical facilities and other services). • Issues surrounding potential flooding and adverse environmental impacts • The status of current planning applications for development in the West End and concern that proposals are being approved ahead of the policy process. <p>The Broadclyst Parish Council – planning Chair sought a vote of those present on the various major proposals in the West End. There was very high levels of opposition to the major proposals presented in the Core Strategy from the public in attendance.</p>
Thur 4 th Nov	All Town and Parish Councils	35	<p>As part of an annual update the planning service does a presentation to all town and parish Councils. This year there was specific interest in Core Strategy work.</p>

	Lympstone	40	<p>Based on notes from Cllr Ingham and Officer:</p> <ul style="list-style-type: none"> * Over 600 people objected to the large Courtlands development, a very clear message to EDDC * Lympstone has reached saturation point. The school and village infrastructure is overloaded. The drainage system is at capacity, as proved by annual flooding. * Need to keep a defined edge to the village and the Parish. * Lympstone's shape should be defined by the people of Lympstone, not EDDC policy. * Lympstone doesn't want completion of Dinan Way as it would make A376 traffic problems worse. * Affordable housing should be allocated locally by village. * Excessive housing will adversely affect tourism. * Lympstone has no extra space to become a hub village without ruining it. * Building small bungalows for the elderly could free up bigger properties for families. * Businesses are suffering because of the number of empty holiday homes within the village. * Small business units are definitely needed in the village. * Lympstone fears boundary encroachment from Exmouth. *Elderly and bereaved would like specialised living space– would prefer small developments. *Travel facilities lagging behind other villages. * From the meeting, it is my opinion (Cllr Ingham) the vast majority of attendees did not want Lympstone to become a hub village as this would overload its infrastructure rather than help it (the exceptions are some landowners).Almost everyone accepted some minor development- in line with the remaining East Devon villages that are not hub villages.
Wed 10 th Nov	Tipton St John		<p>Following presentation from Cllr Bloxham and an Officer of EDDC the question and answer session covered a wide range of planning policy and implementation matters including:</p> <ul style="list-style-type: none"> • Scale of proposed development across East Devon and specifically at Tipton St John and in the parish of Ottery St Mary; • Potential impacts of development on the environment; • How local housing needs (for market and affordable housing) can be met through policy; • Whether Tipton St John should be a focal point for growth and the overall scale of this growth. • The role of Strategic Housing Land Availability Assessment (SHLAA) and concerns that it (sites recorded as achievable, deliverable and available) become default allocations and planning permission will be granted on the because they have 'passed' the SHLAA 'test'.
	Seaton	40	<ul style="list-style-type: none"> • Retention of and extension of existing green spaces • Seafront improvements • Attract tourists and provide accommodation and facilities eg putting more loos on the sea front • Better sports facilities (pitches) for the youth • Regeneration scheme- need for high quality design and range of shops, not just supermarket
	All Town and Parish Council's		<p>As part of an annual update the planning service does a presentation to all town and parish Councils. This year there was specific interest in Core Strategy work.</p>
Fri 12 th Nov	Aylesbeare		Officers did not attend so no notes available
Mon 15 th Nov	Exmouth		Officers did not attend so no notes available

	Woodbury	8 (All Parish Cllrs)	<ul style="list-style-type: none"> • Woodbury Salterton has had a lot of development in the last 20 years. • Exton's boundary has been removed – why? (no facilities except pub). • Will results of Preferred Approach be subject of further consultation (Yes). • Differing views as to whether further development acceptable. • Concern at continued growth of Greendale Barton.
Tue16 th Nov	Exmouth	30	<p>Jobs</p> <ul style="list-style-type: none"> • Need a sound evidence base to support Employment Strategy – one job / one home. Is this achievable and more than one job may be required? • Small businesses/ properties adapted to include workspace (Live/work) • What is the Strategy to attract jobs, potential entrepreneurs? Answer – show how the area will be protected long-term to retain the quality of life, etc (Exmouth's 'unique selling point). • Education / Training centres (Bicton, Rolle, etc) • 'Green' Tourism – lots of opportunities (Cycleway, WHS, etc) • Can they view the brief for the consultants? • 'Transform' towns – what is being done to promote this...? <p>Landscape and Environment</p> <ul style="list-style-type: none"> • Impacts on the natural environment are of concern - what evidence is there to support this level of growth? Particularly, the extent of growth right up to AONB boundary, etc. Mentioned the Survey being undertaken and need for Appropriate Assessment • Website –hard to find information on the website – eg the SHLAA • "Safeguarding" – important landscapes, features, etc– can LDF be altered to take account of these. • Geographic location and catchment (Quadrant) – brings specific constraints (or opportunities?) unlike anywhere else in East Devon. How does the Strategy reflect Exmouth's special circumstances? eg, distance to travel to the town centre not feasible with peripheral growth <p>Housing</p> <ul style="list-style-type: none"> • Given proximity to Exeter along A30 corridor, rail, etc – why have Honiton and Axminster not been given greater housing numbers? This would appear to make sense in creating this Hub town network? • The group were concerned that LDA's work timetable leaves little or no time to deal with outcomes? Exeter's similar plans (with full public involvement) likely to produce SPD's? Why is this not the case for Exmouth. Need to maintain the momentum give the Strand work, etc <p>Transport</p> <ul style="list-style-type: none"> • Must align with Employment brief/strategy • Sustainable Construction Policy has been diluted? Aim for Code 6 CfSH? • Climate Change key concern- developers must not avoid requirement <p>Consultation Process –Identified twitter, facebook, leaflet, website, etc and events but group felt not enough had been done to engage the population? Explained PAS felt we had achieved a very positive campaign to reach as wide an audience as possible.</p>
	All Town and Parish Council's		<p>As part of an annual update the planning service does a presentation to all town and parish Councils. This year there was specific interest in Core Strategy work.</p>

Fri 19 th Nov	Newton Poppleford		<p>The Parish Council would like to see sufficient development to help finance a Community Hall, a replacement Primary School, provision for light industry and office accommodation and new shopping facilities to reverse the trend of shop closures.</p> <p>The meeting declared 19,400 new homes were far too many. It felt that in order to “sustain and improve the quality of life of residents and conserve and enhance the environmental quality of our towns, villages and countryside” 12,000 new homes would be sufficient.</p> <p>The meeting also expressed the view that the ‘Model’ was wrong in that provision for the infrastructure before building homes was not made clear.</p>
Mon 22 nd Nov	Musbury	20	<ul style="list-style-type: none"> • Suggested 50 houses for hub village is a high proportion of the population of the parish. • Drainage and sewerage are problems. • Check the Parish Plan contents and whether they have been taken into account. • There should be an embargo at Whitford, which has grown considerably. • Local affordable housing was not allocated to local people. • ‘Market’ houses in Seaton are cheaper than ‘affordable housing’ in Musbury. <p>Would prefer not to be a hub village, despite its facilities.</p>

Consultation with Schools and Young People

A programme of fifteen LDF consultation events took place within secondary schools during October and November 2010, which directly represented the views of at least 1700 students (individually contributed, or by delegation). The events were arranged as a variation on a theme to the Local Democracy Week events normally organised by the Democratic Services Team in October each year. Officers from the LDF, DS and Communications teams collaborated to produce a series of events which informed and engaged young people in the workings of Local Government in a real-life real-time situation. In a relatively short period the Council gathered and logged a huge number and range of views from the students participating in the events. This information has formed a relevant, genuine, immediate and representative sample of young people's opinion on issues relating to, and the actual content of, this stage of the LDF preparation.

Councillors from the LDF Panel and the Young People's Champion attended all sessions and Ward Members were invited to observe. Every secondary state school in the District signed up to at least one consultation event, providing extensive coverage of the whole district.

A member of the LDF team made an initial visit to, or contact with, teaching staff in each school to introduce the LDF consultation, to provide materials, to decide the format, and to discuss subjects for debate. All schools undertook different preparation according to the number and age range of the participating students, the curriculum fit and the time available. This preparation involved at least one discussion within each class or school council prior to the event with Councillors, and in some cases included the preparation of power point presentations, written statements to support or oppose an extract from the Preferred Approach document, or debates to garner the opinion of a large class to inform its delegate who would then attend the event with delegates from other classes within the school.

A wide range of issues within the Preferred Approach document were discussed, including climate change, renewable energy production, transport, jobs, social and recreational facilities, affordable housing, ecology, and the environment. A number of formal ballots and/or straw polls were undertaken in each event, and a record of the discussions, ballots and polls was taken.

All students were provided with copies of the Summary Document, were asked to discuss its content with their families, and were encouraged to make further comment on the Preferred Approach via any of the methods available (especially social networking). The full record of comments gathered for each event is available, together with the text of some of the students' speeches, and PowerPoint presentations, on the Council's web site. The following table provides a snapshot of the programme and findings.

School, date and session length	Group size + school yr	Issues	votes	quotes
Axe Valley Community College 12 Oct 1.5 hours	44 Yrs 7 to 13	Town regeneration; Tourism	<u>Regeneration</u> <i>The old buildings in Axminster should be kept and converted to new uses.</i> Agree- 37 Disagree- 7 <u>Tourism</u> <i>We should only encourage and allow tourism developments</i>	"I believe that the vandalism is because the [Webster's garage] site has become everything the youth do not like about Axminster. We need to support community activity and make new businesses more exciting." "Restore old buildings but change their function e.g. youth cafe."

School, date and session length	Group size + school yr	Issues	votes	quotes
			<i>(green, art, food and heritage) that respect the environment</i> Agree- 31 Disagree- 13	“Create an art walk that’s flat and safe to walk on for everyone. Connect people to the landscape. “
Clyst Vale Community College 20 Oct 1 hour	80 Yrs 12 and 13	Housing no.s; Affordable housing; 1 home 2 jobs; Infrastructure provision; Landscape protection	<u>Employment</u> <i>The Councils proposed policy of one home, one job is not enough. There needs to be more jobs per home- 45</i> <i>One home, one job is enough- 0</i> <u>Renewable Energy</u> <i>There should be a gradual approach to ensuring all new developments include renewable energy sources- 43</i> <i>We should be enforcing renewable energy in new developments all right now- 9</i> <u>Food vs Energy Production</u> <i>Land should be used for both food production and energy production e.g. biomass crops and wind farms</i> <i>Agree - 45 Against- 1</i> <u>Affordable Housing</u> <i>The Council should pitch for 40% or more of all developments of any size to be affordable- 40</i> <i>40% or more is too onerous and you won't get any houses built at all- 1</i> <u>Scale of Housing</u> <i>16,000 new houses is about right for the whole District- 21</i> <i>16,000 new houses is too many- 8</i> <u>Countryside: develop or protect?</u> <i>The countryside is too precious for any development- 31</i> <i>Development that is necessary for the economy is acceptable- 30</i>	“There are no cycle paths around here, it’s too dangerous. Light the cycle paths using solar energy.” “Need to put jobs where the houses are, think about transport to jobs and houses.” “16,000 [new homes] would be too many; are there 16,000 people in East Devon that need housing?” “Put solar panels on the roofs of all new houses.” “We want cheap homes, if they have renewable energy homes will cost more. We won’t be able to live here.” “30% of affordable housing being shared equity is not enough. There should be a higher proportion, to assist more people to get on the housing ladder. Suggest 60%”. “We need to use the countryside sustainably for good reasons and pick carefully where we put housing.” “Isn’t the whole point of an AONB to protect it?”
Colyton Grammar School 12 Oct 1 hour	38 Yrs 7 to 13	Climate change; Energy	<u>Energy Industry</u> <i>Should East Devon be a centre of excellence for renewable energy?</i> Yes- 35 No- 3 <u>Securing renewable energy</u> <i>Are regulations more useful than incentives?</i> Yes- 32 No- 3 <u>Wind farms</u> <i>Should wind farms be on-shore?</i>	“The nearest buses to where I live are in town, we have to drive to get there. Need more buses in villages.” “When we build new shops etc they need to be in places accessible by public transport but where they don’t harm the landscape.” “Focus on housing insulation and planning ecologically sound homes and heating systems.” “Get the community involved in renewable energy: they are already aware of the problem it’s just too expensive for them to use it as householders.

School, date and session length	Group size + school yr	Issues	votes	quotes
			Yes- 26 No- 12 <u>Landscape importance</u> <i>We should be prepared to sacrifice our landscape in order to minimise the effects of climate change</i> Agree- 24 Disagree- 13	There will be no effect unless it's easier for people to afford them." "It is important people should be required to do things but also have incentives, maybe a reward for having solar panels. "Have a green levy- money going straight back to an incentives scheme to help the environment." "The Council should use a carrot and a stick. You are the Local Authority, there is not a problem with you enforcing things, you have the authority to tell people how eco-friendly their houses have to be. Don't be scared of being the stick."
Exmouth Community College 20 Oct 1.5 hours	30 Yrs 8 and 10	Improving the town centre; Tourism impact on the environment; Energy conservation and production	<u>Town centre regeneration</u> <i>It is up to businesses to regenerate the town centre- 10</i> <i>The Council should drive the regeneration of the town centre - 20</i> <u>Local or supermarket businesses?</u> <i>We need a large supermarket to provide jobs and bring money into the town- 11</i> <i>We need to spend money and time on improving our town centre for local business development- 19</i> <u>Environment</u> <i>We should exploit the natural environment to promote tourism for the benefit of our economy- 11</i> <i>We need to protect our environment for its own sake, for our enjoyment and the future- 19</i> <u>Biomass</u> <i>I would support a proposal to put a biomass plant just outside Exmouth - 20</i> <i>I would be against putting a biomass plant just outside Exmouth - 4</i> <u>Energy</u> <i>We should try to conserve energy and use less of it - 1</i> <i>We should focus on creating renewable energy- 27</i> <u>Wind turbines</u> <i>We support large scale wind turbine generation near Exmouth on the estuary, sea and/ or land- 15</i> <i>Our countryside and wildlife are too precious to damage- 14</i> <u>Renewable energy production</u>	"More improvements like The Strand." "Improving the town centre will get better revenue than new big supermarkets." "There needs to be an option of supermarkets available." "Have an extra carriage on the train to Exeter. A lot of people currently have to stand up." "More signposts for the cycle path- promote it more." "Conserve the estuary. It brings in a lot of income for fishermen, Stuart Line Cruises etc. A lot of local businesses need it." "Every litter bin should have a recycling compartment." "Have more bird hides- make it easier to watch the wildlife." "Don't build many more houses or it will make the town too crowded." "Exmouth is quite full up. Stop building houses but invest in tourism." "Give households money to buy solar panels and they can pay the Council back when they make a return. " "Totally against wind power. Exmouth is a naturally nice place and it would destroy the environment. " "Some in favour some not - the estuary is good for tidal power if it's not in the way of ships."

School, date and session length	Group size + school yr	Issues	votes	quotes
			<p><i>The Council should be tough on requiring all new households and businesses to incorporate renewable energy in their development – 14</i></p> <p><i>The Council should not require these measures - 9</i></p>	
<p>Honiton Community College</p> <p>1 Nov</p> <p>1 hour</p>	<p>98</p> <p>Yr 12</p>	<p>Whole range of issues within Preferred Approach</p>	<p><u>Renewable energy on new homes</u></p> <p><i>If someone wants to build a new home should it have green energy production methods?</i></p> <p>Yes- 22 No- 25</p> <p><i>It should be somewhere inbetween, the Council should subsidise it.</i></p> <p><u>Recreation</u></p> <p><i>Who should provide recreation?</i></p> <p>Private businesses- 15</p> <p>The Council- 7</p> <p><u>Community centre</u></p> <p><i>Would you support the use of a Council car park for a community centre?</i></p> <p>All voted 'Yes'</p> <p><u>Housing development</u></p> <p><i>Should we allow and promote development that will pay for better facilities (transport, jobs, leisure)- 90</i></p> <p><i>Keep Honiton as it is- 8</i></p>	<p>"Agree with housing development as long as it does not taint the outstanding beauty we live in. Loss of this would ruin the tourism. Only expand within the town. "</p> <p>"Affordable housing is needed but only if there are jobs for people. "</p> <p>"Should locals have a priority on housing?"</p> <p>"Surely we should require energy efficient housing but this will make housing less affordable."</p> <p>"The vast majority walk to school. "</p> <p>"Make more buses and trains more often. There is no good coverage of buses in the evenings. "</p> <p>"A lot of people come to Honiton for the lace and antiques but it needs a more diverse approach."</p> <p>"Have a more diverse town centre. There is nowhere for younger people to shop."</p> <p>"The Council should subsidise the building of a cinema in Honiton. "</p> <p>"Wind farms don't generate that much energy and we wouldn't want to live next to them. Solar energy would be a better idea."</p> <p>"Land is necessary for agriculture, keep agriculture or we are not going to have enough food in this country."</p> <p>"Have a farm/ trekking attraction, paintballing to bring people in. Use the countryside sensitively."</p> <p>"I think that if you want the younger generation to flourish and remain in Honiton you must entertain us! Give us the facilities, housing and jobs we require."</p>
<p>Honiton Community College</p> <p>5 Nov</p> <p>1 hour</p>	<p>35</p> <p>Yr 13</p>	<p>Whole range of issues within Preferred Approach</p>	<p><u>Climate change</u></p> <p><i>Do we have a responsibility to combat climate change?</i></p> <p>Yes- 31 No- 5</p> <p><u>Wind farms</u></p> <p><i>I agree with large scale wind farms to provide renewable energy- 12</i></p> <p><i>The landscape is too precious to put up large scale wind farms- 17</i></p> <p><u>Energy</u></p> <p><i>We should focus on cleaner generation of energy- 22</i></p> <p><i>We should focus on using less energy- 5</i></p> <p><u>Energy efficiency</u></p>	<p>"If we go to University we can't use our degrees round here. All the jobs are up North or in London."</p> <p>"Can we have more graduate employment and jobs without ruining the environment?"</p> <p>"No one has heard of the business centre."</p> <p>"I would get to Exeter for a job by train but it's expensive."</p> <p>"The Park and Ride in Exeter should run later and on Sundays"</p> <p>"If we want to do something about climate change we have to do something big which would ruin the appearance of the countryside."</p> <p>"Although bio-fuels are seen as a good alternative to petrol we already have a shortage of food for people."</p> <p>"The countryside should be used for farming."</p> <p>"Mobile phones have now progressed to the point where it's a competitive market and the same will</p>

School, date and session length	Group size + school yr	Issues	votes	quotes
			<p><i>There should be incentives provided to encourage people to be more energy efficient- 18</i></p> <p><i>There should be regulations that ensure people have to become more energy efficient- 17</i></p> <p><u>Employment land</u></p> <p><i>There should be one new job provided for every new household- 22</i></p> <p><i>To provide this much employment land would destroy the countryside too much- 10</i></p> <p><u>Community centre</u></p> <p><i>A community centre would improve quality of life in Honiton- 17</i></p> <p><i>I am against the community centre- 17</i></p> <p><u>Ottery Moor</u></p> <p><i>I am supportive of redevelopment of Ottery Moor for mixed residential and commercial uses- 25</i></p> <p><i>I am against the redevelopment of Ottery Moor for mixed uses- 10</i></p>	<p>happen with renewable energy technology. Solar energy should be subsidised by the Council or Government until it becomes more competitive and cheaper as technology progresses.”</p> <p>“What evidence is there that Honiton requires more housing? Will these homes be cut off from the rest of Honiton?”</p> <p>“If you put more housing in they will take up the jobs that are needed for the people of Honiton.”</p> <p>“Affordable housing should be given to local people as they are part of Honiton already with children in schools etc.”</p> <p>“It would be better to develop empty homes and brownfield sites before building new ones.”</p> <p>“New housing should be diverse in appearance.”</p> <p>“Villages need to be able to grow 20 – 30 houses but they also need the infrastructure to support it.”</p> <p>Ideas for Ottery Moor site redevelopment: cinema, arcade, night club, shops, go-karting, paintballing, abseiling, cycling...</p> <p>“Can’t have the benefits of the city <u>and</u> countryside at the same time. Honiton is a countryside town and we don’t want it to be a city.”</p>
<p>The King’s School Ottery St Mary 13 Oct 1 hour</p>	<p>90 Year 11</p>	<p>Housing</p> <p>Development of Town Mill site</p> <p>Other topics</p>	<p><u>Housing</u></p> <p><i>250 new homes to be built within Ottery St Mary is about the right number – not supported</i></p> <p><i>250 homes is too many - supported</i></p> <p><u>The Mill</u></p> <p><i>The Mill site should be developed for accessible, cheap recreation- 81</i></p> <p><i>The Mill site should be developed for social housing- 9</i></p>	<p>“Extra homes are a good thing. If the town expands it will be a more 21st century vibrant town. People moving in make the town diverse and interesting. It’s also good for the economy.”</p> <p>“The environmental impact of 250 extra homes will be flooding, loss of greenfields and extra traffic. Ottery is a closeknit community already. The children from 250 extra homes would put a massive strain on the school.”</p> <p>“Building in an Area of Outstanding Natural Beauty is not a good idea. Don’t build outside of the town - regenerate houses we’ve already got rather than building new ones.”</p> <p>“Need homes to be affordable for us.”</p> <p>“Recreation areas for young people are necessary, and the Mill site would be a good place. Need jobs for adults and to attract more young people to live in Ottery St Mary.”</p> <p>“Build part residential affordable housing. Local people can’t afford to buy properties. Have a mixture of housing and heritage/cultural facilities.”</p> <p>“New builds would look odd there. Take into account what’s on the other side of the road. Put a park in the middle with things for teenagers.”</p> <p>“The Mill is too far out of town to provide a transport hub.”</p>

School, date and session length	Group size + school yr	Issues	votes	quotes
				"We need something to do at night. More night time buses needed for villages. The bus services are really bad. It's very expensive to get around if you can't drive. Even if there are buses we have to get driven to the bus stops."
The King's School Ottery St Mary 13 Oct 1 hour	90 Year 11	Housing Development of Town Mill site Other topics	<u>Housing</u> <i>We want 250 homes for OSM 37 votes</i> <i>We do not want 250 homes for OSM 46 votes</i> <u>The Mill</u> <i>The Town Mill site should be used only for recreational facilities - supported</i> <i>Part of the site should be used for housing - not supported</i>	"Not enough homes at present so prices are high" "Not enough jobs now so no new houses needed" "More houses will bring shops and jobs" "OSM is an historic town which needs to be kept small" "Spend money in doing up the area now to encourage people into the town in future" "Say to developers – you must provide new playing fields and sports facilities for school. Train station should be provided" "Use part of Town Mill site as internet cafe, providing a place to go for teenagers. The Youth Club is too structured, we need somewhere less rigid where we can chill out" "Turn the site into flats for students and young people" "It's a listed building so can't be knocked down – you have to be careful what you do with it" "We need a cheaper, later shuttle bus service between Ottery and Exeter" "Later buses from the villages to Ottery are needed" "We don't cycle into town – it is too dangerous and too far (<i>when asked if they cycle, only a handful of students put up their hands</i>)"
Sidmouth Community College 11 th Oct 1 hour	30 Year 8	Tourism Facilities for young people	<u>Tourism</u> <i>Sidmouth should expand to provide more facilities for tourists AND local young people - 26</i> <i>Sidmouth should be conserved at the size it is - 3</i>	"Tourism recognised as being important to the local economy – brings money into the area;" "Town centre very busy during the summer period – causes congestion in the centre;" "Too many empty shops in the town – commercial shops need to be broader in what they offer. Very few shops for young people;" "Recognise that any development in and around Sidmouth needs to fit in with the character of the area;" "Increase the hopper bus service which operates from the Knowle car park – less traffic in the town and therefore less pollution;" "Sidmouth should move towards green tourism;" "Suggestion that the town centre be closed to cars at weekends/summer period – bus access only;" "Sidbury has little to offer to young people – need a footpath to Sidford " "Sidmouth swimming pool should offer more fun swims and slides;"
Sidmouth Community College 11 th Oct 1 hour	30 Year 8	Energy (Solar panels, wav/tide power, watermill, underwater sea turbines) Tourism	<i>Students voted on which method of renewable energy generation they preferred:</i> <i>A Solar Panels 6</i> <i>B Wave/tidal power 5</i>	A - "Need to be less expensive for people to buy" "Will save average family £800 per year" "Using subsidy, recommend solar panels for all schools in East Devon" B - "Tidal power would be economically viable as it wouldn't be dependent upon the weather and waves, but would be linked to tides which don't vary" "Hidden so won't spoil landscape"

School, date and session length	Group size + school yr	Issues	votes	quotes
			<p><i>C Watermill</i> 8</p> <p><i>D Underwater sea turbines</i> 13</p>	<p>“Unclear whether it would affect fishing”</p> <p>C - “Build a mill to collect and use rainwater for power”</p> <p>“To be sited either in the Byes or in a local field”</p> <p>“The site could attract visitors to Sidmouth”</p> <p>D - “ The sea is never still so they will always work”</p> <p>“Expensive to install, but in the long term will save money”</p> <p>“Needs to be sited in an area in which fish stocks are low so fishing boats have no need to go near to them”</p>
<p>Sidmouth Community College</p> <p>19th October</p> <p>1 hour</p>	<p>24 Year 8</p>	<p>Transport</p>	<p><i>Public Transport</i> <i>Buses should be free for children under 16</i> Agree – 22 Disagree – 2 <i>Half the children in the class walk to school, 8 catch the bus, none cycle.</i></p>	<p>“ Buses should run more frequently, and be larger to be able to carry more passengers”</p> <p>“Public transport in Sidmouth isn’t good.”</p> <p>“There should be a park and ride in Sidmouth”</p> <p>“My mum won’t let me cycle to school from Sidbury because of the traffic”</p> <p>“There should be a new cycle path from Sidbury to Sidford”</p> <p>“Most children want to have a car when older”</p> <p>“We should take away car parks in town so people have to use the park and ride”</p> <p>“Pedestrians along the seafront hold up the cars”</p> <p>“The Byes is good for walking and the cycle path is safe and pleasant, we need more like that”</p>
<p>Sidmouth Community College</p> <p>19th October</p> <p>1 hour</p>	<p>25 Year 8</p>	<p>Climate change, flooding and renewable energy</p>	<p><i>How many of you would support energy converted from biomass?</i> 5</p> <p><i>How many of you would want to live next door to such a development?</i> None</p> <p><i>Is climate change a problem?</i> Yes - 25 No – 0</p> <p><i>Can and should we do something about climate change?</i> Yes – 24 No – 1</p> <p><i>It’s not possible to do anything effective.</i> Agree – 1 Disagree – 24</p> <p><i>Would you use your bike more often if there were safer cycle routes?</i> Yes – 22 No – 3</p> <p><i>Should we change the countryside to make cycling safer?</i> Yes – 7 No – 18</p> <p><i>Should we build big sea walls to protect existing coastal development?</i> Yes – 0 No – 25</p> <p><i>Should we sacrifice some development, as sea level rise is a natural process?</i> Yes – 21 No – 4</p>	<p>“Even if we change the way we behave, the problem [of climate change] is likely to keep getting worse, so we can only hope to slow it down.”</p> <p>“We should cut down on carbon emissions.”</p> <p>“The road into Sidbury is really dangerous. Cars come quickly along it and my Dad says to me to be careful on that road.”</p> <p>“At Beer, pavements need to be widened to allow for a cyclepath.”</p> <p>“Perhaps the Council could advertise ways to use your car less, on posters on something? This would make people think twice about using their car for every trip.”</p> <p>“Our hotels are near the seaside, and if they flood, we won’t get any tourists coming.”</p> <p>“You could build bigger sea defences, but the cliffs near Sidmouth will continue to fall, and there are houses on these cliffs.”</p> <p>“Energy saving devices should be automatically installed on new houses.”</p> <p>“We shouldn’t <i>make</i> people have solar panels, but should make strong case for it – persuade, rather than force people.”</p> <p>“Rather than asking individuals to install their own renewable energy on houses in Sidmouth, the</p>

School, date and session length	Group size + school yr	Issues	votes	quotes
			<p><i>Must we have renewable energy of some sort?</i> Yes – 18 No – 7</p> <p><i>Should there be a wind farm outside Sidmouth?</i> Yes – 18 No – 7</p> <p><i>Will harvesting energy from the waves be bad for the tourism industry?</i> Yes – 12 No - 11</p>	<p>town has fields all round it which could be used for large-scale solar energy instead.”</p> <p>“Devon Council could introduce a ‘power plan’, which works like a mobile phone contract, with a range of budget.”</p>
<p>Sidmouth Community College</p> <p>19th October</p> <p>1 hour</p>	<p>25 Year 8</p>	<p>Recreation, entertainment and transport</p>	<p><i>Do we need to provide new recreational facilities?</i> 13 votes</p> <p><i>Do we need to improve existing facilities?</i> 10 votes</p> <p><i>Should recreational facilities be provided by the public or private sector?</i></p> <p>Private sector: 6 votes</p> <p>Public sector/Council: 9 votes</p> <p><i>To pay for these facilities, should we put tax up or stop doing other things?</i></p> <p>a) Put tax up: 2 votes</p> <p>b) Stop doing other things: 15 votes</p> <p><i>When asked what we could stop, one suggestion was play parks for toddlers.</i></p> <p><i>Would you pay £5 per swimming session?</i> 5 agreed</p> <p><i>Would you pay £10 per swimming session?</i> 0 agreed</p> <p><i>Do you expect to work in Sidmouth when you are older?</i> 6 agreed</p> <p><i>Do you expect to live in Sidmouth when you are older?</i> 8 agreed</p> <p><i>If you moved away from Sidmouth, would you return when you are 65?</i> Overwhelming majority said NO</p>	<p>“Free travel to and from activities would encourage young people to go out and be active. If both our parents work regularly and can’t drive us to events and activities, then a free bus pass would allow us to get there ourselves.”</p> <p>“Existing play areas are only for small children. They do not cater for the Sidmouth students’ age group. An outside gym with keep fit equipment was suggested. Some students said they would use it – they would certainly be more likely to use it than a play park.”</p> <p>“Local people should be given a ‘shopping list’ and asked to vote for their top 3 – 5 facilities which would then be implemented.”</p> <p>“Shuttle buses from outlying villages should be provided.”</p> <p>“We would like a Child Councillor Committee where we can vote and make a difference to issues which affect us. Ideas from children are better for children.”</p> <p>“People would stay if there was more for young people. The town is boring at the moment so no-one wants to stay.”</p> <p>“Floodlights in the skate park. EDDC said they would put them up but nothing has ever happened. Injuries happen when young people ride in the dark”.</p> <p>“Floodlights on the rugby pitches. Four teams take part in rugby training and it isn’t always possible to see what is going on on the far pitches when the light begins to go.”</p> <p>“Floodlights on football pitches to enable older children to use the pitches later at night. At the moment they have to finish training early. Would cost between £500 - £1500.”</p>

Equalities Forum

On 18 November 2010 Matthew Dickins and Jamie Buckley attended a joint meeting of the EDDC External Equalities Forum and Corporate Equalities Group to discuss the Local Development Framework Preferred Approach document. A brief introduction to the LDF and previous consultation was given and discussion was encouraged amongst the attendees.

Points raised in discussion:

- You (EDDC) have really gone out of your way to involve children and young people, who usually don't have a say in documents such as this when it is so important to them.
- By sending a leaflet to every household you really have covered a lot of bases including ethnic groups.
- For people who don't have internet access it is good that they can talk to you over the phone or can send a letter, and you will send out paper copies of the documentation. Would you be able to go and visit disabled people?
- The variety of ways in which people can give their views is excellent, not just relying on the internet and complicated software.
- It is good to have produced a fairly accessible summary and leaflet alongside the main document.
- It would be good if people could go to their library, see a copy of the document and leave a comment on a postcard in a 'postbox' there and then. There could also be 'suggestion' boxes in places like the Open Door Centre.
- Where there were equalities groups that have specific planning needs it is good that you invited them to be involved in earlier stages e.g. Gypsies and Travellers.
- What about people like those just out of prison and on probation?
- Could the methods you used with schools be transferred to other groups?
- Could we follow up comments from equalities based groups and find out how they became engaged in the LDF? So we know what works.
- Maybe people are generally happy with their lot, and it's not apathy.
- You have recognised those with learning disabilities will not usually be motivated or able to get involved, we may have to just appreciate their needs and plan for them through their representatives
- People are only going to respond when it interests them. You need to find out what is appealing

Comments on LDF:

- Faith groups who are not prepared to share a premises could be an issue.
- Some homes will need to be adapted for disabled people, as well as being affordable.
- GPs and medical services are out in the community- these services have to be expanded if there is any more development. Exmouth surgeries are chock a block now, we need to make sure health services are maintained for all, including new residents. Also schools.
- Devon has a good reputation of caring for older people and those with disabilities, this attracts people
- DDA regulations are empowering, surely planning now always bears those in mind.
- Make sure you don't ignore the minority voices.

Members of both groups were asked to consider the document and submit their comments in one of the many ways available.

Those members of the group who were not able to attend this meeting were sent the information on the LDF Preferred Approach and were encouraged to submit their comments on behalf of their equalities groups.

Lessons from the Consultation

Whilst the consultation was generally well received and very few complaints have been made regarding the actual methods and implementation, a number of key points have emerged which could be used to improve future participation.

Branding

- All material was clearly branded so that it was recognisable. There is scope for this to be refined.
- There was some confusion as to the name of the campaign and what to electronically search for with “LDF Preferred Approach”, “Plan it East Devon” and “We Plan Anywhere” all being used, individually or in combination.

Press Releases and Advertisements

- These worked well and were effective in countering the negative publicity that was given by some Press. Further encouragement should be given to corroborating facts so that the Press does not misinform readers and generate unnecessary concern.
- The adverts were effective and relatively inexpensive. Future consultation could involve the Town Councils at an early stage so that adverts could be shared and local public meetings/questionnaires included on behalf of the Town Councils. Where consultation takes place over several months, adverts could be taken out at the beginning and end of the process to remind readers to respond.

Posters

- These were eye-catching and clearly branded but they were put up at the discretion of Local Councils and this was outside the control of EDDC.

Town specific leaflets

- These were posted to every household in the District and complaints about the expense had been anticipated. In fact, very few complaints were received, possibly because the source of the funding was clearly identified on them. There is scope to reduce costs in future by combining mailings of information across the Council.
- The leaflets were criticised as, despite being area specific, containing little information about housing numbers etc. This required further research on the part of recipients and generated a lot of requests for further information.

External Equalities Forum

- Attendance at this Forum ensured that minority groups could express their views. This was considered worthwhile, as these groups would not have been identified and targeted specifically otherwise, but, as leaflets were sent to all households, they would have been included anyway.
- Advance briefing, or a follow up meeting, would have enabled Officers to respond in detail to any particular queries the Forum had.

Various Town/Parish meetings

- These were organised locally and so varied in their format and content and the degree of feedback given to the District Council. A standard approach would have made analysis easier and a few complaints were made that the District Council should have organised events in every parish.
- Officer attendance took place at most, but not all, events. This could be improved but current resources would not permit attendance at almost 70 evening meetings in a 12 week period.

EDDC Website

- The 'Quicklinks' box was very widely used and appeared to reduce the number of complaints relating to the Limehouse software. Previously a significant number of users experienced difficulty with multiple login details (mainly agents responding on several clients behalf) and with password resetting but the 'quicklinks' box provided an immediately accessible alternative.
- The volume of responses (particularly at the end of the consultation), and the variety of contact means, meant that comments could not be immediately uploaded for the public to view as all had to be checked and, in many cases, information had to be typed into the database from written correspondence. This caused some concern as to whether comments had actually been received, however it was necessary for all comments to be 'approved' to ensure that nothing inappropriate appeared on the Council's website. Further encouragement to comment early or additional staffing in the final week would address this problem. An automated response explaining that the comments had been received but there may be a delay in processing would also reduce complaints.

Youtube

- The 'weplananywhere' video that was created and uploaded onto Youtube generated a lot of press coverage, some at a national level. The content was much criticised, particularly in terms of cost although the degree of publicity far outweighed this, but EDDC was also congratulated for being innovative and for trying new techniques. Other authorities have produced videos but these have mostly been dull and have not appealed to a wide audience. If this were to be tried again then a greater level of serious informative content should be included, although the 'fun' format could be retained.

Facebook

- Facebook was slow to gain followers over the first few weeks but gradually increased its audience as the proposals were advertised. This was particularly noticeable when an opposition campaign included links to it. Facebook was not extensively used in the way that had been anticipated- to provide direct feedback to the Council about the proposals- but was used to view proposals and then stimulated debate on other websites, outside the Councils control. In future, a clearer title should be given to the page (preferably with 'East Devon' in the title as 'weplananywhere' attracted complaints from those unable to find the page through search engines) and feedback on other sites should also be monitored.

Twitter

- Twitter did not generate as much activity as had been anticipated. It was slow to gain followers and the consultation did not lend itself to regular news updates. This method would be better used on a Council wide basis so that there is already a list of people to contact and regular news to impart.

Appendix 6

The LDF / Local Plan Panel in 2011/12 and Public Speaking

Summer 2011 – Spring 12 was an extremely busy year for the LDF/Local Plan Panel, with 15 meetings being held over the summer and autumn. At one point these were every two weeks. The details of these meetings can be viewed here www.eastdevon.gov.uk/local_plan_panel.htm .

Whereas the Panel meetings had previously been held without the public present it was decided that, at this stage in plan production, it would be appropriate to encourage public attendance and public speaking so that Members of the Panel could hear first hand evidence and direct questions to the public. The public consisted of individuals, local Councillors, Ward Members, developers/agents and invited bodies eg Primary Care Trust.

The Panel began by establishing the topics to be considered and outlining an approximate timetable. Representatives of each settlement were amongst those invited to speak at subsequent meetings. The timetable changed during the autumn in response to the Panel's progress in considering the issues and to reflect speaker availability. On occasion the Panel requested further information and the timetable was flexible enough to enable items to be moved to accommodate this.

It is important to be aware that the work of the Local Plan Panel established a series of objectives for the plan. In summary form these included:

- a) Accommodating appropriate growth and development;
- b) Providing housing – especially affordable housing;
- c) Seeking to secure opportunities for a new jobs, close to homes and where new homes are to be built;
- d) Reducing the need for commuting to work;
- e) Securing more and better facilities;
- f) Conserving and enhancing the environment;
- g) Promoting opportunities for young and old.

These objectives were considered to be key to the direction of future growth in the District and underpinned much of the discussion with speakers.

The following topics were covered by the Panel (the session order was established at the September 6th meeting but topics often overlapped several sessions so the groupings are not absolute):

- Sidmouth.
- Seaton.
- Ottery St Mary.
- Honiton.
- Exmouth.
- Budleigh Salterton.
- Axminster.

- Environment

- Coastal Erosion
- Undeveloped Coast
- Green Infrastructure
- Habitat Regulations and Biodiversity
- Areas of Outstanding Natural Beauty and Landscape Issues

- Affordable Housing
- Neighborhood Planning
- Sustainability Appraisal/Strategic Environmental Assessment

- Retail and town centre issues
- Infrastructure Provision and Links to Section 106 and CIL
- Compliance assessment paper with draft National Planning Policy Framework.

- Transport issues
- Housing Number and Five Year Land Supply
- Towns of East Devon
- Development Management policies – Existing Local Plan Development Management policies to feature in the new plan.

- West End Development
- Villages and Rural Areas development

- Consultation Strategy for Core Strategy Document
- Equalities Impact Assessment
- Economics and Employment Land, Farming and Tourism

- Recreation
- Health
- Renewable energy policies
- Education

- Draft document endorsement

The website provides the full agenda's, minutes, timetable and evidence submitted to the Panel.

Appendix 7

Draft New Local Plan 2011

From December 2011, running through to the end of January 2012, East Devon District Council consulted on a proposed draft new Local Plan. The consultation document comprised of three sections:

- Part 1 - Strategic Policies;
- Part 2 - Development Management Policies; and
- Part 3 - Neighbourhood Planning.

This plan was written in light of the very extensive consultation carried out in 2010 and with extensive input from the Local Plan Panel. Respondents could comment using the District Council website quick comment form, through e.mail or by letter. We notified all respondents to previous consultations by post or e.mail but the database software used for previous consultations was no longer available. No objections to this were received. We placed press advertisements and press releases, as well as notifying all local councils and statutory consultees.

The content of the plan was similar to that of the previous Core Strategy preferred approach, amended to reflect the consultation outcomes. The format of the plan was drafted to accord, as far as possible, with our understanding of emerging thinking and guidance from Government in respect of the (then) localism bill and also as set out in the Draft National Planning Policy Guidance (Draft NPPF). Around 1400 responses to this consultation were received. These can be viewed at www.eastdevon.gov.uk/drafteastdevonlocalplan.htm. Changes proposed in light of these responses can be viewed at www.eastdevon.gov.uk/ldf_agenda_280212_combined.pdf. The majority of these responses related to specific sites or settlements with few objecting to the strategy or format of the plan.

A number of respondents to the consultation document expressed confusion around the boundaries to which some of the proposed policies applied. For example the plan included policy for retail areas/primary shopping frontages but did not show actual proposed boundaries on a map, the onus was placed on people referring back to the map in the adopted Local Plan of 2006 to see boundaries. This caused some confusion as did the issue of how, when and where non-strategic sites would be identified and in what document.

To clarify these issues for our towns (but not rural areas as these will be dealt with in a separate DPD, and the West End has appropriate policy coverage) further work was required to be undertaken to:

- a) Establish methodology and undertaken assessment to define policy boundaries;
- b) Show appropriate boundaries on a map;
- c) Refine policy wording (if required);
- d) Undertake a short consultation on the proposed sites and boundaries and policy wording;
- e) Collate consultation feedback into the final Local Plan ready for pre-submission consultation and submission to government.

Appendix 8

Town Inset Maps Consultation 2012

In order to ensure that people have had the opportunity to see and comments on our emerging spatially defined town based proposals (i.e. lines, sites and allocations on maps for the towns) we made the draft town maps, and key policies, available for public comment over a period of four weeks during May and June of 2012. The consultation documents and the full plan are available on our Council web site. See:

<http://www.eastdevon.gov.uk/nextstages.htm>

Copies of the consultation documents were available to view at the District and Town Council offices, libraries across the District and on the Council's website. Paper summaries were available for each town.

The Town Map consultation exercise received comments from around 750 individuals and organisations. Due to the diversity of comments, the quantity of information, and the cross-references to other documents it is not possible to reproduce the individual responses here.

The full Committee report (17th July 2012) which summarises the feedback and recommended changes is available to view at:

http://www.eastdevon.gov.uk/index/your_council/councillors_and_meetings/development_management_agenda_mins_remit.htm

A summary of the responses is available below:

Axminster

The Local Plan provides for substantive development at Axminster including through two large scale land allocations (Cloakham Lawns and east of the town) and provision in policy for a north-south relief road for the town.

There were comparatively few comments received in respect of Axminster though there remains some opposition as well as support for both of the large scale strategic allocations in the town. Whilst provision of a relief road retains support in the town (including by the Town Council) there are some that question the need and potential impacts. Agents acting for the prospective developers of the site through which the road will pass consider that the alignment needs reconsideration. There are also concerns expressed about the commercial viability of securing the road through developer contributions.

In other representations to the plan there are additional/alternative sites that are promoted for development.

Budleigh Salterton

The Local Plan Inset Map for Budleigh Salterton included two housing allocation sites, one which already benefits from planning permission for 48 houses on the former allotment site at Greenway Lane and a mixed use site adjacent the B3178 (north-east of Deepways) for 52 houses and 10 small business units.

Very few representations were made in respect of the Budleigh Salterton proposals. No objections were received in respect of either of the site allocations themselves, although aspects of the allocations were commented upon. The Town Council requested that the B3178 allocation be increased from 58 to 68 dwellings and no business units be included. They did not feel a mixed use site was needed, stating “this Council understands the owners/developers do not see the need to provide such units”. They also requested that the Built-up Area Boundary be amended to exclude Moorlands and Lansdowne Roads as “this would protect these roads from further inappropriate development”.

The previous Local Plan consultation proposed that the area around Lansdowne Road and Moorlands Road be excluded from the Built up Area Boundary. The original Built up Area Boundary was reinstated in the most recent consultation, so that it included these roads once again. Representations objecting to and supporting this reinstatement have been received.

Other representations requested minor wording changes and amendments to housing numbers and housing site boundaries.

Exmouth

The Local Plan Inset Map for Exmouth included a strategic housing allocation site at Plumb Park, Littleham and a mixed use housing and commercial/employment site on the northern side of the town at Goodmores Farm. The plan also included a proposed employment allocation at Littleham and allocated land for waterfront/town centre regeneration initiatives.

The proposals in the plan came in for limited criticism from people making representations though there were proposals for a series of additional housing/development sites to be allocated in the plan.

Natural England in their responses highlighted the significance of the Exe Estuary and Pebblebed Heaths in respect of wildlife importance and the need to ensure appropriate measures are taken to mitigate against possible adverse impacts arising from development and increased populations. Whilst support was provided by the Highways Agency for matching homes and jobs they did highlight the need to look at possible impacts on the strategic highway network.

Exmouth Town Council raised a number of detailed concerns.

Honiton

The Local Plan Inset Map for Honiton included a strategic employment allocation west of Hayne Lane and north of the railway, a strategic housing allocation at ‘Heathfield Manor’ to the south of

Honiton and a 'reserve' housing site west of Hayne Lane and south of the railway. The Heathfield Manor site was allocated following comments from a Town Council representative that this site would be preferred locally to the west of Hayne Lane housing site. The plan has previously made provision for 150 homes as part of a mixed use redevelopment on land within the town boundary at Ottery Moor Lane, but this allocation was not included in the Inset Plan on the basis that there had been no confirmation from landowners that the land was available for redevelopment. A representation on behalf of Tesco Stores Ltd has now been submitted stating that land in their ownership will be available for housing within the plan period. The 'reserve' site was put forward to provide a housing site only in the event that insufficient land was brought forward for housing development within the existing town boundary.

The proposals in the plan came in for substantial criticism from people objecting to the scale of growth and the proposed housing allocation at Heathfield Manor in particular, which is located within the East Devon AONB.

Natural England in their response highlight Honiton's sensitive environmental location and expressed concerns about the impacts the proposed scale of growth could have and the principle of developing in the AONB when alternative sites are available. The Highways Agency supported the scale of development, subject to infrastructure improvements being developer funded.

Honiton Town Council reiterated their previous submission. Gittisham Parish Council query scale of housing growth, suggest that windfalls and previous unimplemented allocations mean that no strategic housing allocation is necessary, object to development in the AONB and the employment allocation west of Hayne Lane.

Ottery St Mary

The Local Plan Inset Map for Ottery St Mary included a strategic mixed use allocation to the west of the town to accommodate 200 homes, up to 2 hectares of land for employment generating uses (excluding retail) and a range of social, community and open space facilities. A non strategic allocation for 100 homes to incorporate community uses at the former Cutler Hammer factory was also included.

There was very limited criticism of the plans from local residents in comparison to the previous consultation where 400 new homes had been planned for. Developer interests did criticise the scale of housing growth as being too small in relation to the relatively unconstrained environment of the town. Alternative sites were put forward for housing development. The developers of the Cutler Hammer site suggested it could accommodate more than 100 homes, but the representative for the proposed allocation west of the town highlighted constraints on the delivery of this site.

Natural England recommended a specific reference to the protection of the AONB to the east of the town and maintain an objection to the allocation of land until an appropriate assessment has been completed under the Habitat Regulations. The Highways Agency requested mitigation

measure if there were impacts on the strategic road network. Devon County Council highways suggested measures for ensuring sustainable transport options for the mixed use allocation west of Ottery St Mary.

Ottery St Mary Parish Council want no more than 300 homes, no more than 0.67 ha of employment land and an extension of the Primary Shopping Frontage.

Seaton

The Local Plan Inset Map for Seaton included two housing allocation sites, for 20 and 30 houses (necessitating an amendment to exclude them from the green wedge), a proposal that the regeneration area accommodate an additional 75 homes, and an allowance for 25 windfalls during the Plan period. The Plan also proposed a reserve site to be allocated for mixed use development in the event that development isn't delivered in a timely manner on other sites in the Town.

Numerous objections have been received in respect of proposals at Seaton, the majority of which concern the allocation of the reserve site and the intrusion into and erosion of the green wedge between Seaton and Colyford. There is strong support for the retention of the existing Built-up Area Boundary and intensification of development on existing sites in the town. There is some support for sports use in the green wedge.

Seaton Town Council consider that there is no need to encroach into the green wedge at all (a view shared by Colyton Parish Council and objectors). The Plan should be clearer about the number of permissions already granted in the town (so that a clear baseline figure is established) and should then allocate an extra 75 houses at the regeneration site, allow for 25+ windfalls and keep a reserve site for 50+ houses at the football field and caravan site off the Colyford Road. These uses could then be located at the former LSE1 site off Harepath Road to the north of the town.

Sidmouth

Sidmouth generated more comment and interest than other towns and whilst there was opposition to many of the proposals on the Inset Map, especially housing and employment growth. A petition was signed by 3,850 people advising:

"We the undersigned, wish to register our strong objection to the EDDC Local Development proposals for Sidmouth, which, in particular:-

- *Promotes building within the AONB and specifically the creation of 12 acres of Employment land at Sidford.*
 - *Omits mention of EDDC's intentions to relocate from the Knowle and its subsequent use, but allocates 50 new dwellings there.*
- The Local Development Plan provides no evidence for the need for these proposals. We urge the EDDC to engage with the residents of the Sid Valley and to reconsider their overall strategy for the economy of the area."*

There was also opposition to proposed housing allocations in the town, especially at the Port Royal Site and at the Council Offices site at the Knowle. A second petition was received advising:

“I wish to present the enclosed petition opposing the vacation of Knowle by EDDC and the allocation of 50 dwellings as on the attached plans. It was collected mainly by one individual Sidmouth resident and comprises 450 names and addresses of objectors.”

In contrast to those opposing the plan there were comments of support for the plan and proposals, notably employment land north of Sidford. These included representations from private individuals and business and a lengthy response, with supporting technical highway assessment, for agents acting for Fords of Sidmouth.

Given the sensitivity of sites in Sidmouth and the fact that any outward expansion of the town would entail development into the AONB or into the Byes we have undertaken a finer grained landscape assessment of possible development sites promoted in plan representations for Sidmouth.

Appendix 9

Proposed Submission Document Consultation 2012

The Publication Draft is the version of the New Local Plan that is submitted for Independent Examination along with any representations made between Friday 16 November 2012 and Monday 14 January 2013. It is therefore the final draft version of the emerging New Local Plan (2006-2026). The draft was available in hard copy from the District Council Offices and all libraries and Parish Councils across the District. It was also available to view and download online. Press releases were issued and the consultation was widely advertised in the local press and on the websites of local organisations (although this was not instigated by the Council). Comments could be made in writing using a standard form, letter or through the Council's website.

During the consultation there were 2697 responses received on the plan from 944 individuals/organisations with most policies and sections/parts of the plan coming in for objection, though with some support. 93 respondents wished to speak at examination.

As a result of the consultation a number of 'Minor Post Publication Changes' were made at the Development Management Committee meeting of 18 July 2013. All respondents were advised that the changes were proposed (full text was available to view on the Council's website) and a small number of people elected to speak at the Committee meeting. The changes are not considered significant enough to justify additional new consultation and they seek to amend minor errors and anomalies, provide an update on issues and clarify intent of policy; rather than introduce substantive changes to the strategy, or key parts of the plan or land allocations. In addition to text changes there are minor changes to the Proposals Map in respect of Sidmouth that reduces the Knowle site allocation and also in respect of exclusion of areas from the Coastal Preservation Area close to Clyst St George. A very succinct officer summary of the objections and justification for minor changes is set out in the table below. It should be noted that the table is based on a table that went to Development Management Committee in July 2013 and should be read alongside other documents for a complete picture of all matters.

It is stressed that to get a complete picture of all comments made the representations should be viewed in their entirety. Representations can be viewed via the following link:

http://www.eastdevon.gov.uk/plg_lprelibrary3.pdf

In the table that follows the column heading used are:

- a) **Ref Pnt** – This is the RefPoint or reference point in the local plan and provides for interactive links.
- b) **Subject** – This is the subject matter heading or policy title that the RefPoint relates to.
- c) **Officer Summary and Commentary** – A brief officer commentary is provided on representations noting where minor changes to the plan were proposed to Committee.
- d) **Proposed Change** – Where a change was proposed to the plan this is noted in the table and a cross-reference should be made to the amended version of the plan that was appended to the Development Management Committee papers. It should be noted that a separate report in the Local Plan library provides details of the Minor Proposed changes to the plan that have been submitted for Examination.

This table does not seek to identify or comment on all issues raised in all responses (original submitted material must be viewed to see the full details of submissions made). The table highlights what are considered to be the issues of greatest planning importance and those that are considered likely to be of

key significance at examination. In the final column and where very minor changes were proposed to Committee (eg correcting spelling or grammatical errors or updating basic data) reference to changes are not set out. Also it should be noted that the same/similar topics or issues were logged against many parts of the plan but only addressed once (i.e. issues typically appear against the part of the plan they most closely align to rather than through multiple references).

It should be noted that records have been drawn from the Local Plan database as categorised in early June 2013 and the policies/parts of the plan that comments are linked to are liable to change as are summary texts.

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	Introductory Text	Officer Comment: As this introductory text is no longer relevant it is proposed for deletion.	Non relevant text is deleted.
1	Preface - By Paul Diviani - Leader of East Devon District Council	There were a number of comments logged against the preface that relate to matters of detail in the plan. Keys one are picked up/summarised elsewhere in this table. On a general level there were representations that consider that the plan overall does not reflect local community aspirations and wants and that the preface does not accurately reflect what is perceived as a development driven agenda in the plan with insufficient account taken of environmental considerations. Officer Comment: The preface to the plan seeks to give a very succinct introduction and over-view of plan content.	
	Contents Page	Officer Comment: to aid plan users it is considered useful to add text on additional work areas to be undertaken.	New text on additional work areas to be undertaken is inserted.
2	Setting the Context	Concern was expressed that the presentation of policies is confusing and off-putting to average readers and the plan contains grammatical errors and the format should be improved. Also objection to the failure of the Setting the Context to refer to the mistrust with which the public have of the Council and the failure of the Council to provide information and listen to local people. Officer Comment: This section refers to the structure of the plan document and is considered appropriate.	
3	East Devon Key Diagram	The publication draft of the local plan included, on page 11 and 12, reference to the proposals map and the town inset maps. A limited number of comments were made/logged directly against these references.	Minor changes to proposal maps
4	Axminster Urban Inset and Town Centre Map	Officer Comment: In this table and rather than commenting on issues here commentary is provided in respect of the relevant part of the text of the plan that cross-references to the issue commented on (i.e. see further down in this table for relevant matters).	
5	Budleigh Salterton Urban Inset and Town Centre Map		
6	Exmouth Urban Inset Map		
7	Exmouth Town Centre Inset Map		
8	Honiton Urban Inset and Town Centre Map		
9	Ottery St Mary Urban Inset and Town Centre Map		

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10	Seaton Urban Inset and Town Centre Map		
11	Sidmouth Urban Inset and Town Centre Map		
12	West End Inset Map		
13	District Proposals Map		
14	1. Introduction (Chapter)	No comments logged.	
15	The Role of the Local Plan	<p>Amongst concerns raised was objection to the failure of the plan to strategically plan across boundaries in respect of impacts of development from proposed growth and respect of highway implications on Dorset. These objections also relate to requirements for Duty to Cooperate; now a legal requirement of plan making.</p> <p>Dorset County Council are objecting on grounds of what they see as over-development, especially in the east of the District (Axminster) and the implications this could have on highways in Dorset and also broader commuting/sustainability issues, including Dorset residents commuting to jobs in East Devon. West Dorset District Council has objected to the plan on the grounds that provision/scope should be included in the plan to potentially accommodate Lyme Regis/West Dorset growth in East Devon at Uplyme.</p> <p>Officer Comment: It is important to stress that neither Devon nor Somerset authorities have objected to the plan on grounds of failure of Duty to Cooperate. The two Dorset authorities were consulted and their views taken into account (though not necessarily agreed with) in plan preparation.</p> <p>In respect to the Dorset County Council comments there is a difference of views between the two authorities with a clear steer in the local plan policy for growth at Axminster. Dorset County Council includes reference to potential adverse highway impacts on the Trunk road network but the Highways Authority has not objected on this issue.</p> <p>West Dorset members and officers made a presentation to the LDF Panel on their views for Lyme Regis growth. The West Dorset objection is smaller scale and at this stage is not considered to be a key strategic matter. In broad terms Axminster is very close (8km from Lyme Regis centre and 6km from Uplyme centre) and in broad terms is a more sustainable and appropriate place to build homes than either Uplyme or Lyme Regis (other than in respect of meeting very much smaller scale local need). If there is a western side of West Dorset 'overspill' need for housing, that is better met in East Devon rather than West Dorset or elsewhere, then this is likely to be better met in Axminster where substantial growth is proposed (or perhaps Seaton). Also, and as discussed at a Lyme Regis Town Council meeting at which there was East Devon officer attendance and West Dorset member presence, Uplyme and/or Lyme Regis Town/Parish</p>	New text is added to the plan on the Duty to Cooperate.

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		<p>Councils (and potentially combined) could choose to produce a Neighbourhood Plan if they wanted to allocate sites or take more development.</p> <p>Devon Authorities are working on a shared protocol on Duty to Cooperate. Officers have signed a memorandum of understanding on Duty to Cooperate with South Somerset District Council and we are working towards potential formal agreements with Dorset and Somerset authorities. A background paper has been produced on the Duty to Cooperate and is available in the Council evidence library and in updated form will be submitted to the Inspector.</p>	
16	2. Portrait of East Devon (Chapter)	<p>Objection made to use of old data.</p> <p>Officer Comment: Minor change are proposed in the plan to update on data sources – but these are not explicitly referred to in this table as they are very minor/factual in nature.</p>	
17	An Overview of East Devon	<p>A range of comments made including reference to use of now out of date data.</p> <p>Officer Comment: See above.</p>	
18	3. Vision for East Devon to 2026 (Chapter)	<p>The vision section got mixed responses with some support but also concerns expressed that it lacked clarity.</p> <p>Officer Comment: Very minor changes are proposed to the vision section of the plan but these are not directly referred to in this table.</p>	
19	East Devon in the Future and Our Vision	<p>The vision section was subject to a number of detailed comments including some that considered that the vision did not adequately address/encompass protection of the environment objectives as well as comments made on issues to include recreation land, the airport, growth levels, new jobs and homes, and West End development; there was also some support for the vision.</p> <p>Officer Comment: whilst there may be disagreement from some, of the vision, only minor changes are proposed. Comments/objections to the vision are largely related to comments on specific parts/policies of the plan recorded elsewhere in this table.</p>	Plan is amended to include fuller reference to the historic environment.
20	Spatial Vision for East Devon	No comments logged but see above.	
21	East Devon Sustainable Community Plan and Sustainable Communities	No comments logged	
22	What Other Service Providers are Proposing	No comments logged	
23	Equalities Impact Assessment	No comments logged	

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24	4. Key Issues and Objectives (Chapter)	<p>A wide range of comments were made in respect of the vision that included such matters as:</p> <ul style="list-style-type: none"> • Concern around eco-friendliness of wind farms. • Insufficient attention to economic growth matters; • Concern that the plan does not fully address key issues and translate these effectively into policies and the plan is not positively prepared; • Built heritages should be more fully addressed; • A more rounded view of sustainable development is needed; • AONB protection need to be stronger; • Reference should be made to policies on sustainable transport and local employment provision. • Green Infrastructure should feature more prominently; • More emphasis should be given to community services; • Agriculture should be referred to. <p>Officer Comment: This list is a far from complete list of comments made but seeks to give a flavour of some of the concerns highlighted. In response to comments made a number of changes are proposed:</p>	<p>Proposed changes relate to:</p> <ul style="list-style-type: none"> • Carbon emission issues; • Biodiversity mitigation; • Planning for biodiversity; • AONB objectives; • Heritage assets; • Education provision; and town centre/ Brownfield objectives.
25	5. Context and Public Engagement (Chapter)	<p>Comments included requests that additional importance/emphasis be attributed to the NPPF and Parish Plans and forthcoming neighbourhood plans and that public consultation should be undertaken again.</p> <p>Officer Comment: See comments below</p>	
26	The Plans that Inform our Work	<p>Concerns raised that the local plan does not respond to community aspirations and wishes. Devon County Council Waste and Minerals Plan and Education Infrastructure Plan were highlighted as being absent.</p> <p>Officer Comment: Agreed that Neighbourhood Plans should be referred to.</p>	<p>Plan amended to refer to Neighbourhood Plans and also Devon County Council policy documents.</p>
27	Sustainability Appraisal	<p>There were a number of comments on specific sites and issues in the sustainability appraisal and also that the appraisal had not been fully and appropriately used in informing plan strategy and choices and that all possible and reasonable alternatives had not been fully appraised.</p> <p>Officer Comment: A final Sustainability Appraisal report will need to be completed for plan submission and this/associated work will address comments made.</p>	
28	Habitat Regulations	<p>Concern expressed that the plan does not give sufficient certainty that the necessary mitigation measures for development likely to affect the Exe Estuary of Pebblebed Heaths will be in place. I</p> <p>Officer Comment: Whilst text in at this point is not amended elsewhere in the plan text amendments are made in respect of habitat mitigation and regulations.</p>	
29	Exeter and East Devon Growth Point Area	<p>No comments logged.</p>	

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30	Why and How we listened to the Others	<p>Most of the concern raised related to how consultation was undertaken with a number of respondents expressing the view that consultation on the plan had not been as open as could be and that 'localism' should place decision making at the local level.</p> <p>Officer Comment: plan did include extensive consultation and plan text is considered appropriate.</p>															
31	PART ONE - STRATEGIC APPROACH AND POLICIES (Section)	<p>Amongst the concerns raised were the relationships between applying and using the strategic policies and development management policies and needs for more clarity, the tone of the policies and level of detail in the two sections was not seen to be consistent.</p> <p>Officer Comment: whilst minor policy changes throughout the plan are proposed no significant changes are seen as necessary.</p>															
32	6. Spatial Strategy (Chapter)	<p>Comments suggesting development levels are too high and also some that they are too low. Some responses suggested a differing distribution of development.</p> <p>Officer Comment: the overall strategy for development is considered sound and as such no substantive changes are proposed.</p>															
33	Strategy for Development	<p>Key themes featuring in objections included that:</p> <ul style="list-style-type: none"> • there is no clear explanation of how the settlement strategy has been developed; • how the Growth Area proposal might impact on the strategy for the rest of the District; and • how the Plan's proposals relate to those of neighbouring authorities. <p>There were a significant number of respondents that objected to the scale of growth proposed in differing locations, including many that considered the scale of development proposed for Sidmouth was not modest, as plan wording refers to, but was substantial.</p> <p>Officer Commentary: To gain a picture of comparative amounts of growth at East Devon towns we have looked at percentage increases that development would result in. Under plan proposals amended Built-up Area Boundaries (current adopted plan versus new emerging plan) will change by the following amounts:</p> <table border="0" data-bbox="405 1121 761 1337"> <tr><td>Axminster</td><td>+19.8%</td></tr> <tr><td>Budleigh Salterton</td><td>-7.9%</td></tr> <tr><td>Exmouth</td><td>+5.1%</td></tr> <tr><td>Honiton</td><td>+5.0%</td></tr> <tr><td>Ottery St Mary</td><td>+7.0%</td></tr> <tr><td>Seaton</td><td>+3.1%</td></tr> <tr><td>Sidmouth</td><td>+2.3%</td></tr> </table> <p>The above data shows Budleigh Salterton with a decline in the extent of its Built-up Area Boundary but it is unique in so far as we have excluded a part of the town that currently falls in the boundary from the new boundary. For the rest of East Devon Axminster is the one town that does see substantive expansion at very close to 20%. Elsewhere expansion</p>	Axminster	+19.8%	Budleigh Salterton	-7.9%	Exmouth	+5.1%	Honiton	+5.0%	Ottery St Mary	+7.0%	Seaton	+3.1%	Sidmouth	+2.3%	
Axminster	+19.8%																
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		<p>is modest (under 10%) and at Sidmouth outward expansion is the lowest (and the most modest) in percentage terms at 2.3%. The Sidford employment site accounts for 1.3% growth and the Persimmon housing site, now largely built out and gaining permission some years ago 1%. At the end of this table more details are provided on comparative growth levels. Overall no changes are proposed to this section of the plan.</p>	
34	Phasing of Development	<p>There was objection that the plan does not accord with the NPPF timescales and does not plan for at least a 15 year period. Responses included the view that the plan should cover the period to 2031. There were also objections that it should cover much longer periods as well as shorter time periods.</p> <p>Officer Commentary: The plan was written and evolved during the time when the RSS (covering the 2006 to 2026 period was being produced). It was not deemed appropriate to readjust local plan timescales to extend to a full 15 period. However an early plan review is likely to be desirable and also some plan proposals are likely to extend beyond the 2026 end date (eg expansion of Cranbrook). Also new housing projections from Devon County Council suggest our allocations may provide for an element of post 2026 development.</p>	Text is amended to note that under plan policy some post 2026 development could occur.
35	Distribution of Development	<p>There were a range of objections to the distribution of development proposed in the plan with some favouring more emphasis on particular localities (eg West End, towns or villages – as selections of) and others less. Some respondents questioned the West End’s ability to deliver at numbers indicated. At present the plan seeks around 50% of housing provision at the West End, 40% in towns and 10% in villages/rural areas.</p> <p>Officer Commentary: The overall split and distribution of development is seen as appropriate and West End delivery is regarded as realistic. However it is agreed that inclusion of text on how housing numbers were arrived at is desirable.</p>	Text added to advise on housing numbers justification.
36	Strategy 1 - Spatial Strategy for Development in East Devon	<p>There were a considerable number of representations which were split in respect of those favouring more development (especially residential) and those favouring less development (residential and employment). Although not logged specifically against this policy there were a considerable number of representations to other parts of the plan that refer to housing numbers (most advocating lower housing growth overall or in specific towns/locations).</p> <p>Advocates of higher housing levels included a number that supported using RSS housing numbers (17,100) or even more and issues raised stressed need to meet a backlog of need and ‘Exeter overspill’. Those favouring lower levels cited new lower household projections.</p> <p>Officer Commentary: Strategy is seen as appropriate and no changes are proposed.</p>	
37	Employment Provision	<p>There were a number of respondents suggesting that employment land proposed in the plan is too high with some suggesting potential for adverse environmental impacts as well as potential for destabilising the B1 market. There were, however, responses advocating certain sites for development and also advising that it should be made clearer that employment uses extend beyond the B Use Class uses.</p> <p>Officer Commentary: Employment land proposals are seen as appropriate and no changes are proposed to text. Further work has been undertaken assessing employment land and reports are contained in the evidence library.</p>	

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38	Employment Land Provision and Allocations	<p>Responses mirrored those listed above though also included a number of site specific objections.</p> <p>Officer Commentary: See above, no policy boundary/allocation amendments are proposed though there are minor amendments to area totals.</p>	Minor amendments to figures in table.
39	Housing Provision	<p>Further representation received on scale of housing provision in the plan including those suggesting that levels of provision are too high and those that they are too low. Some Respondents considered that provision for windfalls should be included in the plan.</p> <p>Officer Commentary: It is not regarded as appropriate to amend the plan and housing numbers to reflect predicted windfall numbers though it is reasonable to take them into account when looking at five year land supply matters and assessing/monitoring housing delivery at differing parts of the district.</p>	
40	Strategy 2 - Scale and Distribution of Residential Development	<p>Overall housing numbers featured in plan representations as well as concerns relating to the distribution strategy. Amongst concerns raised were:</p> <ul style="list-style-type: none"> • There is a lack of strategy/planning logic behind growth and distribution should not be based (entirely/predominantly) around community wishes; • Over-development at the West end; • Insufficient development promoted at certain towns (inc Exmouth, Honiton and Ottery) with concern of over-development at Axminster; • Too little development promoted at villages (including those closer to Exeter). <p>A number of respondents highlighted specific sites that they consider should be allocated/developed (others objected to allocated sites).</p> <p>Officer Commentary: The distribution strategy has a 'top down' element that has helped inform overall housing numbers (15,000) and which reflects commitments to West End development. It also has a 'bottom up' strategy element that has sought to positively capture community aspirations for development. This strategy has been informed by extensive consultation with Town and Parish Councils and has generally gained support from these bodies. It reflects and applies a 'localism' agenda. The housing table has, however, been updated to a 2013 base date so housing number changes are made.</p>	Updated housing figures to 31 March 2013 base date to reflect current permission and completion data.
41	Future Windfall Housing Completions	<p>There was objection that the levels of windfall development proposed appears to have been based on statistical analysis of past trends only rather than any overall objective assessment including future supply. There was also comment that windfall estimates appear on the low side and should be counted in overall provision. A respondent suggested planned provision should be reduced by 2,000 to account for future windfalls.</p> <p>Officer Commentary: Past trend assessment is considered to be the best available way to assess possible future windfall completions. It is not, however, deemed appropriate to include windfalls as part of the proposed 15,000 dwellings.</p>	Updated text on windfall evidence.

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42	Residential Development Trajectory and Phased Pattern of Development	<p>Objection was raised that the rates of residential development in the trajectory are not realistic, and West End development is overly high. Some suggested figures/trajectory should be reduced and others that more sites should be allocated to promote growth.</p> <p>Officer Commentary: The trajectory is considered reasonable and realistic and no changes (other than to update all housing figures to a 31 March 2013 end date) are seen as appropriate.</p>	Minor changes to text.
43	Graph of Past and Projected Future House Building in East Devon	<p>There were comments that the graph of projected completions is unrealistically high and concern over extent of the West End area and over-emphasis on Cranbrook development.</p> <p>Officer Commentary: See above. West End and Cranbrook projected completions are regarded as reasonable.</p>	Updated graph to reflect 31 March 2013 base date.
44	Sustainable Development, Balanced Communities and Securing Employment, Social and Community Facilities	<p>Concern highlighted over grammatical errors in this part of the plan.</p> <p>Officer Commentary: At this point and elsewhere we will seek to correct grammatical errors as minor changes.</p>	
45	Strategy 3 - Sustainable Development	<p>Whilst there was some support for a Sustainable Development policy there was also concern that it does not more fully align with the NPPF (there was concern that it duplicates/counters thrust in NPPF). Also concern that it does not set out how sustainable patterns of development are to be delivered. A number of respondents highlighted subject matters and issues that they felt policy should explicitly refer to, such as housing delivery.</p> <p>Officer Commentary: As drafted the policy provides an overview of considerations and is regarded as reasonable and appropriate.</p>	
46	Strategy 4 - Balanced Communities	<p>Whilst the thrust of policy received some support, and some suggesting it should be strengthened, there was also the view that the policy is negatively worded, goes beyond the provisions of the NPPF and the Council are likely to use this policy as a means for refusing much needed development. The aging population was highlighted in representations and it was also questioned whether it was realistic to seek to get age balanced communities.</p> <p>Officer Commentary: The policy is seen as reasonable and is written within an East Devon context. Changes are not seen as being needed.</p>	
47	Environmental Quality	<p>Support received to conserve and enhance open spaces but objection to lack of reference to built heritage issues.</p> <p>Officer Commentary: no changes proposed to this part of the plan but see comments below.</p>	

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48	Strategy 5 - Environment	<p>The broad thrust of policy was generally supported in representation. However matters of detail such as lacking commitment to built environment, soil quality and emphases on action on enhancing biodiversity were highlighted. Comment also received that historic assets were not appropriately addressed.</p> <p>Officer Commentary: it is agreed that historic environment issues should feature more prominently here and especially elsewhere in the plan and also that European wildlife site mitigation should be referred to.</p>	Reference made historic environment and European wildlife site mitigation.
49	Sustainable Transport	<p>Objection to references to sustainable transport unless the Council put proposals in the plan to improve public transport make commitments to subsidise bus services.</p> <p>Officer Commentary: No changes are considered appropriate.</p>	
50	Strategy 5B - Sustainable Transport	<p>Whilst policy is broadly supported there was the view that planning should focus significant development in locations which are or can be made sustainable.</p> <p>Officer Commentary: The plan does do this already by seeking contributions for transport at and for strategic schemes. However, smaller scale development will lack mass to make this a reasonable or realistic possibility and therefore (and in the absence of realistic possibilities of sustainable transport provision) plan changes would be inappropriate.</p>	
51	Built-up Area Boundaries	<p>The reasoning being having Built-up Area Boundaries was broadly welcomed though there was some concern that they are not appropriately applied.</p> <p>Officer Commentary: Changes are not seen as necessary.</p>	
52	Strategy 6 - Development within Built-Up Area Boundaries	<p>There was objection that Built-up Area Boundaries have not been drawn in a consistent manner and do not accurately reflect what is built up on the ground. Also specific sites were subject of objection. There was also objection that as worded it would hamper the ability for Neighbourhood Plans to redefine boundaries or allocate or promote development beyond boundaries.</p> <p>Officer Commentary: The plan makes it clear that the boundaries do not seek to 'describe' what is built on the ground but rather to inform where new development should go. However concerns in respect of Neighbourhood plans are noted.</p>	Amendment to clarify that Neighbourhood Plans can promote development beyond boundaries. Change also added in respect of reference inclusion to Landscape Character Assessment.
53	Strategy 7- Development in the Countryside	<p>Whilst the broad thrust of policy was supported in some comments there were matters of detail that were objected to and also some considered the policy was too flexible in what it allowed and others that it was too restrictive.</p> <p>Officer Commentary: Changes are not seen as necessary.</p>	
54	Green Wedges and Settlement Coalescence	<p>There was the view that Green Wedges should be allocated between Ottery St Mary and West Hill and Sidmouth and Sidbury and elsewhere.</p> <p>Officer Commentary: The existing Green Wedges are drawn at the key separations between settlements and further designations are not seen as necessary.</p>	

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55	Strategy 8 - Development in Green Wedges	<p>Whilst there was some support for Green Wedges and suggestions for new designations there was also objection that the plan is flawed in identifying areas of constraint by designating Green Wedges. The NPPF advises that criteria based policies utilising tools such as landscape character assessment, should provide sufficient protection. There was also concern that a plethora of other designations afford appropriate protection.</p> <p>Officer Commentary: Whilst noting NPPF issues the Green Wedges in East Devon go beyond landscape considerations and are seen as important.</p>	
56	7. Development of East Devon's West End (Chapter)	<p>Objections were raised to lack of infrastructure provision to serve the West End and impacts from development. There was also support for West End developments.</p> <p>Officer Commentary: Infrastructure provision for the West End is seen as appropriate.</p>	
57	Our vision for the West End is one of:	<p>Objection that the purpose of the West End is not to complement the role of the City of Exeter rather it is to serve the needs of the City of Exeter. In a response it was seen as vital that development in the West End is based around a comprehensive approach which seeks to utilise the sites of the highest quality.</p> <p>Officer Commentary: The manner that West End wording and policy is set out is seen as appropriate.</p>	
58	West End Sub-Regional Housing and Employment Provision	<p>Amongst a small number of comments a concern was raised that the plan fails to provide an adequate geographical definition of the West End.</p> <p>Officer Commentary: A spatial boundary around the West End is not seen as appropriate. The West End is defined as those schemes that make up the major development close to Exeter.</p>	
59	Strategy 9 - Major Development at East Devon's West End	<p>There was mostly support for the strategy for development at the West End though some of the sites were objected to as was the absence of an additional allocation at Tythebarn Green. There was objection to the plan not requiring that the rail junction be given absolute priority and is funded and completed as soon as possible.</p> <p>Officer Commentary: As set out the plan is considered appropriate.</p>	
60	West End Green Infrastructure	<p>Whilst there as support for West End Green Infrastructure there was also objection that the plan suggests that building on greenfield sites is better than leaving them alone.</p> <p>Officer Commentary: As set out the plan is considered appropriate.</p>	
61	Clyst Valley Regional Park	<p>It was highlighted in a response that timely delivery of Clyst Valley Regional Park is pivotal to soundness of plan and must be secured if housing allocations not to adversely affect integrity of Exe Estuary and East Devon Heaths Natura 2000 and Ramsar sites. The view was expressed that Clyst Valley Regional Park should include Ashclyst Forest and timetable for Infrastructure Delivery Plan should be made clear and built heritage assts referred to.</p> <p>Officer Commentary: Minor changes to the plan in respect of the Clyst Valley Regional Park are seen as appropriate.</p>	Changes made referring to Clyst Valley Regional park.
62	Green Infrastructure in	<p>Whilst the Clyst Valley Regional Park proposals gained support there was all objection that there is no evidence presented by the Council that the Clyst Valley Regional Park will be deliverable either at all or certainly in advance of or</p>	Minor changes in respect of references to green

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	East Devon's West End	<p>alongside the delivery of the development proposed. The view was expressed that details needed to give confidence that the park will offer mitigation for impact of housing development on Exe Estuary and East Devon Heaths. Timing of delivery needed with attributes that will take pressure from more environmentally sensitive locations.</p> <p>Officer Commentary: It is not seen as appropriate to include evidence in the plan of delivery, this will, however, be worked up through other council and Growth Point work. Though minor changes to policy wording are proposed.</p>	infrastructure, multi-agency working and heritage assets.
63	West End Physical Infrastructure	<p>Objection to wording in paragraph on West End Physical Infrastructure - Line 3: Delete "attention", insert "importance".</p> <p>Officer Commentary: change not seen as necessary.</p>	
64	West End Transport and Movement	<p>Representations' highlighted works that have taken place and that the plan should be updated.</p> <p>Officer Commentary: Proposed change to the plan to show works that have been completed and also to clarify highway assessment and mitigation measures.</p>	Proposed change to the plan to show works that have been completed and also to clarify highway assessment and mitigation measures.
65	Potential for Development on the A3052 Corridor	<p>A representor is promoting a major development on the A3952 corridor and considers that there is highway capacity for such a scheme as well as a broader development need. There are also responses that were concerned about the scale of existing development and further building.</p> <p>Officer Commentary: Major development in the A3052 corridor is not seen as appropriate.</p>	
66	Additional Infrastructure at the West End	<p>There was objection to Sainsbury's distribution site area figure not being included in the overall figures for employment land.</p> <p>Officer Commentary: We have consistently not included the Inter-Modal in employment land calculations because of the unique nature of the facility.</p>	
67	Strategy 11 - Integrated Transport and Infrastructure Provision at East Devon's West End	<p>Whilst there was support for integrated West End transport provision there as also concern that policy as drafted is no more than general statement about sustainable transport and it should set out support for specific schemes.</p> <p>Officer Commentary: Policy as drafted is seen as appropriate.</p>	
68	Expansion of Cranbrook	<p>There was objection that the proposed expansion of Cranbrook over the plan period is over-ambitious both in terms of housing and employment land delivery. And that there is no explanation/justification for level or location of development at Cranbrook beyond what already has planning permission.</p> <p>Officer Commentary: The development rates and expansion of Cranbrook is seen as appropriate.</p>	

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69	Strategy 12 - Development at Cranbrook	<p>The expansion of Cranbrook was generally supported though some respondents considered that greater levels of development would be appropriate. There was, however, the counter view that proposals were over-optimistic and the plan is too over-reliant on this site for meeting housing needs.</p> <p>Officer Commentary: The development rates at Cranbrook are seen as appropriate.</p>	Minor changes are proposed in respect of reference to education and service provision.
70	Land North of Blackhorse/Redhayes (Tithebarn Green)	<p>There was objection to allocation of Land North of Blackhorse/Redhayes and planning permission granted on the basis of un-phased provision and lack of infrastructure to support development, especially education and health.</p> <p>Officer Commentary: This site has a resolution to grant permission and proposed changes to plan should reflect this issue.</p>	Status of site amended in wording and in respect to highway issues.
71	Strategy 13 - Development North of Blackhorse/Redhayes	<p>Whilst there was some objection to this land allocation the site now has planning permission.</p> <p>Officer Commentary: this site has a resolution to grant permission but see above for proposed text changes.</p>	Reference included to employment provision.
72	Land in East Devon Adjacent to Pinhoe	<p>View expressed that a new primary school should be referenced in para 7.35.</p> <p>Officer Commentary: this is agreed with.</p>	Reference to Primary School added.
73	Strategy 14 - Development of an Urban Extension at Pinhoe	<p>Whilst the principle of substantial development was generally not objected to there were alternative/additional sites promoted in representations. The significant impacts this development will have on M5 Junction 29 and the A30 where highlighted and noted that there was to be to enhancement to bus services and highways.</p> <p>Officer Commentary: The allocated sites are seen as appropriate.</p>	
74	West End Intermodal Interchange Facility	<p>Objection to the fact that the plan does not note that a considerable number of jobs will be created at the West End Intermodal Interchange Facility. And also object to excluding multi modal freight terminal in calculation of total allocation of employment land.</p> <p>Officer Commentary: We have consistently not included the Inter-Modal in employment land calculations because of the unique nature of the facility. It is recognised, however, that there will be jobs created at the site.</p>	
75	Strategy 15 - Intermodal Interchange	<p>Support expressed for the development of an interchange but highlights the increased concentration of trips on local routes around the interchange.</p> <p>Officer Commentary: Highway impacts will form part of detailed assessment work.</p>	
76	Exeter Science Park	No comments.	
77	Strategy 16 - Exeter Science Park	There was comment recognising need for the development but concern raised over potential impacts on M5 Junction 29 and A30.	

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		Officer Commentary: Highway impacts will form part of detailed assessment work, especially on planning applications.	
78	Exeter International Airport	Whilst there was support for airport expansion there was also concern expressed over the potential environmental impacts. Officer Commentary: The observations are noted. No changes proposed to the plan.	
79	Strategy 17 - Future Development of Exeter International Airport	There was a representation setting out that policy should be amended to recognise importance of airport expansion, support expansion of operational area to south east and support operations that do not require planning permission. There were, however, also concerns about airport expansion including respect of potential impacts on M5 Junction 29 and A30. Built heritage assets, including 2 nd World War structures were highlighted in responses. Officer Commentary: No changes proposed to the plan.	
80	Exeter Airport Business Park	No comments.	
81	Strategy 18 - Future Development of Exeter Airport Business Park	There was a representation of support for the business park but also one of opposition with concern expressed about an oversupply of employment land in the sub region. There was also concern in respect to potential impacts on built heritage features and potential impacts on M5 Junction 29 and A30. Officer Commentary: Comments noted but no changes proposed.	
82	Skypark Business Park	A respondent questions job numbers at Skypark and queries where the figures have come from and concern that Skypark Business Park does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. Officer Commentary: Comments noted but no changes proposed.	
83	Strategy 19 - Skypark Business Park	A response recognises need for the developments but raises concerns over potential impacts on M5 Junction 29 and A30. There was also a suggestion that Recycling site at Hill Barton/Greendale Barton should be relocated to rail head to reduce truck movements and be more "green". Officer Commentary: Comments noted but no changes proposed. It is not considered credible to seek/promote relocations.	
84	8. Axminster (Chapter)	There were mixed general responses to proposals for Axminster that included: <ul style="list-style-type: none"> • Objection to overall housing growth in Axminster, though also support expressed. • Consideration that there is a lack of infrastructure. • Vehicle traffic management measures need high consideration. • Proposals are not founded on credible evidence base, local community views have not been properly taken into account, scale of development unlikely to result in balanced growth, alternative strategies not properly considered. 	

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		<ul style="list-style-type: none"> • Objection to the Rodney Rendall Site on the Millwey Industrial Estate being given permission for residential development. • Objections but also support for allocated sites. <p>Officer Commentary: these comments were logged against policy title - see commentary below for text specific matters.</p>	
85	Our vision for Axminster is one of:	<p>There mixed responses to this section which included:</p> <ul style="list-style-type: none"> • Does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. • Object to paragraph which implies Axminster is seeking growth in order to secure a Relief Road • Objection to the translation of the vision for Axminster in to plan policy <p>Officer Commentary: Whilst comments are noted only a minor change is proposed to the vision.</p>	Minor change to vision to refer to north south relief road provision.
86	Axminster Now	<p>Objection to the plan references to no capacity for extra food store provision in Axminster with a view that provision in the town centre should be acceptable. The plan comments reflect the retail study and would unlikely to be grounds to oppose town centre investment.</p>	Minor change to text in reference to food store capacity.
87	Axminster: The Future	<p>There were mixed responses to proposals for Axminster that covered such matters as support and opposition for such issues as scale and sites for new housing, need and affordability of the relief road, flooding concerns in the town and references to the AONB.</p> <p>Officer Commentary: Whilst comments are noted only a minor change is proposed.</p>	Minor change to text in respect of AONB.
88	Strategy 20 - Development at Axminster	<p>There were responses in respect of Axminster that considered too much development was provided for/allocated to the town and a limited that considered there to be an under-development. A number of responses commented on the issue of a relief road for the town with some questioning need and another wishing to see a greater commitment to provision. There were also responses that wish to emphasise the greater importance should be attached to the natural environment (esp AONB setting) and also to matters of built heritage.</p> <p>Officer Commentary: The levels of development proposed reflect local community aspirations and wishes.</p>	
89	Strategy 20 - Cloakham Lawns site	<p>The Cloakham Lawns allocation received a number of objections addressing matters such as environmental impact and flooding concerns.</p> <p>Officer Commentary: This site has a planning permission for development but at the time of writing this report the permission was the subject of an ongoing legal challenge. No changes proposed</p>	
90	Strategy 20 - North and East of Town site	<p>There was support and also opposition to development to the north and east of the town. On matters of detail objection was made to employment provision requirements, and also support for an opposition to a relief road relief road the view that policy for road provision should be more flexible.</p> <p>Officer Commentary: policy broadly seen as appropriate.</p>	Minor change to text to clarify that the 8 Hectares employment figure includes land for the school.

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91	9. Budleigh Salterton (Chapter)	No representations logged.	
92	Our vision of Budleigh Salterton is one of:	No representations logged.	
93	Budleigh Salterton Now	It was commented that demographic information in Budleigh Salterton Chapter is incorrect. Officer Commentary: up to date data is quoted.	
94	Budleigh Salterton: The Future	No representations logged	
95	Strategy 21 - Budleigh Salterton	There were few comments on strategic policy for Budleigh Salterton though the view was expressed that Exmouth Road, Moorlands Road and Lansdowne Road should be within the Built-up Area Boundary (though exclusion also gained support). It was considered that the map should be clearer in showing that the whole town is within the AONB. Officer Commentary: No changes proposed but in final printing we will seek to improve clarity of mapping/colour contrasts.	
96	10. Exmouth (Chapter)	Concern that proposals overall are not in the interest of the town and also that there is under-development proposed for the town. Officer Commentary: No changes proposed.	
97	Our vision for Exmouth is one of:	A respondent considered the vision provides no inspiration, is inadequate, bears no relation to the plans proposals and does not reflect current schemes being promoted. Officer Commentary: No changes proposed.	
98	Exmouth Now	Comments received on matters of detail (on matters such as hotels, schools and supermarket provision) in text though one respondent considered that statement 10.3 gives a false impression - there is nothing wrong with people commuting from Exmouth to work in Exeter. Officer Commentary: Whilst people may choose to commute it is desirable to provide opportunities/potential so they do not have to or have the choice. No changes proposed other than in respect of reference to education provision.	Change in reference to education provision.
99	Future Development in Exmouth	Respondents commented on a number of matters of detail in the text – including in respect of care and extra care housing provision, Dinan Way completion, enhanced public transport links to Exeter, Objection to the potential for a new supermarket development adjoining the waterfront and that over-development in Exmouth will undermine the remaining assets. Officer Commentary: No changes proposed.	

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100	The Exmouth Seafront, Masterplan and Regeneration Proposals	<p>A number of matters of detail were raised in comments, including:</p> <ul style="list-style-type: none"> • Objection to a supermarket on the seafront/rugby club; • General opposition to regeneration proposals; • Lack of full and adequate provision / allocation for a transport interchange in Exmouth and road transport given too much priority • Flood risk concerns not fully covered; • Object to a budget hotel on Elizabeth Hall site; • Former Gas Works on Union Street should be sorted out as a priority; • Objection to proposals for the development of the Exmouth Waterfront as part of the Exmouth Splash initiative • Concern that the Exmouth Masterplan has not yet had a Habitat Regulation Assessment conducted on it. Suggests it is made clear in the text that this is necessary. <p>Officer Commentary: No changes proposed.</p>	
101	Strategy 22 - Development at Exmouth	<p>Amongst the comments on the strategy 22 as a whole were the following:</p> <ul style="list-style-type: none"> • Text should refer directly to, and fully recognise the importance of tourism to Exmouth and the wider area. • Concern in respect of over-development especially in the waterfront areas. • Concern that insufficient development is proposed in the town (it is flagged up that Exmouth has comparatively little new development given its size). • Conservation and enjoyment of the historic environment not fully addressed. • Completion of Dinan Way was seen as critical but also opposition was raised. • Land for primary school should be secured at Goodmores Farm allocation. • Need to protect existing open space for recreation needs. • Need to encourage the development of cycle routes within and from Exmouth. • Assessment of impacts on surface water flooding and sewerage capacity are needed. • Allocations sites proposed in the plan received objection and support and also a number of respondents promoted alternative/additional sites for development. • Pebblebed Heaths and Exe Estuary are habitats vulnerable to recreational disturbance. Increased development nearby will increase recreational disturbance. Adequate mitigation methods and/or alternative SANGS need to be provided. <p>Officer Commentary: Provision of habitat mitigation measures is seen as the critical concern and text is amended to provide for new green recreation space provision.</p>	<p>Amendments added in respect of:</p> <ul style="list-style-type: none"> • Clarifying location for School provision. • Improved walking and cycling routes and habitat mitigation through new/improved open space provision.
102	Strategy 22 - Development at Exmouth - Goodmores Farm site	<p>There were comments of support and objection to Goodmores Farm allocation and concern raised in respect of the potential facilities to be located in the allocation. Comment was also made that site development would cause flooding concerns.</p> <p>Officer Commentary: No changes proposed.</p>	

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103	Strategy 22 - Development at Exmouth - Liverton Business Park sites	<p>A respondent sought more detail of potential development.</p> <p>Officer Commentary: Minor change proposed to clarify extent of employment allocation.</p>	Change to clarify extent of employment allocation.
104	Strategy 22 - Development at Exmouth - Littleham Plumb Park site	<p>There was support for and also opposition to the Plumb Park site. Issues raised in objections included:</p> <ul style="list-style-type: none"> • traffic congestion and local road network capacity; • sewage capacity; • Infrastructure such as GP surgeries and schools will be stretched flooding; • not using Brownfield land; • lack of public support; • environmental impacts; • adverse landscape impacts; • Proposal is for a densely populated housing estate; • agricultural land loss; • No need for housing allocation due to number of empty homes; • Objection to Plumb Park site as site is prone to flooding; • Lack of affordable homes; • Developer putting profit before people; • Inadequate protection being afforded to retention of Donkey Hill as an open space. <p>Officer Commentary: This site now has a resolution to grant planning permission – no changes proposed.</p>	
105	Strategy 22 - Development at Exmouth - Waterfront Redevelopment Sites	<p>There were a number of concerns raised in respect to the Exmouth Waterfront proposals and the way these are covered in plan policy, these included:</p> <ul style="list-style-type: none"> • Objection to the Exmouth Splash proposals on account of not meeting tourism needs and expectations or enhancing quality of the beachfront. • Plan needs more information to explain what is proposed. • Objection to low quality development being promoted on the Exmouth Waterfront. • Redevelopment sites proposals do not do not accord with public wishes and schemes motivated by desire for commercial returns. <p>Officer Commentary: Scheme details feature in the regeneration proposals and they are being progressed in parallel with the local plan. No changes are proposed.</p>	
106	11. Honiton (Chapter)	<p>There was objection to what was seen as only modest growth being proposed for the town. The objections came from developer interests seeking to promote sites for residential development. No changes are considered necessary.</p> <p>Officer Commentary: No change necessary.</p>	No change necessary

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107	Our vision for Honiton is:	<p>Objection to modest growth reiterated and the view expressed that the vision for Honiton in the Local Plan is artificially skewed and one is tempted to wonder if this is because of the desire of EDDC rulers to move to Honiton.</p> <p>Officer Commentary: Objections relate to identification of a reserve site for housing rather than an allocation. This approach was agreed to enable opportunities for redevelopment to come forward within the town's Built Up Area Boundary in line with the approach advocated by the Town Council. Monitoring records indicate that only 13 dwellings were built within the BUAB for Honiton between 01/04/2012 and 31/03/2013 (net completions), although planning permissions for a net increase of 76 dwellings were granted in the same period. The plan refers to assessing the evidence after 2016, which would enable sufficient time to bring the site forward and develop it within the plan period if necessary. No changes proposed.</p>	
108	Honiton Now	<p>Objection to the plan was raised for not advising that there is significant additional capacity for food and non-food shopping in Honiton. No evidence has been submitted in support of this representation.</p> <p>Officer Commentary: No change necessary.</p>	No change required
109	Honiton: The Future	<p>Comments made included:</p> <ul style="list-style-type: none"> • Objection to the failure of the plan to provide for the town garden; • Objection to evidence of need for or means to provide for 15 hectares of employment land west of Hayne Lane, considered that provision should be commensurate with proposed housing growth; • Objects to development at Beggars Lane, Honiton, and considers it should be allotments; <p>Officer Commentary: Key responses comments are:</p> <ul style="list-style-type: none"> ○ Planning permission for part of the site covered by the 'Land North and South of Chapel Street Development Brief' was granted in 2012 without provision for a town garden due to viability issues and the benefits of redeveloping derelict land. However it may prove possible to incorporate a town garden into a different part of the site and a reference to the development brief in the local plan is considered to be appropriate, although some changes to the wording to reflect the limited status of Supplementary Planning Guidance are recommended. ○ The 15 hectares of employment land at Honiton reflects its strategic location, the vision to secure indigenous employment growth and inward investment and the high infrastructure costs that make a smaller allocation less viable. ○ No development is proposed at Beggars Lane (it was a proposed housing allocation in the adopted Local Plan) although the proposals map indicates a 'recreation area, allotment, accessible open space' in error and this should be removed from the proposals map. The land is in private ownership and has not been brought forward for development despite the residential allocation in the adopted plan. ○ Text in paragraph 11.3 that states 'The agents for the majority landowner have stated that an employment allocation on this scale would be independently viable' would benefit from re-wording. The viability work was undertaken in 2011 and the contributing factors are very complex. Suggest that this sentence is struck out. 	Very minor changes to text in paras 11.3 and 11.7.

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110	Strategy 23 - Development at Honiton	<p>Issues raised in general comment on policy included:</p> <ul style="list-style-type: none"> • Considered more logical to promote housing restraint than accept past commuting patterns; • Representations also received promoting greater development at the town with sites promoted to accommodate this development; • Object to failure of the plan to promote Bradford's builders yard for mixed use redevelopment with transport interchange; • Welcome developer funded improvements to Turks Head; • Consideration should be given to new railway west of Honiton in context of developing additional local stopping train; • Objects to development at Honiton (in Gittisham) on landscape, historical importance and scientific importance grounds; • Highlights of the potential impacts of development at Honiton on the A30 and A35. • Objection raised to the quality of bus links between Honiton and Exeter. <p>Officer Commentary: Key responses comments are:</p> <ul style="list-style-type: none"> ○ Development levels for Honiton were determined following extensive consultation and are considered to be 'sound'. ○ A policy for redevelopment of Bradford's Yard for mixed use including improved transport interchange facilities was included in the adopted Local Plan. No scheme has been progressed and there is no evidence that the scheme would be delivered in the new plan. Policies in the plan would not prevent the site being brought forward. ○ The suggestion of an additional railway station at Honiton has not been raised at previous consultation stages and the County Council has yet to identify a preferred location for the station. It would be difficult to justify a change to the plan in these circumstances and such a significant change would require additional consultation. 	References to improved cycle/pedestrian links added.
111	Strategy 23 - Development at Honiton - Ottery Moor Lane sites	<p>Whilst there was support for development at Ottery Moor Lane there were also views expressed:</p> <ul style="list-style-type: none"> • that employment uses should not be lost; • a mixed use scheme would be more appropriate; and that part of the site development would result in loss/impacts on significant trees. <p>Officer Commentary: The purely residential scheme was proposed by the Development Management Committee at its Special Meeting on 17/07/2013. There is a group of trees to the North East of the site protected by a Tree Preservation Order that will constrain the development potential of the northern allocation (site E164). However, in this urban location where relatively high densities are acceptable in principal an allocation for 150 is considered reasonable (applying the SHLAA methodology at a density of 50 dwgs/ha to sites E321 and E322 alone shows a capacity of 130 dwellings and in more urban areas such as this the methodology makes provision for densities of between 51 to 100 dwgs/ha).</p>	Reference added to cycling and walking links
112	Strategy 23 - Development at Honiton - West of Hayne Lane Employment Site	<p>Objection is raised to the allocation of West of Hayne Lane site for employment uses as it is seen as too big and not needed and evidence does not show that it is a viable site.</p> <p>Officer Commentary: The 15 hectares of employment land at Honiton reflects its strategic location, the vision to secure indigenous employment growth and inward investment and the high infrastructure costs that make a smaller allocation less viable. Evidence of viability has been submitted on behalf of the major land owner. No changes required.</p>	

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113	Strategy 23 - Development at Honiton - Reserve housing site West of Hayne Lane	<p>There were a number of objections to the reserve housing site West of Hayne Lane in Honiton. Issues raised included the view that it is not seen as needed and is inappropriate for development and no triggers are identified to show when it would come forward.</p> <p>Officer Commentary: With the exception of the Ottery Moor Lane sites, which are proposed as strategic allocations, there is no evidence that developable sites are available within the existing urban area. The reserve site is essential to the plans flexibility to meet the housing growth set out for Honiton. The trigger is a review following the 2011 to 2016 to assess the supply of housing land. No changes required.</p>	
114	12. Ottery St Mary (Chapter)	<p>There were general comments on Ottery in support of as well as opposing levels of development.</p> <p>Officer Commentary: No changes required.</p>	
115	Our vision for Ottery St Mary is one of:	<p>Comments raised on the vision included:</p> <ul style="list-style-type: none"> • does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment; • it is without any evidence and is a spurious vision from La-La Land. On what grounds is it asserted that the town centre will become "more vibrant" if you build more houses? • Objection that the plan does not set out the positive things that Council will do for Ottery and concern raised about the impacts of the new supermarket and that new development has not helped the town. Considered that there is an over-provision of development; • Description of growth is not moderate and the vision should be changed to reflect on green tourism and Brownfield development; • Would be useful to state that Cutler Hammer is a 'priority Brownfield site'; • Level of growth for Ottery St Mary should be increased. <p>Officer Commentary: Whilst comments are noted no changes are seen as required.</p>	
116	Ottery St Mary Now	<p>Issues raised included:</p> <ul style="list-style-type: none"> • The plan should recognise existing pressure on primary school places locally and within surrounding area; • Objection raised to the manner in which proposals for Ottery St Mary have been formulated and the view that a southern bypass and better footpaths in the town are needed and development could be on the southern side of the town; • concerns about Ottery sewage treatment plant already being at capacity. Calls on improvements to the sewage works by the time housing development is completed. <p>Officer Commentary: In response it should be noted that:</p> <ul style="list-style-type: none"> ○ School places will be addressed through the Infrastructure Delivery Plan ○ Sewage capacity constraints should be addressed through the Infrastructure Delivery Plan. 	Reference to pressure on local primary schools added
117	Ottery St Mary: The Future	Representations included that the plan:	

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		<ul style="list-style-type: none"> • Does not provide for enough housing at the factory site/it has capacity to take more than 100 homes and concern that the community uses at the site may not be viable; • Objection expressed that the plan does not specify what facilities will be provided for the town and the view expressed that there is no potential for a new library at the Cuttler Hammer factory site. • Correct cycle path title is 'Feniton to Ottery to Tipton St John to Sidmouth Cycleway'; • Paragraph 12.5 should be redrafted it asserts that the town will be enhanced. <p>Officer Commentary: Whilst the comments are noted no changes are proposed.</p>	
118	Strategy 24 - Development at Ottery St Mary	<p>Comments on policy included that:</p> <ul style="list-style-type: none"> • Considered that more development at Ottery St Mary is necessary; • Conversely, however, there was the view that there is too much development planned at the town – with impacts on commuting and new development not meeting local needs; • Need to recognise that further development will generate needs for extra school places; • Over-provision of employment land is made in the town; • Objection that Cuttler Hammer Factory redevelopment is not prioritised over other sites; • Considered that King's School is running at over-capacity already. Concerns as to where children in new housing developments will go to school; • Objection raised to development on the western side of the town with the southern side promoted as the favoured option and also proposals for a southern by-pass for the town; • Objection to allocation of the Island Farm Site as it would result in over-provision of housing land and place an unacceptable strain on facilities in the town; • Town centre Infrastructure needs to be improved but focus should be on non-car users. <p>Officer Commentary: Whilst the comments are noted only minor changes are proposed reflecting the fact that resolution to grant permission has now been granted at Island Farm.</p>	
119	Strategy 24 - Development at Ottery St Mary - Island Farm Site	<p>Objection raised to the allocation of land at Island Farm Site on the basis that an additional 200 new homes and additional employment land in the town is not required.</p> <p>Officer Commentary: It should be noted that Island Farm site has a resolution to grant planning permission.</p>	Employment provision at Island farm has been deleted as the site has permission and now securing 2 hectares of employment uses is improbable.
120	13. Seaton (Chapter)	<p>Three objections were received - one asking that Tracey's Field should be recognised as Land of Local Amenity Importance, and two relating to Seaton quay - the first querying need for EIA, asking that EDDC consider allocating a Special Regeneration Allocation and take account of special viability issues e.g. flood works making affordable housing less viable and the other objecting to failure to allocate Seaton Quay as a Special Regeneration Allocation and noting its importance in helping deliver the regeneration area.</p>	

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		<p>Officer Commentary: No changes are proposed though comments are noted.</p>	
121	Our vision for Seaton is one of:	<p>One respondent supports the vision. One objector points out that Seaton and the Axe Marshes have a very rich heritage of archaeology and historic landscape character with strong potential for GI links. Leisure East Devon evidence shows a residents' dissatisfaction with the totally inadequate leisure provision in Seaton. They state EDDC should consider how to address this as a matter of urgency.</p> <p>Officer Commentary: No changes are proposed though comments are noted.</p>	
122	Seaton Now	<p>One objector points out that Seaton and the Axe Marshes have a very rich heritage of archaeology and historic landscape character with strong potential for GI links. One response queries the demographics for the town.</p> <p>Officer Commentary: No changes are proposed though comments are noted.</p>	
123	Seaton: The Future	<p>Four respondents commented on the Future of Seaton. One supports the vision but is concerned that the Strategic Land Allocations at Seaton, may jeopardise it. Two objections relate to development being allowed beyond BUABs if not considered significant and suggest amending para .13.6 to locate all 150 houses within the existing town. One objection to allocation of land east of Harepath Road as it cuts heavily into the green wedge between Seaton and Colyford. If it must be used it should be for industrial or recreational purposes and certainly not for housing.</p> <p>Officer Commentary: No changes are proposed though comments are noted.</p>	
124	Strategy 25 - Development at Seaton	<p>Numerous objections were received. These relate to a diverse range of issues but primarily the concern is that excessive housing and employment is proposed, supported by inadequate facilities (particularly health and recreation). A number of suggestions were put forward as to how housing could be accommodated within the town, for instance providing around 200 new homes on the campsite/football club and moving those to LSe1, with Clay Common being suggested as a better 'reserve' site/housing outside the BUAB, particularly in the green wedge, should be resisted.</p> <p>One objector points out that Seaton and the Axe Marshes have a very rich heritage of archaeology and historic landscape character with strong potential for GI links. Concern related to loss of green/open space and biodiversity and need to promote Seaton as a tourist destination-focussing on green tourism. Better tourist facilities and the Jurassic centre are needed. It was also considered that plans should better reflect employment allocations and define them spatially.</p> <p>Officer Commentary: It is recognised that the 'Natural Seaton brand should be more fully reflected in policy wording.</p>	Include reference to promotion of green tourism and 'natural Seaton'.
125	Strategy 25 - Development at Seaton - North of Harepath Rd Mixed Use Employment Site	<p>One objection to expansion/allocation of the North of Harepath Rd Mixed Use Employment Site</p> <p>2 suggestions that consideration could be given at the Harepath Road sites to a modest increase in the number of new homes proposed from 50 to 70 to include the affordable homes requirement</p> <p>Officer Commentary: No changes are proposed though comments are noted.</p>	

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126	Strategy 25 - Development at Seaton - Seaton Regeneration Site	<p>Two representations supporting the intensification of housing at the regeneration site were received, provided it does not compromise the mixed use elements of commercial, tourism and open space.</p> <p>Officer Commentary: No changes are proposed though comments are noted.</p>	
127	Strategy 25 - Development at Seaton - Reserve Mixed Use Site	<p>Five objections to the reserve site were received. All object to the erosion of the green wedge and use for housing. Some would support open space/recreation/employment.</p> <p>Officer Commentary: No changes are proposed though comments are noted.</p>	
128	14. Sidmouth (Chapter)	<p>The proposals for development at Sidmouth generated the greatest numbers of respondent comments. Around 600 respondents objected to policy provision for Sidmouth/sites allocated in the plan. The vast majority of respondents were opposed to policy and land allocations and specifically:</p> <ol style="list-style-type: none"> 1. The allocation of land at Sidford for employment/job generating uses; and/or 2. The allocation of land at the Knowle for residential development. <p>Officer Commentary: No changes are proposed to this RefPoint but see comments below.</p>	
129	Our vision of Sidmouth is one of:	<p>Matters raised in representations that are directly relevant to the vision included:</p> <ul style="list-style-type: none"> • Objection that plan proposals are not evidenced based; • Objection to only referring to conserving the regency grandeur of the town and failing to recognise the other import periods of development but notably Georgian. Considered it should be historical grandeur that is protected; • Whilst the vision for Sidmouth is not challenge objection is raised in the way in which this vision is translated into policy, explicitly in respect of the allocation of allocation of employment land at Sidford; • Objects to vision for Sidmouth - 380 jobs should be retained at The Knowle and proposed employment land at Sidford should be shelved; • Considered that up to (not more than) 50 homes should be built in Sidmouth and the Knowle park and ride site retained for this use; • The Drill Hall site should be use as a community building; • Objection that plan proposes too much growth for Sidmouth and should seek modest employment and limited housing growth to meet locally generated needs with the objective of retaining and consolidating the existing qualities and character of the town. <p>Officer Commentary: Comments below cover a number of the issues raised though it is agreed that reference should be to historical grandeur. Also deletion of text will clarify ambiguity between this section and text elsewhere in the policy.</p>	Reference made to 'historical grandeur' and last sentence amended to remove ambiguity between vision and rest of chapter text.
130	Sidmouth Now	<p>In respect of 'Sidmouth Now' the following matters were raised:</p> <ul style="list-style-type: none"> • Disagreement with Demographics used in the Sidmouth Chapter; • Highlighted that the AONB abuts to the east, north and west – the sea is to the south; • The figures for Sidmouth Housing Needs have not been identified with respect to Sidmouth as a local entity rather than an indistinguishable part of East Devon; 	Amendment in respect of AONB location.

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		<ul style="list-style-type: none"> • No need for the size of the new employment proposed; • Park and change should be scrapped; • For Sidmouth the plan should read that "Attractive hilly and mixed arable and wooded countryside falling in the East Devon Area of Outstanding Natural Beauty abuts the eastern, northern, western and south western sides of the town". <p>Officer Commentary: whilst comments are noted no changes are proposed, bar in respect of reference to AONB location.</p>	
131	Sidmouth: The Future	<p>With respect to Sidmouth: The Future comments raised included:</p> <ul style="list-style-type: none"> • Proposals for Sidmouth will impact on tourism and recreation; • Current boundaries are defensible and should not be changed; • Include reference to need to manage surface water run off to avoid flooding Sidmouth Town Centre • Support for policy as need for additional housing and care for elderly retired residents of Sidmouth • Objection raised to the scale of the housing growth proposed for Sidmouth and the loss of existing employment sites and allocation of a new site; • Objection to insufficient reference to environmental protection for the town; • Support for employment site at Alexandra Road and support for improved highway access; • Objection to the strategic approach to development in Sidmouth including in respect of development of the Knowle and Sidford employment site and failure to plan for community needs at Port Royal site; • supports vision but necessary improvements to infrastructure should be carried out before additional housing is approved; • Considered that the need for non B Class uses 'employment' land should be treated with caution. <p>Officer Commentary: Comments are noted but no changes are proposed.</p>	
132	Access to Alexandria Industrial Estate in Sidmouth	<p>There was general support for plan reference to improved access to Alexandria Industrial Estate. But respondents comments included:</p> <ul style="list-style-type: none"> • the plan does not fully promote the potential at the Alexandria Industrial Estate in Sidmouth as the appropriate alternative to Sidford; • Alexandria Industrial Estate should be developed to its full potential as it has previously been capable of providing employment to over 200 employees; • Suggestion of need for a roundabout on Bulverton Road; • EDDC should do far more than "support" the construction of a new access road to the Alexandria Estate. It should take all steps necessary to ensure that such a road is constructed. <p>Officer Commentary: Comments are noted; no changes are proposed.</p>	

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133	Strategy 26 - Development at Sidmouth	<p>All of the Proposed Allocations for Sidmouth came in for objection. A number of respondents considered there to be an oversupply of employment land and that nil or little provision was needed or appropriate and would result in-commuting. Means for calculating land supply were questioned as was the influence of the East Devon Business Forum. It was considered that we should reuse vacant buildings. Some respondents were also of the view that it was reasonable for people to commute from Sidmouth to jobs elsewhere and that with a retired population there should be less onus on new jobs and that development would adversely impact on jobs in tourism.</p> <p>There was also objection to an over-supply of housing land with some considering that there was no need for housing allocations and that provision should be met through windfalls. Respondents questioned infrastructure capacity to support new homes a some considered that there should be a greater emphasis on affordable housing provision.</p> <p>Site specific comments included:</p> <p>Sidford employment site:</p> <ul style="list-style-type: none"> • Traffic impacts and congestion; • landscape harm- esp to AONB – in representation it was not considered that the Landscape Character Assessment justified site choice; • sewage smell; • development in a floodplain; • inadequate highway access; • being contrary to local wishes and inadequate consultation; • pedestrian & cyclist safety, • Sidbury Bridge is weak, <p>Manstone Depot:</p> <ul style="list-style-type: none"> • Should be retained for employment uses; <p>Port Royal Site:</p> <p>Some respondents considered this to offer potential for housing development but it was commented that the site should be redeveloped for community uses/mixed use scheme.</p> <p>Knowle – Council Offices Site:</p> <ul style="list-style-type: none"> • loss of Knowle parkland and illegality of building on parks; • Loss of an Employment use/site; • Traffic impacts; • Care home opposed; • Older part of the Knowle could be converted into apartments; 	<p>Minor amendments are proposed to the Sidmouth strategy policy.</p> <p>These are in respect of:</p> <ul style="list-style-type: none"> • clarifying policy intent and phasing of the Sidford employment site; • clarifying issues surrounding potential for park and ride; and • including reference to environmental considerations at/around Sidmouth. <p>Also the land allocation at the Knowle for housing is shown to cover the footprint and immediately abutting land of the Council office building, the poly—tunnel/garden maintenance area and the middle and top car parks.</p>

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		<ul style="list-style-type: none"> • Objection to failure of plan to refer to relocation of Council Offices to Honiton; <p>There was, however, representation that not enough development was being proposed for Sidmouth and additional / alternative sites were proposed at:</p> <ul style="list-style-type: none"> • Woolbrook opposite the new Persimmon houses. • At Sidford garden centre; • Adjacent to the Byes. <p>Amongst other points raised were:</p> <ul style="list-style-type: none"> • Calls for a new strategy to address coastal management at Salcombe Hill Cliffs; <p>Officer Commentary: Whilst the scale and nature of opposition to proposals is noted (and recognition is given that some support Sidmouth proposals) the development proposed for the town has gone through extensive past consultation and consideration and policies and allocations are regarded as appropriate. Minor changes are however proposed to policy as detailed in the column to the right.</p>	
134	15. Smaller Towns, Villages and Countryside (Chapter)	<p>Amongst the general issues raised on this chapter were the following:</p> <ul style="list-style-type: none"> • Objection that plan for rural areas is not based on comparative sustainability review of rural communities and that under such an approach settlements close to Exeter should take greater growth; • Support recognition given to the Importance of agriculture in the local economy and for rural businesses; • Noted by Community Council of Devon that a small amount of development is needed to promote sustainable and dynamic rural communities. <p>Officer Commentary: Comments are noted but no changes are proposed.</p>	
135	Our vision for smaller towns, villages and the countryside is one of:	<p>Comments on the vision included the suggestion that the vision needs to be better balanced to highlight the importance of social wellbeing (plan changed to reflect this), an objection to the vision being inappropriately restrictive towards development in smaller towns, villages and the countryside and a desire to ensure contained, sensitive development of new dwellings that will not impinge on village character.</p> <p>Officer Commentary: Comments are noted and change proposed to highlight the importance of social wellbeing.</p>	Changed to highlight the importance of social wellbeing
136	Ensuring Vibrant Rural Areas	<p>Comments were diverse, with some respondents feeling that the approach is too restrictive and greater growth is appropriate and should not be restricted to settlements with Built up Area Boundaries, whilst others felt that rural development should be strongly resisted. There was a general feeling that quality design is important and 'sense of place' and that more housing for elderly persons should be provided to enable them to stay in their villages.</p> <p>Officer Commentary: Comments are noted but no changes are proposed.</p>	
137	Jobs in Rural Areas	<p>A response considered that Employment opportunities in villages should be nurtured and encouraged noting that jobs can be poorly paid and part time. However the view was also expressed that assessment of how the employment market works is incorrect. Jobs should be focused in urban centres to reduce reliance on the car.</p>	

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		Officer Commentary: Comments are noted but no changes are proposed.	
138	Housing in Rural Areas	<p>A respondent considered that plan should be amended to include reference to Local Letting Plans and local connections may need to be given more weight than need. More effort should be go into encouraging elderly people to move from bigger to smaller homes. A respondent also offered support for policy aim of providing innovative ways of meeting need for affordable housing in rural areas, but questioned degree to which policies are worded to deliver this.</p> <p>Officer Commentary: Comments are noted but no changes are proposed.</p>	
139	Social and Community Facilities in Rural Areas	<p>Objection to the examples of community facilities excluding 'places of worship'.</p> <p>Officer Commentary: Comments noted and see proposed change.</p>	Include 'places of worship' as community facilities
140	Infrastructure in Rural Areas	No comments logged.	
141	Development at Small Towns and Villages of East Devon	<p>Comments received included objection to the housing allocations strategy in the villages on the basis that the threshold of 5 is too high, site selection process is flawed, 5% figure is arbitrary and does not reflect local need. Objections also relate to overprovision at villages - Cranbrook was supposed to avoid the need for rural development- and vulnerability of additional SHLAA sites on village edges.</p> <p>Officer Commentary: The provision of housing followed extensive engagement on the local plan and strikes a balance between ensuring new houses can be built and population remain at least static (on average/typically) and also ensuring local community aspirations can be met. Local communities were invited to propose greater house building if they deemed this desirability and can also promote this approach through Neighbourhood Plans. No changes are proposed.</p>	
142	Strategy 27 - Development at the Small Towns and Larger Villages	<p>A wide range of comments were received on this policy including representations promoting identified sites for development purposes and objection to the plan not allocating sites for development in villages, there were also objections to specific proposals being promoted by others. A number of respondents highlighted specific villages that they considered to be appropriate for higher levels of development than those advocated in plan policy. There were several requests for village audits and allocations tailored to village facilities/needs.</p> <p>Objectors requested clarification of the exceptions policy and whether exceptions housing would count towards village numbers. Also, how villages without Boundaries would accommodate housing.</p> <p>Objection was made to the lack of reference to the importance of local landscape/AONB and the need to preserve it (the Plan has been amended to reflect this).</p> <p>Objection was made to the reference to all villages with BUAB's having reasonable access to public transport. It was pointed out that, whilst a bus service runs through the Parish and is accessible to residents of Tytherleigh, Chardstock village and outlying hamlets do not have access to it. Plan changed to 'most' villages rather than all.</p>	Plan to refer to the importance of rural landscapes and 'most' villages having public transport

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		<p>West Dorset District Council objected on the basis that provision should be made for the growth of Lyme Regis within East Devon's administrative boundary and to the contradictory nature of Strategies 7, 27 and 35 with Neighbourhood Planning. They would not allow a neighbourhood plan to bring forward housing on the edge of Lyme Regis in East Devon District.</p> <p>Officer Commentary: Comments are noted with minor changes proposed as detailed in the right hand column.</p>	
143	Affordable Housing in Rural Areas	<p>A respondent commented that there is a pressing need for affordable housing and that in rural areas like Woodbury 'this will mainly be provided as a percentage of allocated housing on larger sites.</p> <p>Officer Commentary: Comment noted but no changes are proposed.</p>	
144	The Open Countryside of East Devon and the Smaller Villages and Hamlets	<p>A respondent commented that rural areas need housing growth as well as the towns - this should not just be restricted to affordable housing to support local needs. Also there was an objection that insufficient evidence and lack of community engagement has been used to inform proposed development at Smaller Villages and Hamlets.</p> <p>Officer Commentary: Comments are noted but no changes are proposed.</p>	
145	Agricultural and Other Rural Enterprises	No comments logged.	
146	Strategy 28 - Sustaining and Diversifying Rural Enterprises	<p>A respondent commented that re-use of rural buildings would be supported except where the proposed use or design would be incompatible with other sustainability issues - such as historic importance. Another respondent advised that policy would support wider organisation objectives.</p> <p>Officer Commentary: Comments are noted but no changes are proposed.</p>	
147	16. Thriving Communities (Chapter)	<p>Support was expressed.</p> <p>Officer Commentary: Comment noted.</p>	
148	Supporting and Encouraging Thriving Communities	<p>In respect of text on Supporting and Encouraging Thriving Communities a respondent questions how EDDC will support communities when faced with large developer interests? To date the EDDC response appears to have been poor and ill-coordinated. Elsewhere a respondent suggests a strategy is required setting out EDDC's support and assistance to communities wishing to produce Town/Parish Plans and another commentator suggests communities have little ability to influence planning decisions.</p> <p>Officer Commentary: Comments are noted but no changes are proposed.</p>	
149	Jobs and the Economy	Considered wording should refer to emerging Education Infrastructure Plan, 'with the potential for free schools and Academy status' should be removed, Academies should be in para 16.40, reference to early years needed.	

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		Officer Commentary: Comments are noted but no changes are proposed.	
150	Strategy 29 - Promoting Opportunities for Young People	An objection was raised that whilst the intent of this objective is understood it is unclear what developers will be required to do to implement it? Concern that it could be used to require developers to fund training and be in breach of CIL Reg 122. Respondents also suggested allocation of land to help deliver plan policy. Officer Commentary: Comments are noted but only a very minor change is proposed.	Minor change to text in respect to clarifying site size scale.
151	Stimulating Inward Investment, Connectivity and Local Procurement	No comments logged.	
152	Strategy 30 – Inward Investment, Communication Links and Local Procurement	Objection that whilst intent of this objective is understood it is unclear what developers will be required to do to implement it? Concern that it could be used to fund unspecified measures. This is likely to be in breach of CIL Regulation 122. Officer Commentary: This policy is seen as important in supporting the local economy and as such it is deemed appropriate to strengthen it. See proposed changes summarised in the column to the right.	Changes made to text to relate policy to ‘large-scale major’ developments and make reference to young people and those disadvantaged in the jobs market and targeted training, recruitment and supply chain agreements that may form part of a planning agreement.
153	Encourage Mixed-Use Development Incorporating Employment	No comments logged.	No changes proposed
154	Strategy 31 - Future Job and	Amongst comments received the following issues were highlighted:	Minor change to text to delete requirement for

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	Employment Land Provision	<ul style="list-style-type: none"> • Objection to policy seeking employment provision with housing developments as it will over-provide for employment need. • If it is decided to continue with the policy the type of employment expected should be restricted with reference to Class B1. • Objection that policy should focus on the allocation of land for employment uses. Not all sites that are suitable for housing will be suitable for employment. • Concern that one hectare of employment land for each 250 homes would appear not to be justified. • Specific concern over provision of employment in villages and potential for industrialisation. • Objection that the provision of jobs directly in association with homes should not apply to schemes at the West End (given major West End employment allocations). • Insufficient level of demand for the level of jobs the Council wants to see. <p>Officer Commentary: In respect of smaller developments it is recognised that it would often not be possible, or at least it would be very challenging (potentially including in legal terms), to require developer financial contributions (through a 106 agreement) for job provision directly in association with new housing. To be justified we would need sound evidence of identified local employment sites/proposals where money would be spent or at least evidence to demonstrate how/why such schemes would come forward (we do not have this evidence). In the absence of such schemes it is not seen as reasonable to include this aspect in the policy. On the basis of the off-site contribution choice under policy not appearing to be viable it would not seem appropriate to require the alternative requirement for provision to be directly on site. In past Committee consideration the choice of on-site only provision was rejected and it has come in for some respondent objection. Therefore in villages it is proposed that the employment provision requirements of policy are removed. However it may be possible for future policy documents to allocate mixed use employment and housing sites and such sites could come forward through Neighbourhood Plans. Also we retain policies to provide for employment uses in villages. The plan is proposed for change to reflect this consideration. This change would not impact on larger sites where on site provision remains a requirement.</p>	employment provision or 106 contribution on smaller scale housing sites.
155	Resisting the Loss of Employment Land	<p>A respondent advises that in a practical sense we fail to understand how will it be possible to provide an equivalent area nearby of replacement employment land.</p> <p>Officer Commentary: Comment noted but no change proposed.</p>	
156	Strategy 32 - Resisting Loss of Employment, Retail and Community Sites and Buildings	<p>Respondent comments included:</p> <ul style="list-style-type: none"> • wish to see policy extended/policy coverage to ensure that public houses both inside and outside of villages are not 'lost' to other uses; • To provide for housing policies should be created to manage the shrinkage of town centres in a controlled way - the retail properties being released being allowed for redevelopment as housing; • Objection that policy conflicts with the Government Policy set out in paragraph 51 of the NPPF which states that LPAs should normally approve planning applications where there is an identified need for additional housing in that area; • Suggests that Strategy 32 should also include a reference to resisting the loss of educational sites; 	

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		<ul style="list-style-type: none"> • There is a need to protect existing commercial properties from being converted into residential use. <p>Officer Commentary: Comment noted but no change proposed.</p>	
157	Promoting the Commercial Prosperity and Vibrancy of our Town Centres	<p>Comments received included that:</p> <ul style="list-style-type: none"> • Objection that policy does not seek to resist the loss of car parking to serve Town Centres; • Suggests that text needs to discourage change of use from retail/business to residential; • Objects to the fact that the problems of East Devon's town centres are not recognised. <p>Officer Commentary: Comment noted but no change proposed.</p>	
158	Tourism in East Devon	<p>Comments received included that:</p> <ul style="list-style-type: none"> • Whilst broadly supportive of policy Bourne Leisure consider supporting text to Strategy 33 should acknowledge/explain that on low density or less viable sites, in order to fund necessary improvements it may be necessary to increase the number of units. • The tourism section is very short, uninspiring, cliché-ridden and lacking in insight. Sidmouth chapter should focus more on tourism. • Concern expressed that scale of opposed housing growth and development on the edges of towns will adversely impact on the tourism appeal of the District and the tourism economy. Call for less houses to be built. <p>Officer Commentary: Comment noted but no change proposed.</p>	
159	Strategy 33 - Promotion of Tourism in East Devon	<p>Comments received included that:</p> <ul style="list-style-type: none"> • What about the historic environment - villages, towns, buildings, archaeology, human-made and managed landscapes that people mostly come to see; • Policy should promote greater investment in and promotion of green tourism; • Should be greater emphasis on Promotion of Tourism in East Devon; • There should be greater promotion of green tourism, cycle links across the District and recognition that inland as well as coastal areas have tourism potential; • Esp in respect of West End devt the respondent advises the whole tone of the plan needs to be changed, to emphasize the importance of preserving the unique and rural character of Devon and the environment and that to not do some will undermine tourism; • policy should recognise potential ecological harm from tourist attractions and policy changed to ensure all tourism developments are sustainable and don't damage natural assets. <p>Officer Commentary: Comment noted but no change proposed.</p>	
160	Affordable Homes	<p>General comments received included in principle support for affordable housing but concern expressed that it will not direct development to areas where affordable housing is needed with appropriate sites typically being close to</p>	<p>We are commissioning an off-site affordable housing contribution calculator and</p>

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		<p>employment and transport services. View also expressed that any contribution should find its way back to the local community. Viability issues should be fully visible to the Parish Councils/ local communities involved.</p> <p>Officer Commentary: Comment noted but no change proposed.</p>	reference is made in the text.
161	Strategy 34 - District Wide Affordable Housing Provision Targets	<p>There were site specific comments relating to this policy and more general matters raised included:</p> <ul style="list-style-type: none"> • The Local Plan ignores the inevitable impact of under-supply on affordability, and is contrary to the NPPF; • Many policies will increase future house prices by not providing enough land for development; • Objection to provision of affordable housing at levels of 50%. In a non grant funded regime levels of provision at 50% are only achievable on exceptional sites where land value is heavily discounted. • Provision should be made for Individual self build in larger gardens in rural areas or towns. Affordable housing should mingle with open market housing. • Objection - To expect affordable housing to be provided where there is a net gain of 1 dwg will potentially stifle smaller schemes. • A Policy target of 25% affordable housing should be set district wide. • Affordable housing threshold should be 15, otherwise schemes unviable. • Objection that the word minimum should be removed from the third line. It is totally unreasonable and unjustifiable to ask developers to undertake viability assessments to demonstrate that they can achieve a higher percentage. • Policy does not reflect patterns of local need or direct new affordable homes to the most appropriately locations. <p>Officer Commentary: Comments are noted and it is recognised that it would be unreasonable to expect all schemes in lower value areas to be accompanied with a viability assessment if they provide the required 25% affordable housing. In respect to percentages and threshold these are underpinned by viability evidence and testing and therefore are regarded as sound. However in conditions of market volatility, and especially downtown as has occurred in recent years, it is seen as appropriate to include some degree of flexibility into policy in respect of the of the tenure of affordable housing sought.</p>	<p>Minor changes to wording in respect of:</p> <ul style="list-style-type: none"> • Removing implied need for viability assessment on all schemes in lower value areas even when 25% provision is proposed. • Providing flexibility in respect of the affordable housing mix to reflect viability concerns.
162	Schemes for Mixed Market and Affordable Homes in Rural Areas	<p>Comments received included that:</p> <ul style="list-style-type: none"> • Objection to this proposal because it is 'Exception Housing' and that is bad planning. Village housing provision should be based on assessment of need. • Affordable housing should be integrated into existing settlement boundaries to avoid creating/contributing to social stigmas such as 'us ' and 'them'. There should be less design differences between affordable and market homes. • focus should be on providing affordable housing within the Built up Area Boundary • Affordable housing should be integrated into existing settlement boundaries to avoid creating/contributing to social stigmas such as 'us ' and 'them'. There should be less design differences between affordable and market homes. • Policy for Mixed Market and Affordable Homes in Rural Areas is not seen as necessary as policy requiring 50% affordable housing in rural areas on allocated sites will meet settlements needs for affordable housing <p>Officer Commentary: The plan is consistent with advice in the NPPF that local planning authorities should consider allowing some market housing to facilitate significant additional affordable housing (paragraph 54).</p>	Minor changes to wording in respect of settlements without a Built-up Area Boundary.

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163	Parish Groupings for Affordable Housing	<p>A respondent advises of objection that the affordable housing target should be reduced to 25% and only apply to schemes of 10 or more houses where Parish Councils do not want alternative community benefits.</p> <p>Officer Commentary: Viability evidence indicates that higher affordable housing targets for schemes with a net gain of one dwelling are realistic in large parts of East Devon, as reflected in the plan policies.</p>	
164	Strategy 35 - Mixed Market and Affordable Housing Outside Built-up Area Boundaries	<p>Comments received included:</p> <ul style="list-style-type: none"> • This strategy should be redrafted to preclude the building of affordable housing and mixed-market housing on sites outside built-up area boundaries where those sites lie inside the District's AONBs. • The representor supports the Council's proactive approach to bringing forward affordable housing but suggests additional flexibility could be added. • Agrees that affordable housing should remain affordable in the future. Believes EDDC will not be able to enforce 66% affordable. • Objection that in the absence of a five year land supply policy is redundant since all appropriately located housing should be approved. And wording is considered to be overly prescriptive and thresholds and percentages are inappropriate.. • Support cross subsidy housing but concerned about arbitrary 66% minimum - policy too restrictive and could prevent delivery of affordable housing in rural areas. 50% more deliverable. • Supports initiative for housing outside BUABs subject to proven local need. • Lympstone Parish Council notes and endorses the changes created by this policy. • policy should take account of site specific viability. • Objects to contradictory nature of Strategies 7, 27 and 35 with Neighbourhood Planning. They would not allow a neighbourhood plan to bring forward housing on the edge of Lyme Regis in East Devon District. <p>Officer Commentary: Comment noted and a change is proposed in respect of clarifying that provision can be outside of Built-up Area Boundaries.</p>	Minor changes to text to clarify provision can be outside of Built-up Area Boundaries.
165	Self Build Housing Schemes	<p>Comments received included:</p> <ul style="list-style-type: none"> • Objects to lack of policy reference to Self Build Housing Schemes for villages; • Objection to wording on self build housing schemes as it is unreasonable (and unlawful) to require developers of larges sites to operate in this way. It is yet another 'hidden residential tax'; • Consider - Self Build Housing Schemes is a very welcome addition to the local plan; • Support for Self Build Housing Schemes on small scales, provides opportunities for individual projects and community ownership and fast completions; <p>Officer Commentary: The NPPF requires local planning authorities to plan for people wishing to build their own homes. A specific reference to self build housing schemes for villages is not necessary – a large number of planning permissions in villages are individual plots likely to be available for self build. This section of the plan does not require developers to</p>	

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		do anything and the relevant policy (DM policy H2) encourages developers to make land available to self builders but does not require land to be given away at less than market value. No changes required	
166	Lifetime Homes and Housing for the Elderly and Disabled	No comments logged.	No changes required
167	Strategy 36 - Life time Homes and Care/Extra Care Homes	<p>Comments included:</p> <ul style="list-style-type: none"> • Life Time Homes planning obligation should be extended to some developments of less than ten dwellings. • Strongly supports this strategy and welcomes the recognition of the need to provide Care and Extra Care Home spaces. • No viability analysis is provided to support thresholds or underpin the assumptions made. • lifetime homes/extra care homes should be counted towards housing numbers. • Life time homes and extra care homes should not be in addition to allocations • Objection that there should not be a prescriptive requirement for 20% of market dwellings to be Lifetime Homes Standards. Rather the policy should merely encourage such provision. • Objections that the full extent of the need for Care/Extra Care Homes should be quantified and land should allocated for such purposes. <p>Officer Commentary: The NPPF requires local planning authorities to plan for a mix of housing to meet the needs of different people in the community, including older people and people with disabilities (paragraph 50). East Devon as a whole has a high proportion of residents over 60 years of age (36%) and this figure is higher in the coastal towns. The Strategic Housing Market Assessment provides evidence of the need for adapted housing in the wider housing market area. Many of the requirements stem from mobility issues associated with old age. The policy is considered to be a flexible approach to meeting the identified needs.</p>	Minor changes to text
168	Gypsy and Traveller Provision	<p>No comments logged.</p> <p>Officer Commentary: Do however see comments logged against Devt Mngt policy on Gypsies and Travellers. Policy amended to refer to new study being undertaken with other Devon Authorities to comply with NPPF.</p>	Policy amended to refer to new study being undertaken with other Devon Authorities to comply with NPPF
169	Community Facilities	<p>Provision of community facilities was supported (with a comment that it should be a main CIL priority) but a number of objections were received, mainly referring to the need for a strategy to provide additional, and protect existing, facilities. It was requested that community facilities be defined and that churches and other places of worship be included as an integral part of the network of community facilities and taken into account in planning for new development</p> <p>Officer Commentary: See proposed changes.</p>	A definition of community facilities as providing for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community was included.

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170	Education and Health	<p>A number of objections to this policy were received. In terms of education, it was suggested that CIL should subsidise school travel in rural areas, the plan needs to analyse and plan for new education provision (as advised by the NPPF) and provide clearer and more specific guidance on this subject if it is to be effective, land should be allocated for new schools, infrastructure and school places should be in place before development, the plan should distinguish between higher education and Access to Higher Education courses and also refer to the closure of St Clares Adult Education Centre in Seaton. Plan should include a developer funded new Colyton Grammar school access road and coach park.</p> <p>There was support for schools providing further education to the wider community.</p> <p>It was suggested that the Council should liaise with Health Authorities over the need for future development of community hospitals - some types of care provision can provide better value in the community.</p> <p>Officer Commentary: See proposed changes to reflect educations issues and especially the education Infrastructure Plan.</p>	Include reference to the education infrastructure plan and likely changes to pupil numbers (as requested by DCC)
171	Transport and Accessibility	<p>Two responses were received, one advising that whilst Feniton does have a railway station the services are poor and this does not make Feniton sustainable and the other saying that the main function of these paragraphs seems to be establish that rural communities are poorly served by Public Transport and will remain so.</p> <p>Officer Commentary: Comment noted but no change proposed.</p>	
172	Safe Communities and Minimising Crime	<p>Support expressed for section of plan on 'Safe Communities and Minimising Crime'</p> <p>Officer Commentary: Comment noted.</p>	
173	Strategy 37 - Community Safety	<p>Several responses were received. There was support for the Policy and objection on the basis that the Strategy is superfluous and could be included within an all embracing design led strategy/policy such as D1. The reference to "reducing crime and fear in the District" is inappropriate.</p> <p>Officer Commentary: Comment noted but no change proposed.</p>	
174	17. Climate Change and Renewable Energy (Chapter)	<p>Generally respondents were supportive of the Chapter although it was suggested that a separate strategy is required to deal with the serious surface and river flooding issues arising from climate change.</p> <p>Officer Commentary: Comment noted but no change proposed.</p>	
175	Climate Change and Low Carbon Development	<p>Some text changes were suggested in respect of climate change.</p> <p>Officer Commentary: changes incorporated into the Plan to reflect increasing weather changes arising from climate change.</p>	Plan changed to reflect increasing weather changes arising from climate change
176	Transition to a Low Carbon Economy	<p>Several representations were received. One supported the text, especially recognition of the different needs in rural areas. Objections were on the basis that: A detailed assessment of flooding/ drainage issues and measures to manage them should accompany every planning application. Plan should refer to rainwater harvesting. The Plan should set out</p>	

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		<p>the importance of sustainable development and highlight concerns that wind and solar power provide intermittent supply and that they may not add to positive sustainable outcomes. Standards should be increased.</p> <p>Officer Commentary: Comment noted but no change proposed.</p>	
177	Development that Minimises the Demand for Energy	<p>One objection was received on the basis that, if small developments are unlikely to have carbon reduction measures imposed on them when built, it is unlikely that this measure will be applied afterwards.</p> <p>Officer Commentary: Comment noted but no change proposed.</p>	
178	Strategy 38 - Sustainable Design and Construction	<p>Some support for this Policy was expressed (along with the view that requirements should be increased) and with the view that policy should apply to all new dwellings. Objections were received on the grounds that the Policy is too restrictive, exceeds national standards, will affect viability/deliverability and should be more flexible.</p> <p>Officer Commentary: Minor changes are proposed in respect of the request that the plan should advocate the integration of biodiversity enhancement measures within the fabric and design of new development and a reference to sustainable waste management.</p>	Minor changes advocate the integration of biodiversity enhancement measures in new development and a reference to sustainable waste management.
179	Renewable and Decentralised Energy	<p>One response was received and the Plan has been amended to refer to current best practice.</p> <p>Officer Commentary: Change proposed in response to comment.</p>	Include reference to current best practice
180	Strategy 39 - Renewable and Low Carbon Energy Projects	<p>Several responses were received, in general they supported the thrust of policy but some requested text amendments to strengthen it. Opposition was made to large scale wind and solar technology with small scale, local solutions being preferred. It was requested that the text be amended to refer to current best practice.</p> <p>Officer Commentary: Change proposed in response to comment.</p>	Include reference to current best practice
181	Strategy 40 - Decentralised Energy Networks	<p>Several objections were received. These felt that there was insufficient evidence to justify the requirement to exceed national standards, no viability analysis and that each case should be assessed individually. One response was made on the basis that more needs to be incorporated into the plan to support sustainable living, to promote local food rather than imported, and to encourage local allotments and micro-energy projects in the area of all new housing.</p> <p>Officer Commentary: Comments noted but no changes proposed.</p>	
182	Offsite Energy Solutions	No comments logged.	
183	Strategy 41 - Allowable Solutions	<p>Objections were made on the basis that this will allow developers to avoid good practice on smaller developments, the Council intends to 'fine' development that does not implement the imprecise 'standards' that will be established under strategies 39 and 40 (in breach of CIL regulations) and any potential (pooled) contribution for infrastructure should be considered as part of the CIL.</p> <p>Officer Commentary: Comments noted but no changes proposed.</p>	

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184	Natural Stores of Organic Carbon	<p>One supporting comment was received welcoming endorsement of preserving carbon sinks through protection of land, but concern was expressed that this is out of step with predominantly construction based development, as proposed.</p> <p>Officer Commentary: Comments noted.</p>	
185	18. Our Outstanding Natural, Built and Historic Environment (Chapter)	<p>Issues addressed in comments received included:</p> <ul style="list-style-type: none"> • Endorsement for the thrust of Section 18 not least because they are responsible for natural and built assets afforded the highest protection. <p>Issues addressed in comments received included that the thrust of plan and policy in respect of the environment is supported.</p> <p>Officer Commentary: Comments noted.</p>	
186	The Quality of the East Devon Environment	<p>Issues addressed in comments received included that the Quality of the East Devon Environment - Needs to mention historic environment - landscape and archaeology not just built.</p> <p>Officer Commentary: Comments noted.</p>	
187	Green Networks and Green Infrastructure	<p>Supports expressed for Green Network and Infrastructure but must be designed to achieve biodiversity benefit - should include a specific GI objective to deliver biodiversity enhancement.</p> <p>Officer Commentary: Comments noted.</p>	
188	Promoting Green Infrastructure	<p>Issues addressed in comments received included:</p> <ul style="list-style-type: none"> • Promoting Green Infrastructure - Welcome reference to multi-functional nature of GI, but as mentioned, in practice the plan overlooks the historic environment (e.g. at Seaton). • Welcomes forthcoming Strategy but would like to see greater consistency of policy between EDDC and DCC. • Support for promoting Green Infrastructure and careful landscaping around and connecting small scale development sites at the edge of Built-up Area Boundaries. • should consider future of trees after dev completed and plan should dissuade developers from providing funds for off site open space provision. <p>Officer Commentary: Comments noted and agree that reference should be made to collaborative working.</p>	Text amended to refer to collaborative working.
189	Strategy 42 - Green Infrastructure Provision and Strategy	<p>Issues addressed in comments received included:</p> <ul style="list-style-type: none"> • Objection that plan wording should not seek to secure, via section 106 (or CIL), mitigation measures that are not strictly required to mitigate any identified impacts of development proposals. • Strategy 42 - GI needs to include NPPF Para 126 objectives as well as Habitat Regs. • Supports this Strategy. • relationship between GI strategy and SANGS should be clarified to enable a favourable Habitat Regs outcome. • View that the Clyst Valley may not be deliverable. 	Changes proposed in respect to detail of policy wording.

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		Officer Commentary: Comments noted and minor wording changes proposed.	
190	Open Space, Sport and Recreation	Objection that the plan does not make adequate and appropriate provision for open space, sport and recreation. Officer Commentary: Comments noted and minor wording changes proposed in respect to formal parks and gardens.	Minor change to text.
191	East Devon Open Space Standards	Comments are made that: <ul style="list-style-type: none"> • Objection that when considering open space standards there should be a policy distinction between urban and rural. • Classification of The Byes in the Open Space Study is incorrect. Parts owned by Sid Vale Association should be classified as Natural and Semi-Natural Greenspace - this directly affects the planning statement submitted with the Knowle application. Officer Commentary: comments noted.	Very minor amendments to text.
192	Strategy 43 - Open Space Standards	Comments are made included that: <ul style="list-style-type: none"> • Need more provision for elderly and dispensation for specific forms of housing. • Proposed standards are not reasonable nor practical to provide. • proposed threshold unduly onerous and does not allow for any viability testing • Standards should not apply to small schemes. • Standards above NPFA and unclear how they meet local need and fails to consider long term maintenance. • Objection that the individual circumstances of each site should be taken into account in determining the approach to and quantum of open space to be provided. • Suggests strategy needs to acknowledge that there are existing shortfalls of open space around the district. Officer Commentary: comments noted.	Minor amendments to text to note that standards are minimums.
193	Developer Contributions to Open Space	Comments made included that: <ul style="list-style-type: none"> • text should set out how partial on-site provision is provided and any residual financial contribution is established • Allowing developers to contribute towards off-site open space leads to a shortage of open space. The Local Plan should dissuade from this practice. • Allowing developers to contribute towards off-site open space leads to a shortage of open space. The Local Plan should dissuade from this practice. Officer Commentary: comments noted.	Minor amendments to text.
194	Coastal Areas of East Devon	Comment that in Coastal Areas of East Devon - The historic environment/archaeology are eroding as well, including Ancient Monuments and the human heritage components of the World Heritage Site. Officer Commentary: comments noted.	Minor amendments to text in respect of heritage assets and use of upto date information.

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195	The Coastal Zone and Landscape	No comments logged.	
196	Strategy 44 - Undeveloped Coast and Coastal Preservation Area	<p>Comments made included that:</p> <ul style="list-style-type: none"> • Strategy 44 is considered overly onerous and fails to present a 'positively planned' policy position it and supporting text should be amended to acknowledge that there is scope for appropriate development within the Coastal Preservation Area. • Objection to inclusion of Land Off Strawberry Hill within the CPA • Objection that proposed policy boundaries have not been examined and are unreasonable and arbitrary. The coastal zone should not be amended from the current defined area in the EDLP. • The inclusion of the representors land in the CPA is a mistake and issue should be looked into as it impacts on allocations • We are not aware of any justification for deviating from the existing CPA boundary and therefore request the boundary to be corrected in accordance with the CPA boundary shown in the technical working paper. • Concern expressed that any proposals that include building right up to the boundary of the Coastal Preservation Area will gives rise to inherent risks of pollution and additional flooding and would be contrary to this Strategy. <p>Officer Commentary: comments noted but no changes are proposed.</p>	
197	Shoreline Management Plans and Coastal Erosion and Defence	<p>Objection to lack of strategic policies to combat tidal flooding and coastal erosion now and in the face of sea level rise, neither is the Council prepared to say it will promote measures for doing so, it will merely support them.</p> <p>Officer Commentary: comments noted by no changes considered necessary</p>	Reference added to specify linked DM policies
198	Strategy 45 - Coastal Erosion	<ul style="list-style-type: none"> • Comment of support for strategy but suggests extension to all development at or on the coast. • Cliff Road Residents Action Group objection to lack of strategic policies to combat tidal flooding and coastal erosion now and in the face of sea level rise, neither is the Council prepared to say it will promote measures for doing so, it will merely support them. • Cliff Road Residents Action Group object to policy as sustainability has not been tested, does not strike a reasonable balance and is not consistent with the evidence. • Cliff Road Residents Action Group object to policy as the 'Preferred Approach' did not properly consider a reasonable alternative and so is not justified. <p>Officer Commentary: Change wording to more fully reflect the aims of the World Heritage Site Management Plan.</p>	Minor changes to text
199	The AONBs in East Devon	<p>Comments made included that:</p> <ul style="list-style-type: none"> • Concern expressed that policies do not afford sufficient protection to AONBs and that AONB designations may be lost. • supports plan in respect of AONB, landscape issues and tourism and food. 	

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		<ul style="list-style-type: none"> Conserving East Devon's status of area of outstanding natural beauty cannot be achieved with the amount of development proposed. <p>Officer Commentary: Comments noted but no changes proposed.</p>	
200	Development in the Landscape	<p>Comments made included that:</p> <ul style="list-style-type: none"> Landscape Character Assessment- how will AONB's be protected until the management plans are reviewed in 2014. Protected landscapes require assessments for major developments, glossary needs to define major developments. <p>Officer Commentary: Comments noted elsewhere definition of minor change is made.</p>	
201	Landscape Character Assessment	<p>Comments made included that:</p> <ul style="list-style-type: none"> Objection to lack of AONB Policy but also that policy, as written is far to draconian and is not in conformity with the NPPF. The Local Plan is very short on safeguard for small communities and the landscapes in which they live There should be a reference to the District Landscape Classification Assessment in the policy. Concern that a pragmatic approach is required for villages washed over by AONB. Limited development is vital in villages to meet local housing needs, support local services and increase self containment <p>Officer Commentary: Comments noted and a minor change is proposed in respect of reference to Devon County Landscape Character Area Assessment.</p>	minor change is proposed in respect of reference to Devon County Landscape Character Area Assessment.
202	Strategy 46 - Landscape Conservation and Enhancement and AONBs	No comments logged.	
203	Biodiversity and Geological Protection	No comments logged.	
204	National and International Wildlife Sites	No comments logged.	
205	The Habitat Regulations	<p>Objection that section of the plan on Habitat Regulations is barely coherent, It is considered a 'tax' on development. And also that Exe Estuary Ramsar site should also be listed in para. 18.43. 'Habitat Regs (Natural Habitats) Regulations 1994 should be replaced with 'Conservation of Habitats and Species Regulations 2010.</p> <p>Officer Commentary: Comments noted but no changes proposed.</p>	
206	The Exe Estuary SAC and	Representor advises that after paragraph 18.47 the paragraph number is out of sequence - paragraph numbers run 18.47 then 18.78, 18.79, 18.80, 18.81 and then 18.47 and 18.48. Also representation that Pebblebed Heaths and Exe	Changes are proposed in respect of Habitat Regulation issues.

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	Pebblebed Heaths SPA	<p>Estuary are habitats vulnerable to recreational disturbance. Increased development nearby will increase recreational disturbance. Adequate mitigation methods and/or alternative SANGS need to be provided. Pointed out that there is no Exe Estuary SAC. Support not allowing new dwellings within 400m of Pebblebed Heaths SPA. Need package of measure to mitigate any harm to Natura 2000 and Ramsar sites.</p> <p>Officer Commentary: Comments noted, minor changes are proposed.</p>	
207	Beer Quarry and Caves SAC	No Comments logged.	
208	Habitat Regulations Assessment – Air and Water Quality Issues	<p>Comments that Air and water quality related risk to Natura 2000 and Ramsar sites should not be dismissed on the basis that issues extend beyond land use planning - suggest similar approach to Poole Harbour.</p> <p>Officer Commentary: Comments noted but no changes proposed.</p>	
209	Strategy 47 - Nature Conservation and Geology	<p>Comments included that:</p> <ul style="list-style-type: none"> • The Local Plan is very short on safeguards for small communities and the landscape in which they live • Local, county and regionally designated sites should be included on the list of nature conservation sites • Nature Conservation and Geology policy should include local nature reserves, CWS's, and regionally important geological sites • Suggests that Strategy 47 and supporting text are dealing with issues that should be dealt with in Strategy 5. Suggests changes to current wording. • Policy needs to be strengthened. Suggested rewording of first point to achieve this. • wording passive, focus should be on securing mitigation measures, • Urge that Strategies 47- Nature Conservation and Geology and EN5 Protection of Wildlife Habitats and Features are strengthened to prevent any development that would adversely affect wildlife on or adjacent to Local or National Nature Reserves. • Consider that Section 18 and Strategies 47- Nature Conservation and Geology and EN5 Protection of Wildlife Habitats and features must be enforced. <p>Officer Commentary: Comments noted and a series of changes are proposed to the policy that reinforce the issues and policy approach in respect to European wildlife sites.</p>	Text amendments proposed in respect of ensuring European wildlife sites, in particular, are appropriately protected and affective mitigation measures are secured.
210	Design and the Built Heritage	<p>Respondent comments that EDDC has great cause for regret – they are the Planning Authority and the only people who had the power to allow these developments to proceed in the first place.</p> <p>Officer Commentary: Comments noted.</p>	
211	Strategy 48 - Local Distinctiveness in	<p>Comments received included that:</p> <ul style="list-style-type: none"> • Strong in principle support as emphasis on local distinctiveness is essential to conserving and enhancing the natural beauty of AONBs. However suggest that the final sentence should be reworded to emphasise working with partners. 	Minor change proposed to refer to working with partners.

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	the Built Environment	<ul style="list-style-type: none"> • "Work with local communities" does not mean EDDC deciding the task, the process and the outcome • Could work with local communities, the AONBs and Mineral Planning Authority to provide supplies of local stone for conservation purposes. Utilising the results of the Devon Strategic Stone Study. • Strong in principle support as emphasis on local distinctiveness is essential to conserving and enhancing the natural beauty of AONBs. However suggest that the final sentence should be reworded to emphasise working with partners. • Strengthen policy so that EDDC are active in promoting good design. All communities should have care taken over design, whether they have a design statement or not <p>Officer Commentary: Comments noted and minor change proposed.</p>	
212	Buildings and Building Conservation	<p>View expressed that Buildings and Building Conservation - needs greater emphasis on archaeology and historic landscape character as well as built heritage. Section 18.53 refers to NPPF Para 126, but Strategy 49 refers to the Built Heritage and Building Conservation</p> <p>Officer Commentary: Comments noted and minor change proposed.</p>	Reference made to historic environment.
213	Strategy 49 - The Built Heritage and Building Conservation	<p>Views expressed that :</p> <ul style="list-style-type: none"> • Needs greater emphasis on archaeology and historic landscape character as well as built heritage. Section 18.53 refers to NPPF Para 126, but Strategy 49 refers to the Built Heritage and Building Conservation. • Support subject to positive emphasis to the protection of heritage assets via enabling development <p>Officer Commentary: Comments noted and minor change proposed.</p>	Reference made to historic environment.
214	19. Delivery and Infrastructure Provision (Chapter)	<p>Views express that :</p> <ul style="list-style-type: none"> • Concerns over delivery of infrastructure to meet growth • Concern is raised about the viability of Delivery and Infrastructure Provision in the plan and the CIL work not proceeding alongside the plan. <p>Officer Commentary: Comments noted.</p>	
215	Provision of Social, Physical and Community Infrastructure	No comments logged.	
216	Understanding Other Organisations' Proposals and Plans	No comments logged.	
217	Developer Contributions and the Community	Objection made to the failure of the plan to recognise that increased housing/population growth will impact on health services and the plan should include a description of how investment will be made.	No changes proposed.

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	Infrastructure Levy	Officer Commentary: Comments noted.	
218	Partnership Working	No comments logged.	
219	Infrastructure Provision	Dorset County Council supports the content of paragraph 19.9 that indicates that East Devon recognises the implications that new development can have on the capacity levels of roads and junctions. Officer Commentary: Comments noted.	
220	Strategy 50 - Infrastructure Delivery	Views expressed include: <ul style="list-style-type: none"> • Plan fails to address deficiencies in infrastructure or provide for new infrastructure. • More detail of strategy is needed. • There must be serious question marks over the soundness of the plan given that the Council's approach is to allocate land first then cost the infrastructure reqd. • Infrastructure costing should be part of the front end work. • provision of clear mechanism welcomed but CIL details will be critical and should be consulted on. • Concern that no reference is made within Strategy 50 of the need to provide maintenance and improvements of flood defence assets within strategic places. • Habitat mitigation and green space funding should be given the highest priority in the IDP. If CIL is used to fund it then it should be linked to Strategy 50. • Infrastructure Delivery - whilst the thrust of policy is supported concern is raised that an over-provision of employment land in the West End will frustrate potential to help ensure delivery of West End infrastructure. • Objection that it is unacceptable that an Infrastructure Delivery Plan has not been published alongside the Local Plan nor for that matter has the Draft Community Infrastructure Levy been published. • requests addition to policy to include 'the health consortia' in consultations on planning applications with health/welfare implications. Officer Commentary: Comments noted and a number of changes are proposed to Strategy 50.	The strategy is proposed for amendment to clarify current work on the IDP and CIL work.
221	20. Monitoring (Chapter)	Representation that the plan requires a clear explanation of how the 5 year land supply will be monitored. Officer Commentary: Comments noted.	
222	How we Measure the Impacts of Policy	Representation that insufficient information on monitoring, particularly biodiversity objectives and mitigation of impacts on Natura 2000 and Ramsar sites. Officer Commentary: Comments noted.	Change proposed highlighting further work to be done.
223	Five Year Land Supply and Sub-Housing Areas	Comments received included: <ul style="list-style-type: none"> • Objection that the Council's current approach on Five Year Land Supply and Sub-Housing Areas is seen as incorrect. Five year reqt is a District wide need. 	

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		<ul style="list-style-type: none"> • Consider it inappropriate to use a disaggregated approach in establishing five year housing land supply. It has led to a distorted view of delivery in recent years. • Objection to there not being explicit or sufficiently explicit policy in the plan that disaggregates the District into two constituents parts, 1.West End and 2.Rest of East Devon. This split is seen as essential to delivery the spatial vision of the plan. • Respondent questions the suggestion that there is less than 5 years land supply in the "West End" especially given planning consents granted recently. • It is considered that a disaggregated approach to calculating land supply is seen as critical and policy reference is seen as required. • Objection that plan over-provides for housing and in so doing is unable to show a five year land supply leaving the District vulnerable to unwanted developments <p>Officer Commentary: Comments noted but no changes are proposed.</p>	
224	PART TWO – DEVELOPMENT MANAGEMENT POLICIES (Section)	<p>Objection that the Local Plan should be produced alongside the CIL work and the villages DPD and that the cost demands imposed by policies of the plan will impact on commercial viability and result in development not happening.</p> <p>Officer Commentary: Comments noted but no changes are proposed.</p>	
225	21. Design Standards (Chapter)	<p>Should be more focus on environmentally sustainable design.</p> <p>Officer Commentary: Comments noted but no changes are proposed.</p>	
226	Achieving High Quality and Locally Distinctive Design	<p>No Comments logged.</p>	No changes required
227	D1 - Design and Local Distinctiveness	<p>Matters raised in comments included:</p> <ul style="list-style-type: none"> • Objects to the way the Sustainability Appraisal refers to Design Statements as a hindrance. • Design Statements should be given greater recognition in D1. D1 needs to promote good design in existing buildings that are being changed. • The adoption of an approved Neighbourhood Plan as planning guidance is not optional • Policy would be enhanced by reference to waste hierarchy rather than waste minimisation in point (4b). • New developments should be expected to benefit wildlife. • Consider that the word "Reinforce" in line 1 is inappropriate. It may not be appropriate to "reinforce" the key characteristics of an area if the character itself is not particularly attractive or worthy. • Objection that policy should be removed and as a minimum criterion 5 deleted. • This policy is supported; we welcome the recognition of good design as a way to achieve many outcomes, regardless of scale, in both urban and rural settings. 	Minor changes to wording

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		<ul style="list-style-type: none"> policy overly prescriptive and inflexible and contrary to para 60 of the NPPF. <p>Officer Commentary: Comments noted but no changes are proposed.</p>	
228	Landscaping	No comments logged.	
229	D2 - Landscape Requirements	<p>Concern that this policy and criterion 2 in particular fails to address the totality of the landscape and the measures required to maintain and/or improve. Policy may well lead to confusion and unsatisfactory design.</p> <p>Officer Commentary: Comments noted but no changes are proposed.</p>	
230	Trees on Development Sites	No comments logged.	
231	D3 - Trees and Development Sites	<p>Views expressed included that:</p> <ul style="list-style-type: none"> Policy D3 should be extended to protect trees beyond completion of a development once new inhabitants move in. Unlawful removal of trees should be better enforced. Suggests that Policy D3 needs to define 'significant value' - this should be to the parish in general not just in terms of age or species. Says D3 needs to be proactive in protecting trees and enforcing against their unlawful removal. Suggests that Policy D3 needs to define 'significant value' - this should be to the parish in Objection that the policy as drafted is far too onerous and will create conflicts with the strategic policy and site allocations referred to elsewhere. <p>Officer Commentary: Changes proposed to draw the plan more fully into line with good practice in respect to tree considerations.</p>	Amendments made to draw the plan more fully into line with good practice
232	Advertisements Signs	No comments logged.	
233	D4 - Applications for Display of Advertisements	No comments logged.	
234	D5 - Advertisements within Areas of Special Control of Advertisements and Advance Advertisement Signs	No comments logged.	
235	Fuel for Heating Buildings	No comments logged.	

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236	D6 – Locations without Access to Natural Gas	Three representations were received. The first supported the Policy but doubted it would be enforced, the other two felt the policy was irrelevant (not a planning consideration) and onerous (should only apply where practicable) Officer Commentary: Comments noted but no changes are proposed.	
237	Agricultural Buildings	No Comments logged.	
238	D7 – Agricultural Buildings and Development	One representation was received, supporting policy but requesting that it also include provision for other land based businesses and isolated buildings not closely related to existing buildings. Officer Commentary: Comments noted but no changes are proposed.	
239	Re-use of Rural Buildings Outside of Settlements	No comments logged.	
240	D8 – Re-use of Rural Buildings Outside of Settlements	Several representations were received. Generally these were supportive but requested that affordable housing policies not need to be adhered to due to viability issues, policy be included to deal with replacement buildings for those not capable of re-use, and clarification be given to confirm it also relates to isolated buildings. Officer Comment: The text has been amended to reflect the need to take the significance of heritage assets (designated or not) into account. Heritage statements/surveys may be needed as well as bat/owl surveys.	Need to take significant heritage assets into account. May need heritage statements
241	22. The Natural and Built Environment (Chapter)	Objection that wordings needs to be natural and historic environment. Does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. Officer Comment: Objection noted and wording changed.	Amended chapter title.
242	Important Local Open Spaces	Support expressed for references to Important Local Open Spaces. Officer Comment: Support noted	Minor change to plan is proposed.
243	EN1 - Land of Local Amenity Importance	Comments made included: <ul style="list-style-type: none"> • Support for Land of Local Amenity Importance designation at the Valley Parks in Exmouth • Objection that any proposed development on land with local amenity importance near a brook should be opposed, especially where runoff water could have impact on dwellings and residents downstream. • development on land with local amenity importance near a brook should be opposed, especially where runoff water could have an impact downstream. Officer Comment: comments are noted though changes are not proposed.	
244	The Valley Parks in Exmouth	Comments made included: <ul style="list-style-type: none"> • The Valley Parks in Exmouth - Concern that land should not be developed on due to flooding issues and also because of its environmental and green infrastructure importance 	

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		<ul style="list-style-type: none"> • Objection that the Valley Parks are described on page 159 "for informal activities"- there is still no mention of cycleways in the Valley Parks being part of a Town Network. • Objection that policy is not proactive enough in seeking to promote the Valley Parks in Exmouth and EDDC should endeavour to purchase sensitive amenity land now or in the future such as Withycombe Brook. • Representors advise that they fully support East Devon District Council's proposed Local Plan 2006 to 2026 in areas EN2 the Valley Parks Exmouth, which should continue to protect these areas from housing development. • Representor advises that he would urge the Council planners and everyone involved to resist pressure of these areas. Finances may be stretched at the current time but if this land is developed for short term gain it is lost forever. <p>Officer Comment: comments are noted though changes are not proposed.</p>	
245	EN2 - The Valley Parks in Exmouth	<p>Comments made included:</p> <ul style="list-style-type: none"> • Objection relating to identifying the Exmouth Valley Parks - (Bapton and Withycombe) EN2 (page 160) states that the Valley Parks are identified on the Proposals Map - but the maps I was given do not show the Valley Parks. This is another serious omission. • Objection to potential for development of land at/near to the Valley Park in respect of concerns arising from flooding • Representor advises that they would just like to confirm that I am wholeheartedly in agreement with the local plan ref point 6.245 and would oppose building in the Valley Parks • development on land with local amenity importance near a brook should be opposed, especially where runoff could have an impact downstream. <p>Officer Comment: comments are noted and change is proposed to clarify land that policy applies to. Also change is made to refer to habitat mitigation.</p>	Changes proposed to clarify land that policy applies to. Also change to refer to habitat mitigation.
246	The Byes in Sidmouth	<p>Remove reference to LSI 2 which doesn't have any context.</p> <p>Officer Comment: comments are noted and change is proposed to remove the reference.</p>	Reference to LSI 2 proposed to be removed.
247	EN3 - Land at the Byes in Sidmouth	No comments logged.	
248	Local Wildlife Sites and Features	No comments logged.	
249	EN4 - Protection of Local Nature Reserves, County Wildlife Sites and County Geological Sites	<p>Comments made included:</p> <ul style="list-style-type: none"> • Urge retention of policies that prevent any development taking place that will have a detrimental effect on views of surrounding countryside and on habitat and feeding grounds at the Axe Valley Wetlands and areas linked. • EDDC is in effect opening the doors to development. • Local Nature Reserves, County Wildlife Sites and County Geological Sites require far higher protection, should be included in Strategy 47 	

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		<ul style="list-style-type: none"> This policy introduces the risk of conflict between national policy and local plan policy and is therefore superfluous. Local Nature Reserves, County Wildlife Sites and County Geological Sites should be protected or at least treated as amenity land, to be developed only if there is a community need. <p>Officer Comment: comments are noted though changes are not proposed.</p>	
250	EN5 - Wildlife Habitats and Features	<p>Comments made included:</p> <ul style="list-style-type: none"> EDDC is in effect opening the doors to development. Fully support EN5 but plan fails to reflect NPPF advice on delivering wildlife enhancements - no reference to prioritising biodiversity enhancements and priority habitat creation opportunities are not mapped. objects to policy as first two words (where possible) constitute a large loop hole. EN5 - Wildlife Habitats and Features should delete 'wherever possible' and 'where potential arises'. This policy introduces the risk of conflict between national policy and local plan policy and is therefore superfluous. Wildlife Habitats and Features- policy is too ambiguous and has loopholes <p>Officer Comment: comments are noted though changes are not proposed.</p>	
251	Archaeological Features and Sites	<p>Comment that policy does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment.</p> <p>Officer Comment: comments are noted though changes are not proposed.</p>	No changes required
252	EN6 - Nationally and Locally Important Archaeological Sites	<p>Comments made included:</p> <ul style="list-style-type: none"> EDDC is in effect opening the doors to development Policy does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. This policy introduces the risk of conflict between National Policy and Local Plan Policy and is therefore superfluous. <p>Officer Comment: comments are noted though changes are not proposed.</p>	No changes required
253	Potentially Important Archaeological Sites ⁷	<p>Comments made included:</p> <ul style="list-style-type: none"> Potentially Important Archaeological Sites - Does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. <p>Officer Comment: comments are noted though changes are not proposed.</p>	
254	EN7 - Proposals Affecting Sites which may potentially be of Archaeological Importance	<p>Comments made included:</p> <ul style="list-style-type: none"> EN7 - Proposals Affecting Sites which may potentially be of Archaeological Importance - - Does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. This policy introduces the risk of conflict between National Policy and Local Plan Policy and is therefore superfluous. 	Wording updated to improve NPPF compliance

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		Officer Comment: comments are noted and changes are proposed.	
255	Building Conservation and Listed Buildings	Comments made included: <ul style="list-style-type: none"> • Building Conservation and Listed Buildings - Does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. Officer Comment: comments are noted though changes are not proposed.	No changes required
256	EN8 - Extension, Alteration or Change of Use of Buildings of Special Architectural and Historic Interest	Comments made included: <ul style="list-style-type: none"> • EN8 - Does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. • Support subject to positive emphasis to the protection of heritage assets via enabling development • This policy introduces the risk of conflict between National Policy and Local Plan Policy and is therefore superfluous. • Listed buildings should be protected but allowed to develop more sensitively to suit modern day needs. Officer Comment: comments are noted and changes are proposed.	Wording updated to improve NPPF compliance
257	Demolition of Listed Buildings	Comments made included: <ul style="list-style-type: none"> • Demolition of Listed Buildings - - Does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. Officer Comment: comments are noted and changes are proposed.	Wording updated to improve NPPF compliance
258	EN9 - Demolition of a Listed Building	No comments logged.	Wording updated to improve NPPF compliance
259	Conservation Areas	Comments made included: <ul style="list-style-type: none"> • Conservation Areas - Does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. Officer Comment: comments are noted but no changes are proposed.	No changes required
260	EN10 - Preservation and Enhancement of Conservation Areas	Comments made included: <ul style="list-style-type: none"> • EN10 - Preservation and Enhancement of Conservation Areas - Does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. • Lymptone Parish Council is awaiting the outcome of the 2012 review of the Parish Conservation Area. Officer Comment: comments are noted and changes are proposed.	Wording updated to improve NPPF compliance

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261	EN11 - Demolition of Unlisted Buildings in Conservation Areas	<p>Comments made included:</p> <ul style="list-style-type: none"> EN11 - Demolition of Unlisted Buildings in Conservation Areas - Does not comply with NPPF Para.126 requiring Local Plans to have a positive strategy for the conservation and enjoyment of the historic environment. <p>Officer Comment: comments are noted and changes are proposed.</p>	Wording updated to improve NPPF compliance
262	Parks and Gardens of Historic Importance	<p>Comments made included:</p> <ul style="list-style-type: none"> R6.262, R6.263 - EN6 to EN12 are all welcome as policies, but need greater linkage to the front-end of the document, GI objectives and NPPF Para 126. Additional Policies relating to specific Parks and Gardens of Historic Importance are requested <p>Officer Comment: comments are noted but changes are not proposed.</p>	
263	EN12 - Development Affecting Parks and Gardens of Special Historic Interest	<p>Comments made included:</p> <ul style="list-style-type: none"> Suggests Policy EN12 should also include privately owned gardens with notable historical or arboricultural characteristics - as it is these will not be afforded the same protection. <p>Comments made included:</p> <ul style="list-style-type: none"> Additional Policies relating to specific Parks and Gardens of Historic Importance are requested Policies for the protection of parks, gardens and landscapes should be recognised and supported by inclusion of policies for their protection in local plans. <p>Officer Comment: comment/s are noted and changes are proposed.</p>	Wording updated to improve NPPF compliance
264	Important Agricultural Land	<p>Comments made included:</p> <ul style="list-style-type: none"> The development of solar farms on land with an agricultural grade 1, 2, or 3a should be resisted. Policy appears to be much too onerously drafted and risks introducing conflict between sustainable development and protection of agricultural land. <p>Officer Comment: comment/s are noted but no changes are proposed.</p>	
265	EN13 - Development on High Quality Agricultural Land	<p>Comments made included:</p> <ul style="list-style-type: none"> Paragraphs refer to proposals involving the management of animal waste. It should be clarified that Devon County Council would be responsible for determining such applications as Waste Planning Authority. <p>Officer Comment: comment/s are noted but no changes are proposed.</p>	
266	Environmental Pollution	No comments are logged.	Change is proposed to refer to role off Devon County Council.
267	EN14 - Control of Pollution	<ul style="list-style-type: none"> In the preamble text there is no reference to noise pollution or disturbance. The policy itself refers to an “unacceptable” level of noise and/or vibration – unacceptable to whom and what are the thresholds? 	

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		Officer Comment: comment/s are noted but no changes are proposed.	
268	Bad Neighbour Uses	<ul style="list-style-type: none"> Both of these paragraphs refer to proposals involving the management of animal waste. It should be clarified that Devon County Council would be responsible for determining such applications as Waste Planning Authority. Officer Comment: comment/s are noted.	Change is proposed to refer to role off Devon County Council.
269	EN15 - Environmental Impacts, Nuisance and Detriment to Health	Comments made included: <ul style="list-style-type: none"> There should be a specific policy to say motorsport development in the AONB will be refused. Motorsport and the AONB are not compatible Uses at Greendale and Hill Barton business parks can be considered bad neighbour uses and so operations should be discouraged. Industry in the countryside should be limited/reduced. Officer Comment: comment/s are noted but no changes are proposed.	
270	Contaminated Land and its Remediation	No comments logged.	
271	EN16 – Contaminated Land	Comments made included: <ul style="list-style-type: none"> Active and former waste sites can cause other types of land contamination in addition to leachate and landfill gas and therefore this policy should be left open to take account of this. Officer Comment: comment/s are noted.	Change proposed to refer to leachates.
272	Potentially Hazardous Developments	No comments logged.	
273	EN17 - Notifiable Installations	No comments logged.	
274	Water Quality, Sewerage, Flooding and Coastal Erosion	Comments made included: <ul style="list-style-type: none"> Developers should be required to improve the land and surface water drainage of the whole area including existing properties through their developments Officer Comment: No changes considered necessary	
275	EN18 - Maintenance of Water Quality and Quantity	Comments made included: <ul style="list-style-type: none"> Unnecessary duplication of existing regulation and guidance already set out at national level. Officer Comment: The NPPF says local planning authorities should focus on whether a development is an acceptable use of land and the impact of the use, rather than the control of processes or emissions themselves (paragraph 122). Policy EN18 complies with this approach and no changes are considered to be necessary.	

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276	Sewers and Water Treatment	No comments logged.	
277	EN19 - Adequacy of Foul Sewers and Adequacy of Sewage Treatment System	<p>Comments received included:</p> <ul style="list-style-type: none"> • Support for provision of, and enforcement of, adequate sewer provision • Respondent raises concerns over "Adequacy of Foul Sewers and Adequacy of Sewage Treatment System" and advises in Feniton at times - the foul drainage system is completely overloaded and where we have sewage running down the middle of the road. • Respondent states EDDC must make sure that conditions regarding any sewerage improvements and sewage treatment provision required by SWW are included on permissions and are actually adhered to prior to commencement by developers. <p>Officer Comment: No changes are considered necessary.</p>	
278	EN20 - Private Sewage Treatment Works	<p>Comments made included:</p> <ul style="list-style-type: none"> • This policy is not sufficiently flexible. The policy should be reworded as follows: "...an adequate subsoil drainage system or alternative treatment system". <p>Officer Comment: Suggested wording would improve policy – change as representor suggests.</p>	Proposed to include reference to 'alternative treatment system'.
279	Flooding and Flood Prevention	No comments logged.	
280	EN21 - River and Coastal Flooding	<p>Comments made included:</p> <ul style="list-style-type: none"> • EN21 - River and Coastal Flooding and EN 22 Surface Run-off - We support these strategies to ensure that any development that conflicts with them would be refused. • We endorse these policies whole heartedly. • Again this is a duplicate of the Framework. As such the policy is unnecessary and should be removed. • Questions whether enough research has been carried out with regard to flood prevention • River and Coastal Flooding likely to worsen in future, greater consideration should be given to the issue in proposing new development on or near flood plains. <p>Officer Comment: The policy complies with the NPPF and adds East Devon specific detail, which is appropriate for a local plan. No changes necessary.</p>	
281	EN22 Surface Run-Off Implications of New Development	<p>Issues raised in comments included:</p> <ul style="list-style-type: none"> • there is a need to gain a better understanding of mechanics of land and surface drainage related to development and amend plan to require surface water issues to be addressed during application process. • Support expressed for inclusion of policies EN22 and EN23 which address surface water run-off from new development. • requirement should be commensurate with size and nature of development 	

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		<ul style="list-style-type: none"> This is a duplicate and risks conflict with existing requirements for Flood Risk Assessments set out in the supporting technical guidance to PPS25. A new improved flood risk assessment is required to deal with increased runoff flood risk. New development causes worse flooding. Cranbrook has increased flooding on the River Clyst. Developers should provide stronger evidence that their development will not increase Surface Run-Off <p>Officer Comment: comments noted but no changes necessary</p>	
282	EN23 - Coastal erosion and surface water run-off	<p>Comments made included:</p> <ul style="list-style-type: none"> Considered that a new flood risk assessment is required given increased prolonged periods of rainfall <p>Officer Comment: No changes necessary.</p>	
283	Coastal Defence Schemes	No comments logged.	
284	EN24 - Coastal Defence Schemes	<p>Comments made included:</p> <ul style="list-style-type: none"> Bourne Leisure objects to the approach of "No Active Intervention" in respect of their site and opposes allowing natural retreat of this part of the coast to take place, where it may impact detrimentally upon the continued operation of the holiday park. A response requests a minor change be made to policy EN24 to read ; " ... in line with the most up to date Shoreline Management Plan or prevailing coastal strategy" . Incorporate change suggested by Environment Agency to allow flexibility to take most appropriate policy context into account. Remove 'any' from policy to allow flexibility. The Cliff Road Action Group object to policy as it is not clear that the Council supports the provision of new coastal defences to protect existing development. Private investment in coastal defences does not have to be in line with the Shoreline Management Plan. Use of word 'any' impact does not allow flexibility. 'unacceptable adverse impact' is not defined <p>Officer Comment: Plan is recommend for change to update references to Shoreline Management Plans and remove reference to 'any' impact.</p>	Plan is recommend for change to update references to Shoreline Management Plans and remove reference to 'any' impact.
285	Coastal Change Management Areas	No comments are logged.	
286	EN25 – Development Affected by Coastal Change	<p>Comments made included:</p> <ul style="list-style-type: none"> Bourne Leisure accepts the inclusion of a 'roll-back' policy but the Company believes coastal protection measures should take priority where erosion could impact on businesses and livelihoods and landowners should be allowed to contribute to measures. <p>Officer Comment: No changes necessary.</p>	

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287	23. New Residential Development (Chapter)	<p>Comments made included:</p> <ul style="list-style-type: none"> • proposes additional policy to require justification for building agricultural buildings in the open countryside and additional policy for barn conversions to require them to be structurally sound. • Objection to the failure of the plan to propose a Built-up Area Boundary for Dulford and for land north of Four Lanes Cross to be included in the area. Dulford is seen as an appropriate location for new housing with excellent transport links. • Cutler Hammer site is not a smaller scale housing site, it is a strategic site and text should reflect this. <p>Officer Comment: No changes necessary.</p>	
288	Sites for Housing Development	No comments logged:	
289	H1 - Residential Land Allocation	<p>A considerable number of site specific and more general points were logged against this section of the plan, these included:</p> <ul style="list-style-type: none"> • Objection to the failure of the local plan to allocate identified site at Woodbury Salterton for residential development. • Object to development on sites outside the BUAB at Seaton. • Objection to the allocation of the Port Royal site in Sidmouth as policy not taking into account work on the development brief and failing to recognise the range of end uses the site should accommodate. • The Local Plan should provide a coherent framework for allocating housing and employment land; and yet the District Council is offering an ad-hoc, 'pass-the-parcel' approach as serious policy decision-making. • Objection to proposals for development of the Council offices site for housing and instead an alternative part conversion to housing and part office redevelopment is advocated. • Objection to the failure of the Local Plan (Policy H1) to allocate land between B3181 and the M5 motorway for residential development. • land to the south west of Woolbrook Road should be allocated for in excess of 100 homes including the delivery of a park and change facility for the town within Policy H1. • Objection that clients' land (at Summer Ln) can and should be identified for housing development not least because it would facilitate the Dinan Way extension which would be required should the Council choose to allocate any land for housing in the area. • Objection to allocation of Knowle and Port Royal for housing use, they are vigorously opposed by the majority of the local population and are not suitable for inclusion in the Local Plan. • Allocation at Honiton should be increased. Site for 12-18 houses at Hale Lane should be allocated. • Objection to the failure of the plan to not allocate land (being promoted by Devonshire Homes) to the north of Cloakham Lawns in Axminster for residential development. <p>Officer Comment: No changes are proposed to initial part of the policy but see comments below.</p>	

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290	H1 - Residential Land Allocation - Budleigh PP allocation site	<ul style="list-style-type: none"> Objects to allocation of non-strategic residential at Budleigh Salterton due to the impact on the AONB, Pebblebed Heaths and protected species being present. The allocation is unjustified. Suggests changing total for Budleigh to be "up to" 110 homes. <p>Officer Comment: No changes are proposed.</p>	
291	H1 - Residential Land Allocation - Budleigh allocation site north-east of Deepways	<ul style="list-style-type: none"> Concern expressed about the amount of development proposed on the Deepways C096 site. Supports the inclusion of land (site C046) within the amended BUAB for Budleigh Salterton. Objects to allocation of non-strategic residential at Budleigh Salterton due to the impact on the AONB, Pebblebed Heaths and protected species being present. The allocation is unjustified. Suggests changing total for Budleigh to be "up to" 110 homes. <p>Officer Comment: No changes are proposed.</p>	
292	H1 - Residential Land Allocation - Cuttler Hammer Site	No comments logged.	Proposed that text notes the resolution to grant permission on this site.
293	H1 - Residential Land Allocation - Land North of Rowan Drive site	<p>Objections to allocation of Land North of Rowan Drive for housing were received, as it is outside of the existing BUAB and not supported by local people or Town Council. Conversely an objection was made because, whilst the principle of development at Sites E007 and E008 in Seaton is supported, the plan does not provide for sufficient housing development at this land.</p> <p>Officer Comment: No changes are proposed.</p>	
294	H1 - Residential Land Allocation - Land West of Barnards Hill Lane site	<p>Objections to allocation of Barnards Hill Lane for housing were received, as it is outside the existing BUAB and not supported by local people or the Town Council. A supporting representation was also received.</p> <p>Officer Comment: No changes are proposed.</p>	
295	H1 -Residential Land Allocations - KNOWLE SITE	<p>A large number of respondents to the plan objected to the allocation of land at the Knowle, Council offices site for residential development. Whilst some respondents opposed any development / redevelopment of the site in principle, highlighting concerns around loss of jobs and loss of historic buildings, many responses were concerned with specifically with loss of parkland and car parking spaces. Concerns raised in objections included amenity and wildlife impacts and reduction in recreation space.</p> <p>Officer Comment: A change is proposed to the extent of the allocated are.</p>	The land allocation at the Knowle for housing is shown to cover the footprint and immediately abutting land of the Council office building, the poly—tunnel/garden maintenance area and the middle and top car parks.

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296	H1 -Residential Land Allocations - Manstone Depot site	<p>A large number of objections were raised to the allocation of the Manstone Depot site for residential development. Most respondents were concerned about the loss of employment provision of the site.</p> <p>Officer Comment: Whilst the site does currently support some employment use the number of jobs is low and they are accessed through narrow roads.</p>	
297	H1 -Residential Land Allocations - Port Royal site	<p>There was some objection to redevelopment of the Port Royal site, including/to incorporate housing use. There was, however, also support for redevelopment of the site with a number of respondents advocating residential uses as part of mixed use residential development.</p> <p>Officer Comment: No changes are proposed and a mixed use development at this site is seen as appropriate.</p>	
298	Mix of Houses on Development Schemes	<p>Comments made included:</p> <ul style="list-style-type: none"> • Considered that correct mix of houses on development schemes is essential and advocates new build bungalows (small and easy to maintain) are included in the general housing mix • Objection raised to lack of reference to affordable rent properties in the plan section on mix of houses on development schemes as houses for sale are not affordable for many <p>Officer Comment: No changes are proposed.</p>	
299	H2 - Range and Mix of New Housing Development	<p>Comments made included:</p> <ul style="list-style-type: none"> • Concern expressed over poor wording and/or misprint in plan text. • Considered that the requirement to provide smaller dwellings is onerous. What is the definition of a "smaller dwelling". • The policy as drafted would provide unnecessary and unreasonable constraint to the delivery of a range and mix of housing across the district meeting the needs of all sections of the community. • Supports policy H2 in order to create housing "fit for purpose" for all ages of the community. Also welcomes need for Landscape Character Assessment and opportunity for Self Build schemes. • target for self build not justified. • support opportunities for self build but percentage target is not sound policy making - no evidence for either viability or local need. • Agree with the principle of Policy H2 which relates to the provision of a range and mix of new housing development, we object to the current drafting of the policy. We contend that as currently worded, Policy H2 may impact on viability. 	

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		Officer Comment: No changes are proposed.	
300	Conversion of Houses to Flats	No comments are logged.	
301	H3 - Conversion of Existing Dwellings and Other Buildings to Flats	Comments made included: <ul style="list-style-type: none"> H3 - Conversion of Existing Dwellings and Other Buildings to Flats should refer to countryside protection policies Officer Comment: No changes are proposed.	
302	Agricultural Workers Homes	Officer Comment: No comments logged however the text has been amended to comply with the NPPF and define 'rural worker'	Text has been amended to comply with the NPPF and define 'rural worker'
303	H4 - Dwellings for Persons Employed in Agriculture or Forestry	Objections were received on the basis that the Policy is too restrictive and definition should be widened from Agriculture or Forestry to include other rural workers. Officer Comment: Definition widened from Agriculture or Forestry to include other rural workers	Definition widened from Agriculture or Forestry to include other rural workers
304	H5 - Occupancy Conditions on Agricultural/Forestry Dwellings	Officer Comment: No comments logged. But policy amended for clarification and to reflect NPPF	Policy amended for clarification and to reflect NPPF
305	Replacement Dwellings in the Countryside	No comments logged.	
306	H6 - Replacement of Existing Dwellings in the Countryside	One objection was received on the grounds that the preamble in paragraph 23.12 refers to exceptional circumstances where it would be desirable to allow the replacement dwelling. Policy should include reference to this by way of an exception test. Officer Comment: No changes are proposed.	
307	Gypsies and Travellers	One objection was received relating to definition of travellers needed and reference to conflict should be removed. This has been incorporated into the text. Officer Comment: change proposed.	Reference to potential conflict deleted
308	H7 - Sites for Gypsies and Travellers	Three comments were made. The first supported the approach. The second stated that point 5 is unrealistic and should be reworded (amendment has now been made) and the last one objects to lack of strategic policy for Sites for Gypsies and suggests that permission for sites should only be granted in the west end with no allowance made in countryside areas.	Minor clarification of policy wording in respect of gypsy and traveller provision.

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		Officer Comment: change proposed.	
309	24. Employment, Economic Development, Retail and Tourism (Chapter)	<p>Comments made included:</p> <ul style="list-style-type: none"> • Support for provision of employment land in general. <p>Officer Comment: comment noted.</p>	
310	Provision of Employment Land	<p>Comments made included:</p> <ul style="list-style-type: none"> • Concern expressed over poor wording and/or misprint in plan text • Objection that the Use Classes of development that will be permitted on specific sites will be subject to consultation and discussion with the relevant site owners. <p>Officer Comment: comment noted but no change proposed.</p>	
311	E1 - Provision of Employment Land	<p>Comments made included:</p> <ul style="list-style-type: none"> • in principle concerns regarding the inclusion of 5ha of land for employment development north of Sidford as a non-strategic site, in terms of landscape character and the potential for coalescence with Sidbury. • Objection to the plan at Policy E1 to effectively plan for upgrading of or new access into the Alexandria Industrial Estate in Sidmouth • Objection to plan not allocating land south of Axminster adjacent to the A35 between the railway and the Musbury Road (o.s. Map ref. 290975) for employment purposes. • object - Table E1 does not show full picture <p>Officer Comment: comment noted but no change proposed.</p>	
312	E1 - Provision of Employment Land - Millwey Industrial Estate employment site	No comments logged.	
313	E1 - Provision of Employment Land - Land South of Redgate employment site	No comments logged.	
314	E1 - Provision of Employment Land - Heathpark employment site	<p>Comments made included:</p> <ul style="list-style-type: none"> • Object that the undeveloped land of approximately 0.5 acre located between Site Reference 011A and Devonshire Road should be included as part of Site Reference 011A. It is within the same ownership. 	

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		Officer Comment/s: comment noted but no change proposed.	
315	E1 - Provision of Employment Land - Finimore Industrial Estate employment site	No comments logged.	
316	E1 - Provision of Employment Land - Sidford Employment site	<p>The proposed Sidford employment allocation received more objections than any other proposed land allocation in the plan (though there was also support expressed). Objectors to the allocation raised issues that included:</p> <ul style="list-style-type: none"> • What was seen as a flawed process in leading to allocation and site choice. • Lack of need for employment land; • Lack of demand for an employment use. • Adverse landscape impacts; • Impact son the AONB and development in the AONB. • potential for coalescence with Sidbury. • Development on a floodplain and general flooding concerns. • Traffic impacts. • Concerns over water pollution. <p>Officer Comment: comment noted – see proposed changes to Strategy 26.</p>	No changes (other than to clarify site reference to site reference number are proposed at this policy. However see references to proposed changes to Strategy 26.
317	E1 - Provision of Employment Land - Alexandria Rd employment site	No comments logged.	
318	Employment Uses in Built-up Area Boundaries	No comments logged.	
319	E2 - Employment Generating Development in Built-Up Areas	No comments logged.	
320	Loss of Employment Land and Sites	<ul style="list-style-type: none"> • object - EDDC are making a planning app that is contrary to policy and must either apply policy themselves or delete as latter application would always fail on appeal. <p>Officer Comment: comment noted but no change proposed.</p>	

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321	E3 - Safeguarding Employment Land and Premises	<p>Comments made included:</p> <ul style="list-style-type: none"> • This policy conflicts with the Government Policy set out in paragraph 51 of the Framework, which states that LPAs: "...should normally approve planning applications for change to residential use" • Objection that Its not clear how this policy ties-in with or complements 6.37. Employment uses are defined as B Class uses here whereas they are referred to more widely and in accordance with NPPF at 6.37. Definition should be consistent with 6.37. • Avoid mistakes like allowing the Fortfield to become a housing instead of an employment area. • policy should be reworded to recognise that employment uses can encompass a number of uses in addition to Class B or sui generis uses, in particular retail uses, which provide significant local employment opportunities • object - no evidence of justification for proposed employment land. <p>Officer Comment: comment noted. Changes are proposed to clarify that employment uses include non B Use class uses.</p>	Changes are proposed to clarify that employment uses include non B Use class uses.
322	Jobs in Agriculture and the Rural Economy	No comments logged.	
323	E4 - Rural Diversification	<p>One objection was received stating that policy needs to mention compatibility with the historic environment. The Plan has been amended in this respect.</p> <p>Officer Comment: comment noted and change proposed.</p>	Policy now mentions compatibility with the historic environment
324	E5 - Small Scale Economic Development in Rural Areas	<p>Eight objections were received. Most relate to the inappropriateness of providing economic development of an industrial nature in rural areas. There is also reference to the existing overprovision of employment land/lack of need. A definition is sought. Conversely one objector supports the principle but feels the uses are too restrictive.</p> <p>Officer Comment: comments noted but no changes are proposed.</p>	
325	Matching New Homes to Job Opportunities in Rural East Devon	No comments logged.	Text deleted - it largely replicates Strategy 31.
326	E6 - New Employment Provision in Association with Residential Development	<p>Comments made included:</p> <ul style="list-style-type: none"> • New employment provision in association with residential development will not be supported by residents. • Object - It is important that the need and provision of employment floorspace should be justified so as to ensure that it is not brought forward unnecessarily and lead to the ineffective and inefficient use of land. • Object - Employment provision for every 10 homes built is entirely unnecessary and overly prescriptive when the statistics clearly outline most incomers are retiring. 	Policy deleted because it largely replicates Strategy 31.

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		<ul style="list-style-type: none"> • Objection raised to policy of seeking employment provision with new residential development on the basis that it may not meet a local need/be appropriately sited and a better policy approach would be to seek a contribution for provision. • Objection to policy seeking new employment provision in association with residential development as this is seen as generating too much employment land not matching needs. Considered that any employment should be restricted to B1 uses. • E6 - New Employment Provision in Association with Residential Development is unnecessary and overly prescriptive. • Objection that it is totally inappropriate to apply such a generic and blanket policy to all residential developments of 10 units or more. • Support E6 but suggests that reference should also be made to development viability within this policy. • Providing work places as a pay off for residential development is a good idea but units cannot be too close to residential units or scattered around villages due to access and noise levels. • New Employment Provision in Association with Residential Development is excessive and unnecessary, should allow financial contribution instead. • E6 - New Employment Provision in Association with Residential Development threshold is too low. Home-working should be incorporated into smaller schemes. Policy should also address noise/environmental nuisance. • objects - needs a thorough definition to be credible. <p>Officer Comment: comment noted and policy is proposed for deletion.</p>	
327	Extension of Established Employment Sites in Urban and Rural Areas	<p>Comments made included:</p> <ul style="list-style-type: none"> • Concern expressed over poor wording and/or misprint in plan text. • Objects to blanket expansion of successful industrial areas. Does not stipulate the size of renewable energy production. • I object to a blanket allowance of 10% increase once an industrial estate has reached 80% of its capacity. This means that an industrial site can increase year on year for the next 13 years. <p>Officer Comment: comment noted – see below.</p>	
328	E7 - Extensions to Existing Employment Sites	<p>Comments made included:</p> <ul style="list-style-type: none"> • objects because will damage countryside unnecessarily, would be difficult to check claims of landowners and not justified • Support - Existing successful employment sites such as Greendale Business Park will be able to benefit from this policy • Given the vast overprovision in the amount of employment land being proposed within the District there is no case for allowing expansion of existing employment sites as Policy E8 allows. • E7 - Extensions to Existing Employment Sites is damaging to countryside, open to abuse and not justified 	Proposed that policy is amended to provide environmental criteria and to also specify that it is only a single expansion that is allowed in the plan period.

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		<ul style="list-style-type: none"> • Employment sites should not be given elastic boundaries - this gives developers a free hand to expand without regard to neighbours • Respondent objects and considers that this proposal will allow developers unrestricted expansion without any clearly defined boundaries, a dangerous precedent. • Strong support for E7 - Extensions to Existing Employment Sites • Policy is too weak, open to abuse and can't be accurately monitored • I object. This text needs to be extended to prevent such expansion where the site is in AONB or SSI or has similar provisions. The same would apply where the increased development would be in a flood plain. <p>Officer Comment: comment noted and it is proposed that policy is amended to provide environmental criteria and to also specify that it is only a single expansion that is allowed in the plan period.</p>	
329	Succession Housing on Farms	No comments logged.	
330	E8 - Agricultural Development and Succession Housing	<p>Two representations were received, one of which supports the Policy. The other feels it is overly restrictive and paragraph 3, tying all existing dwellings on the farm, will act as a severe financial deterrent to uptake of this policy.</p> <p>Officer Comment: comment noted and minor change proposed.</p>	Minor wording amendment to clarify policy
331	Town Centre Vitality	<p>One Objection was received on the grounds that additional text should be included making it clear that existing employment and trading uses will not be converted into residential developments.</p> <p>Officer Comment: comment noted but no change is proposed.</p>	
332	E9 - Town Centre Shopping Areas	No comments logged.	
333	The Primary Shopping Frontages in East Devon Towns	No comments logged.	
334	E10 - Primary Shopping Frontages	<p>Two objections were made, the first objects to the failure to show Hiltons Yard (West St) and Regent building in Market Square in Axminster as Primary Shopping Frontage, the second over poor wording in plan text</p> <p>Officer Comment: comment noted but no changes are proposed,</p>	
335	Large Retail Stores and Supermarkets	<p>One objection was made that the sequential test should not be the only criteria against which new large retail stores and supermarkets be assessed. The policy text at 336 was amended to reflect this.</p> <p>Officer Comment: comment noted but no changes are proposed.</p>	
336	E11 - Large Stores and Retail	Three objections were made. The first on the basis that the sequential test should not be the only criteria against which new large retail stores and supermarkets be assessed, the second that 500sq m threshold is disproportionate and	Clarification of the criteria to be used.

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	Related Uses in Area Centres	significantly below the default threshold of 2,500sqm set out in the NPPF and the third that Paragraph 2 should contain the requirement that such developments will not be permitted on AONB or SSI land. Officer Comment: comment noted and a minor change is proposed to refer to wider plan policies.	
337	Local and Neighbourhood Stores and Centres	No comments logged.	
338	E12 - Neighbourhood Centres and Shops	No comments logged.	
339	Use of Upper Floors of Shops	No comments logged.	
340	E13 - Use of Upper Floors in Shopping Developments	No comments logged.	
341	Village Shops and Post Offices	No comments logged.	
342	E14 - Change of Use of Village Shops or Services	One support received.	
343	Shops in the Open Countryside and Farm Shops	No comments logged.	
344	E15 - Retail Development in Rural Areas outside Built-up Area Boundaries	Five representations were received, of which 4 requested that the policy be tightened and at least 90-95% local goods only be sold and the last expressed concern that Darts Farm could be adversely affected. Officer Comment: Noted but no changes proposed.	
345	Tourism in East Devon	Representations were keen to see EDDC supporting tourism to a greater extent. Suggestions include high quality restaurants and hotels as well as green tourism should be the focus for tourism policy, tourism in East Devon should be promoted as a major part of the economy, development should not be permitted which would harm the natural economy/tourist industry. Officer Comment: Noted but no changes proposed.	

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346	E16 - Proposals for Holiday or Overnight Accommodation and Associated Facilities	Comments made included: <ul style="list-style-type: none"> • Bourne Leisure consider that policy E16 should be redrafted to support the enhancement of existing tourism facilities and accommodation, both within existing settlement boundaries and within the coastal zone to encourage new facilities / accommodation. • E16 - Proposals for Holiday or Overnight Accommodation and Associated Facilities is confused and needs to clarify what will be permissible where Officer Comment: Noted but no changes proposed.	
347	The Main Centres of Holiday Accommodation	No comments logged.	
348	E17 - Principal Holiday Accommodation Areas	No comments logged.	
349	Resisting the Loss of Holiday Accommodation	No comments logged.	
350	E18 - Loss of Holiday Accommodation	Comments made included: <ul style="list-style-type: none"> • Supports the policy, however suggests that it needs to provide a more robust commitment to preventing holiday use sites from being granted change of use. Seaton cannot lose any more holiday accommodation. • Supports the policy, however suggests that it needs to provide a more robust commitment to preventing holiday use sites from being granted change of use. Seaton cannot lose any more holiday accommodation. • Should be stronger commitment to protect holiday accommodation • Policy E18 should be amended or a new policy added, to permit the development of open land within an existing site, and the extension of existing holiday parks in the coastal zone onto adjoining land as part of any 'roll-back' management plan. Officer Comment: Noted but no changes proposed.	
351	Holiday Accommodation Parks and Caravan/Chalet Sites	No comments logged.	
352	E19 - Holiday Accommodation Parks	Comments made included: <ul style="list-style-type: none"> • Respondent considers policy E19 should be deleted from the plan and Policy E17 amended to recognise and balance the need to protect and enhance the natural environment with promoting appropriate tourism development which benefits the local economy. 	

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		<ul style="list-style-type: none"> • E19 - Holiday Accommodation Parks - support policy but it ought to make provision for development on sites that are not 'within, or in close proximity, to an existing settlement' • Respondents queries - what are 'designated landscape areas'? Should we have used the terms AONB or SSI? How would these criteria relate to caravan park developments, for instance. Item 3 should be re-written to remove the words 'best and most versatile'. <p>Officer Comment: Noted but no changes proposed.</p>	
353	Visitor Attractions in East Devon	<p>Comments made included:</p> <ul style="list-style-type: none"> • Crealy should have a specific permissive Policy and the Plan should promote its role as a major tourist attraction <p>Officer Comment: Noted but no changes proposed.</p>	
354	E20 - Provision of Visitor Attractions	<p>Comments made included:</p> <ul style="list-style-type: none"> • proposes additional wording so point 6 reads 'it would not use the best and most versatile agricultural land • Crealy should have a specific permissive Policy and the Plan should promote its role as a major tourist attraction • E20 - Provision of Visitor Attractions should also refer to not using best and most versatile agricultural land • This policy in the Adopted Local Plan has led to the uncontrolled expansion of visitor attractions in particular at Crealy. Crealy should be defined on the Proposals Map and there should be a presumption against devt outside permitted areas, • Provision of Visitor Attractions should not use best or most versatile agricultural land <p>Officer Comment: Noted but no changes proposed.</p>	
355	25. Recreation and Community Facilities (Chapter)	<ul style="list-style-type: none"> • Sport England see lack of evidence, seek funding through CIL, RC1 weakens protection of sports fields in East Devon (doesn't accord with NPPF), promote active design <p>Officer Comment: Noted but no changes proposed.</p>	
356	Existing Recreation and Sports Facilities	No comments logged.	
357	RC1 - Retention of Land for Sport and Recreation	<ul style="list-style-type: none"> • Support the policy but suggest that it needs to consider the both open space in ownership of local authority and private ownership. Highlights need for football pitches in particular in Seaton. • Support the policy but suggest that it needs to consider the both open space in ownership of local authority and private ownership. Highlights need for football pitches in particular in Seaton. • RC1 - Retention of Land for Sport and Recreation • The policy wording is onerous. The reference to 'open space' could easily be misinterpreted. • Objection to the loss of open space as part of the allocation of land at the Knowle in Sidmouth for residential development 	

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		Officer Comment: Noted but no changes proposed.	
358	New Recreation and Sports Facilities	<ul style="list-style-type: none"> • Objection raised to plan as it is unduly-restrictive in respect of limiting motorsports in the District • The respondent questions whether the provision of private sports fields be encouraged and permitted? Officer Comment: Noted. Change proposed to refer to permanent motor sports sites and delete last sentence of Para 25.3.	Minor change to text.
359	RC2 – New Open Space, Sports Facilities and Parks	Comments made included: <ul style="list-style-type: none"> • Support this policy however highlights the fact that it is hard to meet shortfalls in provision considering much available land is subject to planning decisions and applications. Need to identify recreational needs and land use implications. • Supports this policy however highlights the fact that it is hard to meet shortfalls in provision. • In the case of Seaton, NPFA guidelines for sport and recreation in relation to the size of the parish's population indicates that the town has a serious shortfall in land. Policy should place a greater emphasis on meeting shortfall above other objectives. • As drafted this would appear to allow large scale sports stadia, entertainment venues and other potentially very large and intrusive structures. Officer Comment: Noted changes proposed to refer to allotments.	Minor change to text.
360	Allotments	No comments logged.	No changes proposed
361	RC3 – Allotments	Comments made included: <ul style="list-style-type: none"> • This policy fails to address the provision of new allotments and should be reworded to include an element which encourages the provision of new allotments. If EDDC are not interested in operating new ones, the private sector might. Officer Comment: Noted but no changes proposed.	No changes proposed
362	Countryside Recreation	Comments made included: <ul style="list-style-type: none"> • We remind the local planning authority that the AONBs have drafted supplementary guidance for equestrian development and trust that this will provide a useful tool in support of this policy once adopted. • We remind the local planning authority that the AONBs have drafted supplementary guidance for equestrian development and trust that this will provide a useful tool in support of this policy once adopted. Officer Comment: Noted but no changes proposed.	No changes proposed
363	RC4 - Recreation Facilities in the Countryside and on the Coast	Comments made included: <ul style="list-style-type: none"> • The policy wording is imprecise. For example, does the presumption in favour of outdoor recreation facilities allow for the erection of large leisure buildings? Policy should resist such developments. • Objection that the plan does not make sufficient provision for recreational access to the River Exe/Estuary. 	No changes proposed

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		Officer Comment: Noted but no changes proposed.	
364	Community Facilities and Buildings	One objector requests that 'places of worship' be added to the text (this has now been done) Officer Comment: Noted - change proposed.	'places of worship' added to the text
365	RC5 - Community Buildings	Three representations were received, two supporting the policies, one considering that the policy wording currently proposed is onerous. Officer Comment: Noted but no changes proposed.	
366	New Community Facilities	No comments logged.	
367	RC6 - Local Community Facilities	Two supporting representations received. Officer Comment: Noted but no changes proposed.	
368	Shared Community Facilities and Buildings	Leisure East Devon object on the basis that the plan does not adequately promote sporting and community facilities and shared community facilities and buildings at Ottery, Axminster and Sidmouth. Officer Comment: Noted but no changes proposed.	
369	RC7 - Shared Community Facilities	Two supporting comments were received with a further concern expressed over length of first sentence Officer Comment: Noted but no changes proposed.	
370	26. Transportation and Communications (Chapter)	No comments logged.	
371	Telecommunications	No comments logged.	
372	TC1 – Telecommunications	A spelling error was pointed out (now rectified) Officer Comment: Noted and change proposed.	Amended spelling to read colleges.
373	TC2 - Accessibility of New Development	Two respondents supported the policy (one also wished to resist loss or reduction in parking), one expressed concern about accessibility and transport in Honiton and one wished the policy to be amended to recognise that, particularly in rural areas, tourism uses may only be accessible by private car. Officer Comment: Noted but no changes proposed.	
374	Traffic and Transport	Comments made included: <ul style="list-style-type: none"> • Objection to statement implying a town centre management plan has been conducted for Axminster 	Last sentence of Para 26.8 proposed for deletion.

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		Officer Comment: Noted and text change proposed.	
375	TC3 - Traffic Management Schemes	Comments made included: <ul style="list-style-type: none"> TC3 - A small drafting point in the Policy: it is insufficient for a new traffic management proposal to meet the broad policy objective by achieving a single itemised point in the policy: a more holistic approach is required. Officer Comment: Noted but no changes proposed.	
376	Walking, Cycling and Horse Riding	Comments made included: <ul style="list-style-type: none"> A stronger statement to the effect that multi-use will be considered at the outset. Include a statement to the effect that landowners / manager/ tenants should be consulted at the outset when routes are proposed. Officer Comment: Noted but no changes proposed.	
377	TC4 - Footpaths, Bridleways and Cycleways	Comments made included: <ul style="list-style-type: none"> pleased to note development proposals will seek opportunities to "join, upgrade or extend existing or proposed networks" Planning conditions for providing footpaths etc with a development should always be enforced prior to buildings use TC4 - A more proactive approach should be taken to the provision of Footpaths, Bridleways and Cycleways Officer Comment: Noted but no changes proposed.	
378	Safeguarding of Former Transport Routes and Their Green Re-use	No comments logged.	
379	TC5 - Safeguarding Disused Railway Lines	<ul style="list-style-type: none"> Whilst the broad thrust of the policy is to be applauded the wording needs to be more pragmatic to read "...disused railway lines which have realistic potential..." Officer Comment: Noted but no changes proposed.	
380	Park and Ride Services	Comments made included: <ul style="list-style-type: none"> Objection to the fact that the plan does not actively plan for and seek to accommodate a park and ride service in Honiton given congestion in the High Street Officer Comment: Noted but no changes proposed.	
381	TC6 - Park and Ride and Park and Share/Change	Comments made included: <ul style="list-style-type: none"> Object to Park and Ride and Park and Share/Change at Sidford as it would not serve whole community Officer Comment: Noted but no changes proposed.	
382	Highway Access	Comments made included:	

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		<ul style="list-style-type: none"> A ban or restriction should be put on all HGV, and possibly tourist coaches, entering Northcote Lane which is not sufficiently wide enough. <p>Officer Comment: Noted but no changes proposed.</p>	
383	TC7 - Adequacy of Road Network and Site Access	<p>Comments made included:</p> <ul style="list-style-type: none"> Support expressed for development sites that have existing access to public roads so as to minimise impacts of development. Supports statement that permission will not be granted when development would be detrimental to the safety of the local or wider highway network. Also supports idea that planning obligations will be used to ensure off-site highway improvements. Objection to the allocation of the Plumb Park site in Exmouth on the basis of inadequacy of access roads and access arrangements. This policy introduces conflict with national policy or NPPF. As such the policy should be deleted or the last sentence of point 1 and the whole of point 2. Representation express concern about adequacy of wording on "Adequacy of Road Network and Site Access" advising that the Wainhomes site in Feniton has been allowed at public inquiry at a very dangerous site in the village, close to the primary school. Wording is overly restrictive on applicants. Should be left to S278 Agreements under the highway act. <p>Officer Comment: Noted but no changes proposed.</p>	
384	Land for Highway Improvements	No comments logged.	
385	TC8 - Safeguarding of Land Required for Highway and Access Improvements	<p>Comments made included:</p> <ul style="list-style-type: none"> Suggested improvement to A35 at Offwell. This policy is Supported, particularly the safeguarding of land for the completion of Dinan Way. Our clients will facilitate the Dinan Way link provided it is commercially sensible for them to do so and we'd suggest that in reality this means that they would require value from strategic allocations in the area and/or development on their site. <p>Officer Comment: Noted but no changes proposed.</p>	
386	Parking Provision	<ul style="list-style-type: none"> Objection that a park and ride system should be set up in Honiton as soon as possible, or Honiton local shops face the loss of substantial tourist coach trade. <p>Officer Comment: Noted but no changes proposed.</p>	
387	TC9 - Parking Provision in New Development	<p>Comments made included:</p> <ul style="list-style-type: none"> Whilst supporting the intentions of this policy we wish to see the words "off street" added after "1" and "2" in the first paragraph 	Proposed change in respect of reference to 'smallscale' definition

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		<ul style="list-style-type: none"> Object - We are concerned that the Policy is requiring all major developments to provide charging points in all instances. Our view is that they should be encouraged as opposed to being considered essential which is what the policy is suggesting. Objection that no mention has been made of the effect that a new development would have on current on-street parking of existing homes. Permissions should not be granted where it could reduce the amount of parking of existing houses Respondent expresses concerns over "Parking Provision in New Development" and advises that this provision has been openly breached in the case of proposed developments for Feniton and commitment required that EDDC agrees with this policy, and will enforce Provision of 1 cycle space per dwelling needs to be increased to 2. <p>Officer Comment: Noted proposed in respect of reference to 'smallscale' definition</p>	
388	TC10 - Rear Servicing of Shopping/ Commercial Development	<p>Comments made included:</p> <ul style="list-style-type: none"> Whilst we are broadly supportive of the provision of electric vehicle charging points we are concerned that the policy will be applied too rigidly. The requirement is at odds with the demand for such provision. <p>Officer Comment: Noted but no changes proposed.</p>	
389	Roadside Service Facilities	<p>No comments logged.</p>	
390	TC11 - Roadside Service Facilities	<p>Comments made included:</p> <ul style="list-style-type: none"> Policy highlights the lack of a similar policy for roads which are not trunk roads or motorways. <p>Officer Comment: Noted but no changes proposed.</p>	
391	Aerodromes and Safeguarding	<p>No comments logged.</p>	
392	TC12 – Aerodrome Safeguarded Areas and Public Safety Zones	<p>Comments made included:</p> <ul style="list-style-type: none"> Considered that the developments in these areas to be subject to consultation should include solar farms as they may cause dazzle and temporary blindness to incoming pilots. <p>Officer Comment: Noted but no changes proposed.</p>	
393	PART THREE – NEIGHBOURHOOD PLANNING (Section)	<p>Two objections were received. Both suggest that the neighbourhood planning section demonstrates a fundamental misunderstanding of the provisions set out in the Localism Act as such plans can not overwrite Devt Mngt policies</p> <p>Officer Comment: Noted but no changes proposed.</p>	
394	27. Neighbourhood Plans in East Devon (Chapter)	<p>Response sets out why Chardstock Parish Council is producing a Neighbourhood Plan.</p> <p>Officer Comment: Noted but no changes proposed.</p>	

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395	Local Initiatives and Neighbourhood Planning	No comments logged.	
396	NP1 Neighbourhood Planning in East Devon	<p>Objections received on the basis that Policy NP1 requires clarification about what “over-write” means and how it differs from “supersede”, Strategies 7, 27 and 35 would not allow a neighbourhood plan to bring forward housing on the edge of Lyme Regis in East Devon District and in villages with a designated boundary there should be a presumption in favour of a maximum of 25 houses and/or half a hectare of land for employment purposes coming forward during the plan period. One representation supports detail of Part 3 of Local Plan .</p> <p>Officer Comment: Noted but no changes proposed.</p>	
397	Community Plan Making	<p>Two observations received: Chardstock Parish Council understand that a Neighbourhood Plan has the force of law once it has been examined and approved and will compliment the strategic direction of the Local Plan. Feniton residents went through the process of creating a village plan 70% of residents were against 'mass' development but happy to take 35, yet with current applications are feeling disillusioned.</p> <p>Officer Comment: Noted and changes proposed.</p>	Text amended to add clarity
398	Process for Producing a Neighbourhood Plan	No comments logged.	
399	Neighbourhood Planning Team	<p>Suggestion that 3 Paragraphs could be inserted in the script of the new local plan, around paragraphs 17.2, 17.2 - Climate Change Act, Renewable Energy Strategy, Planning Act</p> <p>Officer Comment: Noted but no changes proposed.</p>	
400	Develop a Communication Strategy and Vision and Objectives	No comments logged.	
401	Discussions with Stakeholders and Identifying Strengths and Opportunities	No comments logged.	
402	Defining the Area to be Covered	No comments logged.	

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403	Check for Conformity and With the Community	No comments logged.	
404	Developing the Plan and Policies	No comments logged.	
405	Site Proposals Maps	No comments logged.	
406	Sustainability Appraisal and Appropriate Assessment	Officer Comment: No comments received but position with regard to sustainability appraisals and strategic environmental assessment has been updated.	Update guidance on the need to carry out an SA/SEA
407	Develop an Implementation Plan	No comments logged.	
408	Independent Examination	No comments logged.	
409	Examiner's Report	No comments logged.	
410	Referendum	No comments logged.	
411	Implementing & Monitoring the Plan	No comments logged.	
412	Support Available	No comments logged.	
413	APPENDIX A – POLICIES FOR VILLAGES OF EAST DEVON (Appendix)	One supporting representation, one suggestion of a suitable development site at West Hill and one request for further explanation of the process. Officer Comment: No changes proposed.	
414	APPENDIX B – NATIONAL PLANNING POLICY FRAMEWORK – GLOSSARY OF TERMS (Appendix)	Comments made included: <ul style="list-style-type: none"> • Definition of renewable low carbon energy should recognise contribution of waste technologies. • GLOSSARY OF TERMS (Appendix)- Protected landscapes require assessments for major developments, glossary needs to define major developments • Objection that the definition in the plan of windfall sites in Appendix B is to vague with a specific concern raised about whether it includes houses built in existing back gardens • Objection that In Appendix B it would be useful to include a pithy definition of AONBs. Officer Comment: The glossary is proposed for amendment by reference to amended by new site size definitions.	Glossary is proposed for amendment by reference to amended by new site size definitions.

Ref Pnt	Subject or Policy	Officer Summary and Commentary on Key Issues Raised in Representations (Blank Box = No Comments Logged)	Proposed Change (Blank Box = No or Very Minor Change)
415	APPENDIX C – SCHEDULE OF HOUSING SITES AND HOUSING NUMBERS (Appendix)	<p>Comments made included:</p> <ul style="list-style-type: none"> • Appendix C - There is an error on this table. Alfington is listed as receiving eight dwellings in the local plan. This should be changed to five, in accordance with Alfington's correct allocation. • There is an error in Appendix C - The housing number should be changed from 50 to 5 for Aylesbeare. • Figures appear to underestimate the true picture (of past completions/net commitments). • housing number for Alfington should be 5 not 8 and for Aylesbeare should be 5 not 50 • Concern expressed about the recording of past housing completions in Appendix C and suggested that this will under-estimate contribution from Windfall sites • Object to Manstone, Sidmouth proposal for housing • objects to non strategic allocation of 100 homes at Sidmouth, The Knowle and Port Royal • The figure given for proposed new housing for Aylesbeare given in the table at C3 of Appendix C under the heading "Local Plan Non Strategic Allocations" is wrong. It reflects an earlier, superceded figure • There is an error at Appendix C, C3 against Clyst Hydon under the column 'Proposed New Local Plan Non-Strategic Allocations' there is a blank. It does not correspond with the figure of '5' set out in Strategy 27. • Objection to provision of only 5 new dwellings in Brampford Speke. • Having 594 houses in the pipeline or already built, and with a more careful assessment of Sidmouth's housing needs, 100 more houses to be non-strategically planned is excessive. • Appendix C should be amended to note that Ebford could take an additional 25 houses. • Objection to the failure of the plan to show SHLAA submission sites and therefore not allowing respondents to object to these sites. Suggested that plan with SHLAA sites should be reconsulted on. • Objection that Proper consultation with residents about the location of new building sites must be delivered before they are included in the New Local Plan. • At Appendix C the respondent advises - Whilst I support the quoted allocation I note that planning has already been granted for 50 homes in Feniton, in excess of the quoted 35 • Objects to lack of SHLAA site ref points. Interactive Map should be referred to. • Alfington should refer to 5 not 8 houses • Appendix C is referred to as Appendix 3 in all of the towns strategies and at Strategy 2. • APPENDIX C – SCHEDULE OF HOUSING SITES AND HOUSING NUMBERS (Appendix) loss of the Knowle would result in loss of tourists • Overall housing numbers in East Devon are too high and AONB's should be protected from employment and housing development • Please do not build over the Knowle park area . I believe we do not need so many new-build houses as your report suggests <p>Officer Comment: Changes are proposed to completely update table with the most up to date available data.</p>	Updated table to 31 March 2013 basedate. Minor changes to text.

