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VIA EMAIL

12 January 2023

Dear Mr Freeman

Draft East Devon Local Plan 2020 to 2040

Thank you for the opportunity to comment on the draft East Devon Local Plan 2020 to 2040.

Devon County Council is broadly supportive of the aims of the draft East Devon Local Plan 2020 to 2040. The Council has some comments with regards to strategic issues relating to climate change, infrastructure provision, the spatial strategy, transport, education, minerals, historic environment, flood risk management, health and wellbeing, gypsy and traveller provision, landscape, and economy. Some overarching comments are provided below in this letter, with Appendix 1 providing a table with detailed comments regarding the plan policies, Appendix 2 containing additional overarching Flood Risk allocation comments and Appendix 3 providing further transport and highways comments on each of the major settlements in the District.

Climate change

DCC welcomes the focus on climate change in the draft plan vision, objectives and policies but thinks that this needs to be strengthened in line with the Devon Carbon Plan to reflect the scale and urgency of the climate emergency. We would like to see more reference to and alignment with the Devon Carbon Plan within the East Devon Local Plan to strengthen this.

Infrastructure provision

We note this is a draft plan and details of infrastructure requirements have not yet been identified and will be considered as you undertake further work to develop the East Devon Local Plan. The County considers it essential that infrastructure necessary to support the development proposed in the local plan is provided in an appropriately phased and timely manner. It is also essential that appropriate funding mechanisms to deliver this infrastructure are in place, in particular to ensure necessary education, transport and community infrastructure is provided.

As Local Education Authority, we need to ensure that there is a coordinated approach to planning and providing education infrastructure within East Devon and the neighbouring districts, including for Further Education. In order to accommodate the proposed housing development, it is imperative that provisions are made for the expansion of existing education infrastructure in existing settlements, including

primary, secondary and special schools. It is also essential that school catchment areas are reviewed where this would help to mitigate the impact of house building and to ensure provision of school places for children in their local schools. DCC requests that education contributions are secured via S106 agreements and not CIL, in accordance with Devon County Council's Education Approach for Developer Contributions (current version December 2021).

Transport improvements will be identified on a site by site basis as the plan develops. We are currently updating the strategic transport model covering Exeter and the wider Greater Exeter area and once this is completed in the next few months we can use this to identify what transport improvements are required to mitigate the impacts of additional trips from proposed development sites. This modelling work will inform our final view about the spatial strategy in the East Devon Local Plan.

The spatial strategy and proposed new community

DCC largely supports the spatial strategy contained in the draft Local Plan in order to locate development in the most sustainable locations where new housing is close to employment, services and facilities and can reduce the need to travel. It is suggested that this principle should include encouragement of mixed used development at Service Villages in order to retain vital local facilities, particularly where there is a primary school.

However, the Council questions whether the development of another new community is the best approach from a transport and traffic point of view, and suggests that greater emphasis on expanding existing towns would be better. Given the lack of a rail service in the vicinity of the proposed preferred new community, it is likely to have significant impacts on Junctions 29 and 30 of the M5, other important road junctions in the area such as Clyst St Mary roundabout and the local road network in and around Exeter. Significant highways improvements are likely to be required as well as the provision of high quality walking and cycling routes linking to existing routes, employment areas and schools.

As Waste Planning Authority, DCC considers Hill Barton to be strategically significant in terms of waste management for Exeter and the wider area and should therefore not be constrained by non-waste development in close proximity as supported by Waste Plan Policy W10. The proposed new community would be impacted by noise, odour, traffic, dust etc generated by the operations at these waste sites. Given this, it is considered that parts of the preferred option (Option 1) and Option 2 around the existing waste uses are not currently suitable for residential development. The Waste Planning Authority would object to the loss or constraint of any waste management facility and it would be necessary to deliver replacement sites at an alternative location to ensure adequate waste management capacity.

Adult Social Care and Children's Services

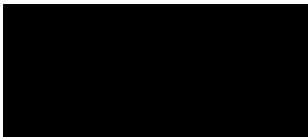
DCC fully supports the Team Devon approach to housing in support of the Housing Task Force and the upcoming and jointly funded Devon Housing Commission which will be led by Exeter University. We welcome the Local Plan's proposed tenure mix of affordable housing and highlight the need to protect affordable housing for local populations whose health and wellbeing may be affected by not being able to access affordable quality housing, particularly those who work in lower paid sectors supporting local economies, communities, key workers and transient populations.

We highlight the importance of provision of housing for Essential Local Workers (as defined in the NPPF), in particular Social Care staff to address the current crisis in employment and retention of sufficient carers, nurses and social workers to look after the vulnerable. We are therefore pleased to see that Strategic Policy 40 includes priority for key workers within the local eligibility criteria for First Homes. We also welcome Strategic Policy 42 due to the importance of providing for groups which may not be catered for under conventional housing provision such as older people and younger adults who may have learning or physical disabilities or mental health issues.

DCC welcomes Strategic Policy 41 but would like to strengthen the elements to support provision of a more diverse supply of housing for older people, in particular affordable rented accommodation such as extra care housing and adapted housing for people with specialist needs. We are currently updating our evidence base on the need for extra care housing within the County. Drawing on this, we would welcome a discussion on how to make adequate provision for extra care housing in suitable locations within East Devon including securing the land and delivering the facilities.

If you have any queries, please do not hesitate in contacting me.

Yours sincerely,



Mike Deaton
Chief Planner

Appendix 1 – Detailed DCC comments on the draft East Devon Local Plan policies and supporting statement

Policy/section	Issue	DCC Comments
Chapter 1 – Introduction		
Supporting Statement Chapter 1 Para 1.9	Infrastructure	It is essential that infrastructure necessary to support development proposed in the East Devon Local Plan is provided in an appropriately phased and timely manner with appropriate funding mechanisms, in particular to ensure necessary education, transport and community infrastructure.
	Education	The County’s School Place Planning team is particularly concerned that underpinning the plan there must be a sound financial strategy that recognises there is going to be an affordability gap that needs to be manageable and does not place an over-burden on local authorities and / or lead to infrastructure being undelivered, particularly for education infrastructure. We would like to see more emphasis on the need to provide access to good quality education and skills and supporting the most vulnerable.
Chapter 2 – Vision and objectives of the plan		
Vision Para 2.3	Climate Change	<p>DCC welcomes the focus on climate change in the local plan vision and objectives but thinks that this needs to be strengthened in line with the Devon Carbon Plan to reflect the scale and urgency of the climate emergency. It is considered that the vision as it is currently described doesn’t help set the objectives and policies in the Plan. It is suggested that the vision could also describe what East Devon will look like in the future. What’s the East Devon the plan is trying to create? What will each size of settlement look like? How will people live in those settlements? How will they move between settlements? How far will they need to travel to access different types of services? From that, the spatial strategy can begin to plan to enable that vision to be implemented.</p> <p>On page 25, an economic vision is proposed, which feels more like the vision for the plan, but the environmental and social inclusivity aspects of this economic vision need strengthening to help achieve sustainable development. It is considered that the plan seems weighted towards economic development, rather than sustainable development.</p>
Table 1. Plan Objectives	Climate Change	Objective 2: The NPPF and the Devon Carbon Plan expects spatial planning to deliver ‘radical reductions in greenhouse gas emissions’, reflecting the need to achieve a 50% reduction in greenhouse gas emissions (GHG) emissions by 2030 (From 2010 levels), which is the trajectory

	Historic Environment	<p>required to meet the UK's target of a 78% reduction in GHG emissions by 2035 from 1990 levels. The wording of 'moves the district towards...' is not urgent enough given the 2030 target. We suggest revised wording of "To ensure all new development contributes to a radical reduction in greenhouse gas emissions by 2030 (50% reduction on 2010 levels) to achieve net-zero by 2040...".</p> <p>Objective 7 only refers to the district's built heritage. East Devon contains a significant amount of heritage assets that do not form part of the built environment, such large prehistoric defensive sites like Hembury Hillfort and Stockland Great Castle, concentrations of prehistoric funerary monuments like those at Farway Hill, the waterlogged wooden remains of a late medieval sailing vessel in the mouth of the Axe at Seaton, which are all national important heritage assets and protected as scheduled monuments. However, the vast majority of the heritage assets within East Devon are non-designated heritage assets though some these may be of equal significance as a designated heritage asset and should be considered subject to the policies for designated heritage assets.</p>
Chapter 3 – The spatial strategy of the plan		
<p>Strategic Policy 1 – Spatial Strategy Pg. 13</p>	Transport	<p>DCC largely supports the spatial strategy contained in Strategic Policy 1 in order to locate development in the most sustainable locations where new housing is close to employment, services and facilities and can reduce the need to travel. However, the Council questions whether the development of another new community is the best approach from a transport and traffic point of view and suggests that greater emphasis on expanding existing towns would be better. Further comments on this are provided in relation to Strategic Policies 2 and 8 below.</p>
	Climate Change	<p>In addition, DCC suggests that mixed use development at Service Villages should be encouraged in order to retain existing vital local facilities. Paragraph 3.3, which says that national policy advocates development in rural areas (which the Devon Carbon Plan does, too), contradicts Strategic Policy 1 which only allows 'limited development' in Service Villages. SP1 also appears to contradict Objective 11. Strategic Policy 1 should encourage mixed-use development in Service Villages to contribute to retaining local services, which in turn reduce the need to travel and can contribute to creating 20-minute neighbourhoods between villages. The 'Role and Function of Settlements' paper only considers the location of employment and community services as they are now. It needs to look ahead to consider how a radically different approach to a spatial strategy</p>

	Education	<p>could change the spatial distribution of community services to make settlements lower down the proposed hierarchy more sustainable. For example, East Devon will not improve its distribution of supermarkets or leisure centres (that will make rural villages more sustainable) if Service Villages are not encouraged to grow. Indeed, those rural settlements could lose vital local facilities if they are not encouraged to grow.</p> <p>In terms of education infrastructure, there are some areas identified within the spatial strategy where it may not be possible to mitigate the impact of proposals without significant external funding and therefore these sites and areas may be seen as unsustainable. From an education perspective, development in rural areas will see an increased burden on home to school transport, especially when there is no primary school. In addition, the policy should reflect the key principles of the Education Infrastructure Plan, predominately local schools for local children, with schools being at the heart of the communities.</p>
<p>Strategic Policy 2 – Housing distribution Pgs. 16-17</p>	<p>Transport</p> <p>Education</p>	<p>Since the pandemic, significantly more people work from home, therefore, the demand to travel to large employment areas such as Exeter has reduced. Given we are in a Climate Emergency and need to reduce emissions, particularly from transport, DCC would question if a new community is the best way forward. As seen with Cranbrook, a new community requires significant upfront costs and has high trip rates at the initial phases until significant facilities are provided at the new site. Given the lack of a rail service in the vicinity of the proposed new community, we consider a better option would be to expand development in the existing towns to improve the economy of these areas and make better use of existing facilities. DCC has produced the attached report (in Appendix 3) to look at each of the major settlements in the District and suggest which could accommodate additional development from a transport perspective.</p> <p>Development of the new community will require significant education infrastructure to support the proposed town and a wider area, linked to pressures created by the Local Plan proposals such as at Exmouth and North of Topsham. There is currently no available funding stream to deliver the primary school north of Black Horse at Mosshayne so the plan should reflect this. There is also insufficient primary education capacity to support the proposed level of development in Ottery St Mary. We understand the King’s School is unwilling to expand the school unless it has a new school building. In support of this, DCC’s position is not as stated in paragraph 6.37, which suggests the allocated land can facilitate the expansion of King’s School. This would impact on</p>

		proposals at Ottery St Mary, West Hill, Feniton and Tipton, the latter now being identified in the provisional Schools Rebuilding Programme. In respect of the Service Villages, a number do not have their own primary school or potential safe walking routes (such as Dunkeswell and Exton) and are therefore potentially an unsustainable location for new development due to the need and impact of having to provide additional home to school transport. We are also particularly concerned about primary capacity at Lymptstone. It should be noted that Cranbrook Education Campus is not large enough to support any development over and above what is identified in the Cranbrook DPD. In addition, there will be a need to deliver additional special and post 16 education and skill provision across the area.
Strategic Policy 4 – Employment Provision and Distribution Strategy Pgs. 24-32	Climate Change	The plan has a commitment to sustainable development and sets out an economic vision on page 25. The plan should have an environmental vision and social inclusivity vision to balance the economic vision to enable sustainable development. The principal of Doughnut Economics could be used here which reminds us that economic activity has to function between an environmental ceiling and a social floor.
Strategic Policy 5 – Mixed use developments incorporating housing, employment, and community facilities Pgs. 37-38	Transport	Mixed use development sites are supported to reduce the need to travel. Delivery of employment and housing at each site need to come forward in parallel to reduce travel from the beginning.
Chapter 4 – How we have assessed the potential suitability of sites for development		
Chapter 5 – Future growth and development on the western side of East Devon		
Strategic Policy 8 – Development of a second new town east of Exeter Pg. 46-47	Transport	Since the pandemic, significantly more people work from home, therefore, the demand to travel to large employment areas such as Exeter has reduced. Given we are in a Climate Emergency and need to reduce emissions, particularly from transport, DCC would question if a new community is the best way forward. As seen with Cranbrook, it requires significant upfront costs and have high trip rates at the initial phases until significant facilities are provided at the new site. Given the lack of a rail service in the vicinity of the proposed new community, DCC considers a better option would be to expand development in the existing towns to improve the economy of these areas and make better use of existing facilities. It is also not clear how buses will access the site and avoid the existing delays to enter Exeter. Without this they will not be very popular. The number one on

	<p>the hierarchy of energy is development location which would be better met by expanding the existing towns, as it will also support jobs and the economy and vibrant towns, policies later mentioned in the Plan. National research shows that while city centres have seen a decline in footfall since the pandemic, many towns and suburbs have seen an increase. This is supported by more families moving to seaside towns around the UK such as Budleigh Salterton to get a better quality of life.</p> <p>If a new community is required, then the preferred option is the least worst from a transport point of view. However, it is still likely to have significant impacts on J29 and J30 of the M5 once all other development is added in, as well as on Clyst St. Mary roundabout which is already at capacity during busy periods. Improvements to the airport junction off the A30 will likely be required as well as the provision of high quality walking and cycling routes linking up to existing routes and employment areas / schools etc. This may require significant infrastructure to cross the A30 and / or the M5. Devon County have just started updating the strategic traffic model for Exeter to include not just the proposed development in the East Devon Local Plan, but also to include Teignbridge and Exeter developments to understand the cumulative impact. Once completed, this will give a better indication of the impacts the proposed development will have on the local transport network in and around Exeter and identify areas where improvements will be required to mitigate the impact of the additional trips. This modelling work will inform DCC's final view about the spatial strategy in the East Devon Local Plan.</p> <p>If the new community is developed, we support early delivery of its town centre, but question if this achievable given delays to Cranbrook's town centre. Not having a town centre or new school provision at the beginning of the development would significantly increase trips out of the development.</p> <p>The infrastructure provision specifically mentions road improvements but fails to mention sustainable transport improvements which should be considered first and as more important than road improvements.</p> <p>The new community will generate funding for infrastructure but this will only come along once occupations begin. There will be large infrastructure costs required prior to this and it is not clear how this will be funded.</p>
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	Travelling & Vulnerable Communities	DCC consider that the provision of 15 pitches on one site for travellers for the 2500 homes proposed up to 2040 is insufficient. We understand that EDDC is waiting for the result of the needs assessment, however, it is thought that 30 pitches over 2-3 sites would be more appropriate provision. Similarly, after 2040 the same provision should apply; 30 pitches over 2-3 sites as opposed to just 1 site.
	Economy	<p>Employment Allocation - Employment provision is detailed near to the town centre, but the majority of the employment will be of a strategic scale and therefore less compatible with residential development. Larger scale users and specifically B8 should be considered for allocated locations close to the existing main transport corridors to minimise impacts on housing. This employment allocation is also likely to need to be considered in initial stages of the development in phasing terms. In that way the employment is appropriately master planned, allocated/reserved and delivered. The volume of logistics and scale of buildings should have defined limits, to ensure that an appropriate overall mix of uses is achieved, in line with user demand, but where markets naturally favour the delivery of B8 uses and there is an element of market failure in bringing forward smaller B1 and B2 uses for which there continues to be a pipeline of enquiries.</p> <p>Infrastructure Provision – Can there be a more robust approach required at this stage to ensure the necessary critical infrastructure delivery? There should be provision for Energy Infrastructure, both traditional and encompassing new technologies referenced/required for the New Town providing flexibility of approach in response to emerging market solutions and economic opportunities in the drive towards Net Zero and energy storage. This could include hydrogen if appropriate. Market leaders in terms of domestic, transport and business fuels have yet to fully emerge. District Heating investment is currently taking place and should be encouraged, but not as the only option – we believe that there should be clean growth, but this should also allow new technologies and remain technology neutral. Reference should be made to the economic opportunities from the move towards Net Zero from the document: ‘A Clean Growth Vision for Development in the West of East Devon’.</p>
	Education	DCC welcomes the allocation of land for education infrastructure at the new community. We suggest it should support primary, secondary, special, and post 16 provision; with secondary, post 16 and SEND supporting a wider area. Potential changes to school catchment areas could

	Waste	<p>support the aspirations of the plan within wider area surrounding the proposed community. It should be noted that the education requirements for this site are likely to require the majority of the 23ha of land identified.</p> <p>As Waste Planning Authority, Devon County Council considers Hill Barton to be strategically significant in terms of waste management for Exeter and the wider area and, therefore, should not be constrained by non-waste development in close proximity. This position is supported by Policy W10: Protection of Waste Management Capacity of the Devon Waste Plan. Hill Barton contains established and strategic waste uses that play a significant role in managing Devon's waste. This includes:</p> <ul style="list-style-type: none"> • Inert disposal and recycling facilities; • Composting; • Incinerator Bottom Ash processing facilities; • Waste transfer facilities; • Two energy from waste facilities. <p>This allocation would introduce new residential properties which are highly likely to be impacted upon from noise, odour, traffic, dust etc. generated by the operations at these waste sites. The Waste Planning Authority and other regulatory bodies often received complaints for the existing operations.</p> <p>Given this, it is considered the southern part of the preferred option (Option 1) around the existing waste uses is not currently suitable for residential development. It is considered unlikely these impacts could be mitigated to an acceptable level by any future residential development where they are in close proximity.</p> <p>The Waste Planning Authority would object to the loss or constraint of any waste management facility and, therefore, it would be necessary to deliver replacement sites at an alternative location to ensure the continued availability of adequate capacity to manage Devon's waste. There could be options to ensure sensitive uses are appropriately located away from the waste uses by zoning the new employment areas near the waste facilities, but all development would still need to meet the criteria set out in Policy W10: Protection of Waste Management Capacity, namely that the</p>
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	Minerals	<p>proposal will not restrict existing operations and any proposals would need to be supported by suitable assessments to demonstrate any potential impacts from the existing waste operations can be adequately mitigated for any future sensitive uses.</p> <p>These comments above also apply for the second choice option, Option 2. However, in addition, the southern part of this Option 2 include Greendale Business Park. Greendale also has established and strategic waste uses that play a significant role in managing Devon's waste, this includes a household and commercial waste transfer facility. Part of this option may also not be suitable for residential development and Policy W10 Protection of Waste Management Capacity would apply.</p> <p>The preferred option (Option 1) contains an asphalt plant, within the Hill Barton industrial estate, which is designated as a Mineral Safeguarding Area for Aggregates. Policy M2: Mineral Safeguarding Areas of the Devon Minerals Plan protects mineral infrastructure from sterilisation or constraint by non-mineral development. The Mineral Planning Authority would object to the loss or constraint of this facility by introducing noise/dust sensitive properties in close proximity. To overcome this objection, the asphalt plant would need to be retained without constraint, or moved to an alternative location. The same comments would apply to the second choice option, Option 2, if brought forward.</p>
Strategic Policy 9 – Development within the Enterprise Zone Pg. 49	Economy	<p>There should be no reference made specifically to connections to District Heating. This should instead be a more flexible policy that looks at all potential forms of energy, as new forms of energy generation and supply emerge – this is a fast-moving area and could otherwise unnecessarily restrict development. District Heating investment is currently taking place and should be encouraged, but not as the only option – we believe that there should be clean growth, but this should also allow new technologies and remain technology neutral. The reference to BREEAM requirements should match other employment allocations. Both DCC and EDDC have declared climate emergencies and this should be strongly referenced. Reference should be made to the economic opportunities from the move towards Net Zero from the document: ‘A Clean Growth Vision for Development in the West of East Devon’.</p>
Strategic Policy 10 – Exeter Science Park Pgs. 50-51	Economy	<p>Reference should be made to the economic opportunities from the move towards Net Zero from the document: ‘A Clean Growth Vision for Development in the West of East Devon’.</p>

<p>Strategic Policy 11 – Land north of the Science Park Pg. 51</p>	<p>Economy</p>	<p>Reference should be made to the economic opportunities from the move towards Net Zero from the document: ‘A Clean Growth Vision for Development in the West of East Devon’.</p> <p>Large scale logistics and industrial uses should be considered incompatible with Sowton Village and with the Science Park, due to the close proximity of housing and the high-quality Science Park environment. Any large-scale logistics, or industrial uses close-by would be likely to be intrusive and compromise the attractive existing built character of the local area, both historic and Science Park. This site will attract considerable logistics interest due to close proximity to major transport corridors.</p>
<p>Strategic Policy 12 – High quality employment north of Sowton village Pg. 52</p>	<p>Economy</p> <p>Transport</p>	<p>Large scale logistics and industrial uses should be considered incompatible with Sowton Village and with the Science Park, due to the close proximity of housing and the high-quality Science Park environment. Any large-scale logistics, or industrial uses close-by would be likely to be intrusive and compromise the attractive existing built character of the local area, both historic and Science Park. This site will attract considerable logistics interest due to close proximity to major transport corridors.</p> <p>Employment north of Sowton Village – it is not clear how this will be accessed, whether from the A30 or M5 and a large new junction may be required at significant cost.</p>
<p>Strategic Policy 13 – Exeter Airport and its future operation and development Pg. 53</p>	<p>Economy</p>	<p>Reference should be made to the economic opportunities from the move towards Net Zero from the document: ‘A Clean Growth Vision for Development in the West of East Devon’.</p> <p>Can a source please be attributed to the following statement, otherwise it sounds spurious and hopeful, rather than based in evidence? If no source can be attributed, please state that it’s an aspiration and how likely it may be to achieve this: <i>“It is estimated that it may take up to 5 years for passenger numbers to return to their 2019 levels.”</i></p>
<p>Strategic Policy 14 – Employment land to the east of airport buildings Pg. 55</p>	<p>Economy</p>	<p>Reference should be made to the economic opportunities from the move towards Net Zero from the document: ‘A Clean Growth Vision for Development in the West of East Devon’.</p> <p>There is no reference to any required sustainability standards as with other employment allocations. EDDC should seek uniform sustainability standards (BREEAM) in the pursuit of Net Zero and the declared Climate Emergency.</p>

<p>Strategic Policy 15 - Employment land east of the Airport and north of the A30 Pg. 56</p>	<p>Economy</p>	<p>Reference should be made to the economic opportunities from the move towards Net Zero from the document: 'A Clean Growth Vision for Development in the West of East Devon'.</p> <p>There is no reference to any required sustainability standards as with other employment allocations. EDDC should seek uniform sustainability standards (BREEAM) in the pursuit of Net Zero and the declared Climate Emergency. Other uses like education/training should be referenced noting the Skills Academy and the aeronautical engineering opportunities.</p>
<p>Strategic Policy 16 - Green infrastructure and the Clyst Valley Regional Park Pgs. 58-60</p>	<p>Transport</p>	<p>Provision of enhanced walking and cycling provisions through the Clyst Valley Park is supported, especially as it needs to meet LTN1/20 standards. Developments in the area should look to connect through to this.</p>
<p>Strategic Policy 17 - Development next to the M5 and north of Topsham Pg. 62</p>	<p>Education</p> <p>Transport</p>	<p>DCC will need to consider this allocation alongside the emerging Exeter Local Plan. Provision may be required for a primary site, and contributions will be required for primary, secondary and special education. The proposed Master Plan will need to consider the provision of a 1.8ha primary school site.</p> <p>Land north of Topsham – sustainable transport links across the railway will need to be provided as part of this site as identified in the emerging Clyst Road Access Strategy. It is good this additional crossing is recognised in the policy.</p>
<p>Strategic Policy 18 - Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line Pg. 64</p>	<p>Travelling & Vulnerable Communities</p>	<p>Supportive, in particular paragraphs 5.65 - 5.68</p>
<p>Chapter 6 – Strategy for the development at Principal Centre, Main Centres and Service Villages</p>		
<p>Strategic Policy 19 – Axminster and its future development Pg. 66</p>	<p>Education</p>	<p>Contributions towards education will be required. Due to the lack of CIL funding from the previous plan the proposed new primary school at the strategic site to the east of the town is not currently considered deliverable, and therefore proposals have been developed to expand existing schools which will need to be funded by development.</p>

	Transport	<p>Development in Axminster is supported given it has a high level of internalisation so supports reducing the need to travel large distances to access facilities. The removal of the development around the northern end of the proposed Relief Road is supported given the issues with delivering the infrastructure. Given the relatively short distances to school, station etc, and the fact it has all required facilities within the town, it is suggested that additional development can come forward in Axminster than being proposed, such as sites 01b and 11b which have currently been rejected. Congestion around the George Hotel will need to be addressed but public transport access will be improved with the proposed half hourly frequency rail service to Exeter.</p>
<p>Strategic Policy 20 – Exmouth and its future development Pgs. 69-70</p>	<p>Education</p> <p>Transport</p> <p>Minerals</p>	<p>Proposed development in Exmouth's wider catchment area cannot be mitigated by Exmouth Community College. Therefore, a review of the catchment areas will see the need for a larger school in the proposed new town funded by developer contributions. There will be an opportunity to look at reducing travel distances for some learners through the new town.</p> <p>Development in Exmouth is supported but given the town centre, station and lots of facilities are located in the SW corner, it is difficult for development to come forward close to here. Development around the north and east fringes will need to provide good quality bus services to existing facilities to reduce significant private car trips but are considered better locations than a new community from a transport perspective as would be closer to existing facilities. Development of some of these rejected and second choice sites could help to reduce the need for a new community. Completion of Dinan Way to link to the A376 will help reduce congestion in and around the town centre, but additional developer contributions may be required of the LUF bid is not successful. Additional development in the town would help achieve this.</p> <p>The Mineral Planning Authority welcomes the rejection of site LP_Exmo_20a. The Mineral Planning Authority had previously stated that part of site is within the Mineral Consultation Area, and partly within the Mineral Safeguarding Area. As such, the Mineral Planning Authority objected to the inclusion of this site on the basis that development has the potential to constrain future working within other parts of the Mineral Safeguarding Area, supported by Policy M2 of the Devon Minerals Plan. A Mineral Resource Assessment would be required by EDDC to establish the potential economic value of the sand and gravel resource if it wishes to pursue allocation of this site.</p>

<p>Strategic Policy 21 – Honiton and its future development Pg. 74-75</p>	<p>Education</p> <p>Transport</p>	<p>Honiton Community College would require expansion to meet the need of development in the area.</p> <p>Development here is also supported given the town also has all required facilities and the majority are within walking and cycling distance. More development than proposed could likely be accommodated with good public transport links provided by the bus and rail services as well as improvements to walking and cycling routes. Some of the rejected and secondary sites here should be reconsidered given the close proximity of existing facilities. These will be improved with the proposed half hourly train service to Exeter. Turk’s Head junction and the A30/A35 roundabout will need to be assessed with additional development.</p>
<p>Strategic Policy 22 – Ottery St Mary and its future development Pg. 77</p>	<p>Education</p> <p>Transport</p> <p>Minerals</p>	<p>There is insufficient primary education capacity to support the proposals in Ottery, West Hill and Tipton. Previous conversations with the secondary school (The King’s School) have indicated they will not be willing expand without the provision of a new school site. (The Local Education Authority has not been consulted on the proposals, the position as set out in paragraph 6.37 does not reflect the position of the LEA and Academy.)</p> <p>The town has most facilities and rail stations at Feniton and Whimble are within short distances so additional development is supported here. There are a lot of rejected sites here which could accommodate additional housing instead of a new community that would reduce the need to travel large distances to access local facilities.</p> <p>The Mineral Planning Authority welcomes the rejection of sites LP_GH/ED/26; LP_GH/ED/23; and LP-Otry_01a. These sites are within, or partly within a Mineral Safeguarding Area or a Mineral Consultation Area. As such, the Mineral Planning Authority would object to the inclusion of these sites on the basis that development has the potential to constrain future working within other parts of the Mineral Safeguarding Area, supported by Policy M2 of the Devon Minerals Plan. A Mineral Resource Assessment would be required by EDDC to establish the potential economic value of the sand and gravel resource if it wishes to pursue allocation of this site.</p>
<p>Land at Thorne Farm (Otry 09)</p>	<p>Minerals</p>	<p>It is noted this site is within a Mineral Consultation Area for sand and gravel. It is considered unlikely that the allocation would impact upon the mineral resources in the area.</p>

<p>Strategic Policy 23 – Seaton and its future development Pg. 80</p>	<p>Transport</p>	<p>The town has most facilities so a small level of development here as proposed is supported. The proposed development is within cycling distance to the town centre so access to new and existing routes should be provided. Some of the rejected sites should be reconsidered as would be better for transport than a new community, allowing short-distance sustainable trips to local facilities and helping to boost the local economy.</p>
<p>Strategic Policy 24 – Sidmouth and its future development Pg. 82</p>	<p>Education</p>	<p>It is noted that the secondary school would require expansion in order to support the proposals in the Plan.</p>
<p>Strategic Policy 25 – Development at local centres Pg. 85-86</p>	<p>Transport</p>	<p>Small levels of development are supported here and rejected sites are outside standard cycling distances to town centre so would require good bus service if to come forward. However, these would still be preferable to a new community.</p>
<p>Strategic Policy 25 – Development at local centres Pg. 85-86</p>	<p>Education</p>	<p>Development at Broadclyst would lead to displacement of students who are currently travelling to access Broadclyst Primary School and is likely to impact on primary education provision in Exeter. Therefore, the Local Education Authority is concerned about the ability to support this level of development at Broadclyst due to this impact on primary school provision. We raise similar concerns about Clyst Vale Secondary School. For development proposed near to the new community (eg Woodbury), please note secondary and SEND provision will need to be supported and invested in the new town education infrastructure. In relation to this, please see previous comments regarding capacity at Exmouth Community College.</p>
<p>Strategic Policy 26 – Development at service villages Pg. 96-99</p>	<p>Education</p>	<p>Development in Service Villages will see an increase in cost to home to school transport for secondary education in particular. Please also see our previous comments with regards to capacity at King's school, Feniton, Payhembury, Tipton St John, West Hill. Many of the Service Villages do not have the suitable primary education infrastructure and are therefore not considered educationally sustainable. Some of the Service Villages do not have a primary school located within the village meaning they are not educationally sustainable due to home to school transport, for example Dunkeswell and Exton. It is recommended the LPA allocates a primary school site in Tipton following the recent announcement of the primary school being provisionally included within the Schools Rebuilding Programme.</p>
<p>Chapter 7 – Tackling the climate emergency and responding to climate change</p>		
<p>Strategic Policy 27 – Climate Emergency Pg. 131</p>	<p>Climate Change</p>	<p>This policy could be enhanced by incorporating the need to reduce emissions by 50% by 2030 from 2010 levels, and to add two further points to the policy: d) the principle of 20-minute neighbourhoods and e) the principle of One Planet Development.</p>

	Transport	One of the best ways to help the climate emergency is to reduce the need to travel. It is questionable if a new community helps with this given there are no facilities there from day one and everyone will need to travel to alternative settlements for all provisions.
Strategic Policy 28 – Net-zero Carbon Development Pg. 132	Climate Change	It is a good aspiration to ask for major development to calculate whole life cycle carbon emissions, but this should go further to expect developers to reduce embodied carbon emissions (we highlight Mid Devon’s current work on this). We see Strategic Policy 34 focusses on Embodied Carbon, so a cross reference here would be helpful.
	Public Health	The plan contains little reference to retrofitting existing housing stock to ensure it can reduce carbon impact. When extending existing properties, opportunity to retrofit carbon zero standards should be considered where possible, including houses of traditional construction (e.g. cob). This will help to ensure those in poorer housing stock, on lower incomes are not placed at further disadvantage.
Strategic Policy 29 – Promoting renewables and zero carbon energy Pg. 134	Economy	Reference should be made to the economic opportunities from the move towards Net Zero from the document: ‘A Clean Growth Vision for Development in the West of East Devon’.
	Climate Change	Paragraph 7.8 - This section could reference the Devon Carbon Plan that calculates that Devon will need at least eight times more renewable energy capacity than it currently has to meet net-zero. This then justifies the need for this policy, rather than just saying “This will play a crucial role in achieving climate objectives”. Policy 29 promotes community-led schemes, which is in accordance with the Devon Carbon Plan.
Strategic Policy 30 – Suitable areas for solar energy developments Pg. 135	Economy	Reference should be made to the economic opportunities from the move towards Net Zero from the document: ‘A Clean Growth Vision for Development in the West of East Devon’. There appears within the document to be a passive approach to domestic generation and energy saving in new builds (domestic and commercial), where there is the opportunity to make this standard. East Devon is an area with one of the best solar resources nationally. Use of Grade 1 to 3 farmland for energy generation, when an existing, or proposed building, or car park that isn’t intrusive in terms of landscape visibility, provides that same opportunity, is a poor use of resources, especially when there are global supply chain issues and inflationary pressures in both fuel and food, that are likely to continue into the future. DCC can provide maps of farmland grades

	Landscape	<p>if necessary. Lower energy costs for householders and businesses through energy production and saving boost the local circular economy, decreasing economic leakage from the local area and increasing both the discretionary spending power and financial viability of local residents and businesses and promoting economic wellbeing of the entire District.</p> <p>To reflect the NPPF, DCC recommends that the policy refers to the needs for the scale, siting and design of these developments to have regard to the intrinsic character and beauty of the countryside, be located in the least environmentally sensitive locations, and be well designed and integrated into the landscape, and take opportunities to improve and enhance landscape character and biodiversity. The supporting text could refer to the Devon Landscape Policy Group (DLPG) Advice Note 2 (2013), which provides guidance on many of these issues. We support an update of this guidance to ensure it is fit for purpose going forward.</p>
Strategic Policy 31 – Suitable areas for wind energy developments Pg. 136	Landscape	Suggest removing the statement ‘where landscape sensitivity has been identified as being low/moderate or moderate’ as this depends upon the size and number of turbines being proposed. It may be beneficial to refine suitable areas for these development types using a landscape sensitivity assessment approach. This could minimise risk of developers progressing sites in these areas and carrying out EIAs only to find the landscape and visual impacts, scale and design of such developments are ‘unacceptable’.
Strategic Policy 32 – Energy Storage Pg. 137	Economy	This policy is welcomed. Reference should be made to the economic opportunities from the move towards Net Zero from the document: ‘A Clean Growth Vision for Development in the West of East Devon’.
Strategic Policy 35 – Flooding Pg. 141	Flood Risk	<p>As the Lead Local Flood Authority, we are supportive of this policy.</p> <p>There appears to be reference to water quality underpinning plan policies its related to under 7.35 but it is unclear that this is then followed through with any other policies beyond strategic policy 86. Are more thorough policies expected on this upon completion of the water cycle study and will this be re-consulted on?</p> <p>The Council should consider water re-use doesn’t appear to play a role in either flood policy or climate change policy.</p>
Chapter 8 – Meeting housing needs for all		
Strategic Policy 39 - Housing to address needs	Public Health	The internal space of buildings should be of practical size to allow adaptability and include space to enable families to sit together to eat as this can be a factor leading to poor eating habits,

Pgs. 160	Children's Services	
Strategic Policy 49 - Rural Exception Sites and First Homes Exception Sites Pgs. 184-185	Travelling & Vulnerable Communities	Regarding the last paragraph in this policy, would this include planning applications from the Gypsy and Travelling community who might already be residing on a particular authorised site? If so, there is already a National Travellers Planning Policy to deal with that. In essence it would severely impact the ability to extend a family site, where size and condition allows when members of that family come of age (only in exceptional cases). It would require alternative sites to be found, which, as you might know have proven to be near impossible over the many years families have tried to find the right piece of land that ticks all the planning requirements in any event. In DCCs opinion, this would be severely limiting for families.
Strategic Policy 50 - Housing for rural workers Pgs. 188-189	Economy	<i>'Permission for a rural worker dwelling will be subject to an occupancy condition to ensure that it cannot be sold on or sublet for general accommodation unrelated to the enterprise. Removal of such a condition will only be permitted where there is clear evidence that there is no need for the condition to remain in place'</i> – does there also need to be a reasonable time clause for the review of a condition, or will this be counterproductive? This would be to prevent an owner saying they don't need it after just one year and trying to sell it on, or convert to holiday accommodation.
Supporting Statement Chapter 8	Economy	Other housing matters – we agree that the provision of accommodation such as Airbnbs is only an issue in a small number of coastal areas (Airbnb evidence is held by Devon County Council, which can be supplied in commercial confidence to EDDC). We expect that due to the strongly market dependent nature of such accommodation, that any significant over-supply will, to an extent, be shaped by market forces and demand. We suspect that when assessing recent economic conditions, tastes and preferences, that demand for holiday accommodation overall may have been close to its recent potential peak in the years 2020 to 2022
	Public Health	Other housing matters – The influence of second homes needs to be adequately addressed in relation to sustainability and affordable housing.
Chapter 9 – Supporting jobs and the economy and vibrant town centres		
Strategic Policy 55 – Employment and Skills Statements Pgs. 203-204	Economy	Reference should be made to the Skills Academy and the aeronautical engineering opportunities in the Western part of East Devon. Reference should also be made to the skills requirements and implications of moving towards Net Zero, including retrofit skills. Please also refer to A Clean Growth Vision for Development in the West of East Devon.

<p>Strategic Policy 57 – Town Centre development Pg. 209</p>	<p>Economy</p>	<p>We welcome this policy but wonder whether it could be strengthened to ensure there is no overall erosion of critical mass of activity within a town's retail core that ensure a vibrant town centre, i.e., one that prevents piecemeal change of use within a main retail area rather than being slightly more favourable to it on the edge of the main retail area. A policy that if change of use is justified it errs towards other uses that drive footfall in town centres such as employment uses, or services, or when there is a change of use to residential it is above shop units, or on the edge of retail cores rather than within the main retail core. This would need very careful wording.</p>
<p>Strategic Policy 60 – Sustainable Tourism Pgs. 215-216</p>	<p>Economy</p>	<p>We wondered how the loss of visitor accommodation policy would be applied to those premises, often marketed informally as accommodation via websites such as Airbnb, that have only recently begun to be used as visitor accommodation and previously formed part of the residential housing stock?</p>
<p>Chapter 10 - Designing beautiful and healthy spaces and buildings</p>		
<p>Strategic Policy 62 - Design and Local Distinctiveness Pgs. 222-223</p>	<p>Waste</p>	<p>The Waste Planning Authority supports and welcomes the inclusion of point 2. and the implementation of the waste hierarchy. It is recommended that this point is expanded to include the design phase. This would ensure that when the design and layout of development is being conceptualised the reduction of waste would be considered.</p>
<p>Strategic Policy 63 - Housing Density and Efficient Use of Land Pg. 224</p>	<p>Economy</p>	<p>Does efficient use of land also refer to proposals for renewable energy generation on farmland, where there could be an option to utilise currently unused space on buildings, or proposed unused space on planned buildings?</p>
<p>Chapter 11 - Prioritising Sustainable travel and providing the transport and communications facilities we need</p>		
<p>Strategic Policy 65 - Walking, cycling, and public transport Pg. 229</p>	<p>Climate Change</p>	<p>Policy 65 and 66 should be cross referenced with the net-zero policy section as this is fundamental to achieving net-zero. Promotion of 20-minute neighbourhood is aligned with the Devon Carbon Plan. This could be enhanced by describing the need for the easy interchange between active and shared transport modes by using mobility hubs.</p>
	<p>Transport</p>	<p>It is good the Plan supports sustainable travel but the idea of a new community does not limit the need to travel and offer a genuine choice of transport modes so this approach is questionable. The Plan focuses on sustainable travel in new developments but providing these in existing settlements is just as important. DCC is currently reviewing its policy on Park and Ride sites given the slow uptake of bus travel since the pandemic. However, the idea of park and change facilities</p>

	Public Health	on the edges of urban areas to allow sustainable modes to be used in town and city centres is supported. We would expect development to support active travel and reduce unnecessary travel, with specific reference to Paragraph 110 in the NPPF, with regards to addressing the needs of people with disabilities and reduced mobility
Strategic Policy 66 - Protecting transport sites and routes Pg. 230	Transport	It is good these routes are recognised and will be protected from other development.
Strategic Policy 67 - Travel Plans, Transport Statements, Transport Assessments Pg. 231	Transport	For proposed developments of a reasonable size and nature such supporting documents are standard requirements as part of any application package to allow public consultees and the LPA to ascertain the impacts on the local highway network and gain a firmer understanding of what mitigation (where deemed necessary) is required as part of the proposals. Travel Plans play a part in raising awareness and providing opportunity for parties to change their method of travel and ethos to more sustainable practices.
Strategic Policy 68 - Parking standards Pg. 232	Transport	Each development site should have its own parking standards. Rural locations will require additional parking spaces whereas in more urban areas where there are good sustainable alternatives, parking spaces could be reduced to lower the demand on the private car.
Chapter 12 - Caring for our outstanding landscape		
Strategic Policy 74 - Landscape Features Pgs. 239-240	Landscape	The Devon-wide Landscape Character Assessment (LCA) provides evidence that is intended to underpin these policies. DCC recommend the policy wording is amended to refer to “valued landscape attributes”, and “special features and qualities” which the LCA profiles provide evidence for. The supporting text can refer to the LCA evidence.
Strategic Policy 75 - Areas of Outstanding Natural Beauty Pg. 240	Landscape	The 3 rd bullet point in this policy (major development in the AONB), in order for it to reflect the NPPF, we suggest this refers to scope for mitigation and whether there is potential for significant effects.
Strategic Policy 76 - Coastal Preservation Areas Pgs. 241-242	Landscape	Paragraph 12.7 - we are not familiar with the detailed character assessment of undeveloped coast referred to in this paragraph, but its title suggests consideration of openness and views to and from the sea only, whereby landscape character is broader.

Chapter 13 - Protecting and enhancing our outstanding biodiversity and geodiversity		
Strategic Policy 86 - Habitats Regulations Assessment Pgs. 257-259	Flood Risk	DCC as the Lead Local Flood Authority would like to discuss this policy with EDDC to ensure that both councils (EDDC and DCC) are aware of the input that DCC's Flood and Coastal Risk Management Team can provide on planning applications within the River Axe SAC catchment. Will applicants be likely to engage with EDDC (or DCC) before submitting a planning application within this catchment?
Chapter 14 - Open space and sports and recreation facilities		
Chapter 15 - Our outstanding historic environment		
Strategic Policy 105 - Archaeology and Scheduled Monuments Pgs. 293-294	Historic Environment	<p>The Historic Environment Team would advise that the following elements of Policy 105 are slightly amended.</p> <p>Policy 105 part 1: reword for clarity and remove "...or nationally important..." so the section reads: <i>"Development must protect the site and setting of Scheduled Monuments, designated or undesignated archaeological remains, including ancient routeways and milestones."</i></p> <p>Policy 105 part 7: reword for clarity and add "... ,non-designated, ..." so the section reads: <i>"For other, non-designated, archaeological remains, the effect of a development proposal on the significance of the remains, either directly or indirectly, will be taken into account in determining the application."</i></p> <p>Policy 105 part 8: for clarity reword the penultimate sentence: <i>"Planning permission may be granted conditional upon a programme of archaeological mitigation agreed with the Council that will be implemented by an appropriately qualified organisation. Unless otherwise agreed with the Council any development should not commence until the approved archaeological works have been satisfactorily completed."</i></p> <p>Policy 105 part 8: reword the final sentence and include a reference to making the results of any post-excavation work publicly available (as per para 205 of the NPPF): <i>"The results of the analysis of findings subsequent to the investigation should be published and made available to the relevant local and county authorities as well as being made publicly accessible."</i></p>

Supporting Statement Chapter 15	Historic Environment	<p>The Devon County Historic Environment Team welcomes the inclusion of heritage as one of the core strands of the Local Plan preparation, in particular its inclusion in the Strategic Policies for Green Infrastructure and the Clyst Valley Regional Park, Suitable Areas for Wind Energy Developments, Market Housing Mix, Sustainable Tourism, Wireless Connectivity and Telecoms Infrastructures and Areas of Strategic Visual Importance.</p> <p>Para 15.4 - Some non-designated heritage assets may be of equal significance as a designated heritage asset and should be considered subject to the policies for designated heritage assets. In addition, some non-designated heritage assets may have regional significance rather than local significance.</p>
Chapter 16 - Ensuring we have community buildings and facilities		
Chapter 17 - Implementation and monitoring of the local plan		
Supporting Statement Chapter 17	<p>Infrastructure</p> <p>Education</p>	<p>We note that paragraph 17.3 states that detailed assessment of infrastructure needs will be undertaken as the local plan making progresses, and we wish to be involved in this work. The County considers it essential that infrastructure necessary to support the development proposed in the East Devon Plan is provided in an appropriately phased and timely manner. It is also essential that appropriate funding mechanisms to deliver this infrastructure are in place, in particular to ensure necessary education, transport and community infrastructure is provided.</p> <p>DCC needs assurance that education contributions will be supported for all dwellings with 2 or more bedrooms (family-type) and requests that planning contributions towards education provision are secured via s106 agreements and not CIL, in accordance with Devon County Council's Education Approach for Developer Contributions (current version December 2021).</p>
Chapter 18 - Have we missed anything?		
Chapter 19 - Glossary of terms		
Site Allocations		
Western side of East Devon	Flood Risk	The proposed new town site allocations include a number of watercourses mapped and unmapped which need to be considered. Further detailed investigations will be required to ensure a viable whole site drainage strategy can be delivered here.
Axminster	Flood Risk	Axmi_02, 06, 07, 09, 11a and ED/75, ED/80a, ED/82, ED/83 are all sites where there are at least informal anecdotal reports that they have been impacted by surface water/ordinary watercourse

		<p>flooding. Many of these sites are also immediately upstream of properties who have experienced internal flooding from surface water and/or ordinary watercourses in 2021.</p> <p>These proposed development allocations will require a thorough drainage strategy and ideally should be looking to improve on the existing situation to help reduce the flood risk to Axminster.</p> <p>LP_GH/ED/80a, LP_GH/ED/80b, LP_GH/ED/75 are all proposed sites that fall within Axminster Critical Drainage Area.</p> <p>All new development will have to play their part in reducing current rainfall runoff rates. This requirement also applies to brown field sites that will have to match the same standards. The SuDS hierarchy should be followed, by using infiltration as far as is practicable.</p> <p>Further guidance on such systems can be found in the CIRIA SUDS manual and in LLFA guidance. All off-site surface water discharges from development should mimic “Greenfield” performance up to a maximum 1 in 10 year discharge rate. On-site all surface water should be safely managed up to the “1 in 100+climate change” conditions. This will require additional water storage areas to be created thereby contributing to a reduction in flooding downstream. Developers within Critical Drainage Areas will need to familiarise themselves with this at: https://www.devon.gov.uk/floodriskmanagement/planning-and-development/</p> <p>Will LP_GH/ED/83 need to drain into the existing Vistry/Linden Homes site? If so, has this been accounted for within the Vistry/Linden drainage system?</p>
Broadclyst	Flood Risk	<p>It is noted that LP_BRCL_09 has been previously considered by the LLFA and is currently proposed to be allocated under the Neighbourhood Plan.</p> <p>LP_BRCL_12: we would ask for clarification on the function and approach to the existing ‘pond’ which it is unclear if this forms part of the allocation. Historic mapping suggests this has been in place for over 100 years. Would EDDC prefer SuDS to be included within green infrastructure at this site? Perhaps the drainage features could be multifunctional. Would EDDC want permanent water levels or a wetland area?</p>

		LP_BRCL_29: no comments to make at this stage.
Broadhembury	Flood Risk	LP_Brho_09: the site design should consider any opportunities to enhance the existing watercourse running along the north/north-east boundary abutting the Primary School and the ordinary watercourse that appears to cross the access to the site.
Budleigh Salterton	Flood Risk	LP_Budl_01: no comments to make at this stage – does EDDC want some green infrastructure included here? The development may require a sewer requisition to the watercourse if infiltration is unfeasible (there seems to be a combined sewer within Knowle Road, but South West Water will need to provide comments on this). LP_Budl_02 and LP_Budl_03: no comments to make at this stage LP_Budl_04 and LP_Budl_05: Sites are proposed to be refused we, therefore, have no comments to be made at this stage. LP_Budl_06: no comments to make at this stage LP_Budl_07, LP_Budl_08 and LP_Budl_09: mapping is unclear where these are located.
Colyton	Flood Risk	LP_Coly_02a: no comments to make at this stage LP_Coly_02b: The existing field access and small sections of the crossroads is associated with some ponding. Historically it appears that a pond used to exist in this location, this should be considered and managed accordingly.
Exmouth	Flood Risk	LP_Lymp_14 and LP_Exmo_14: an ordinary watercourse is understood to flow through these sites with sections possibly culverted. Opportunities to enhance or where appropriate, daylight any sections should be sought. Any culvert should be surveyed to clarify its precise route at an early stage as this could impact upon the deliverability of any allocation particularly within LP_Exmo_14. LP_Exmo_17: Multiple ordinary watercourses are understood to run through this site North to South joining the Littleham Brook, these should be considered as part of any proposal in this location. There may be opportunities for utilising natural flood management to reduce the existing flood risks downstream from these and the Littleham Brook itself. LP_Exmo_06: This has come forward via an existing planning application in which the LLFA has provided comment recently. We therefore, at this stage through the local plan process have no further comments to make. LP_Lymp_09 and LP_Lymp_10a: the drainage of these site may need to be carefully considered if infiltration is not viable. There do not appear to be any watercourses or sewers within the vicinity of these sites. The LLFA have no further comments to make at this stage on the other allocations.

Exton	Flood Risk	LP_Wood_28: there is a long history of flooding on the adjacent Exmouth Rd and downstream Station Rd, as well as along Mill Lane and the southern boundary of the site. A robust drainage strategy that seeks improvements on the existing arrangement should be considered. We would encourage the developer to engage early with DCC should this site progress.
Feniton	Flood Risk	<p>All suggested allocations appear to fall within the <u>Feniton</u> Critical Drainage Area, as defined by the Environment Agency, which means that this catchment needs to be protected from development pressures.</p> <p>All new development will have to play their part in reducing current rainfall runoff rates. This requirement also applies to brown field sites that will have to match the same standards. The SuDS hierarchy should be followed, by using infiltration as far as is practicable. Further guidance on such systems can be found in the CIRIA SUDS manual and in LLFA guidance. All off-site surface water discharges from development should mimic “Greenfield” performance up to a maximum 1 in 10 year discharge rate. On-site all surface water should be safely managed up to the “1 in 100+climate change” conditions. This will require additional water storage areas to be created thereby contributing to a reduction in flooding downstream. Developers within Critical Drainage Areas will need to familiarise themselves with this at: https://www.devon.gov.uk/floodriskmanagement/planning-and-development/</p> <p>Proposed sites including LP_Feni_07, LP_Feni_09 and LP_Feni_11 appear to have significant flowpaths running through them or adjacent to the sites which cause flooding to property in Feniton during low return periods. There are flood schemes within Feniton already to try to reduce these risks but upslope/upstream measures in these allocations may help to reduce the risks further. These allocations should look to consider opportunities to reduce peak runoff on these flowpaths to provide flood risk reduction benefits to Feniton itself and to potential access routes that would likely be required for these sites.</p>
	Minerals	<p>The Mineral Planning Authority welcomes the rejection of sites LP_West_05; LP_West_12; LP_West_13; and LP_West_14 in West Hill and sites LP_Feni_03 and LP_Feni_04 in Fention. The Mineral Planning Authority had previously stated that these sites are located within or close to a Mineral Safeguarding Area or Mineral Consultation Area for aggregates and as such objected to the inclusion of this site on the basis that development would sterilise minerals and has the</p>

		potential to constrain future working within other parts of the Mineral Safeguarding Area, supported by Policy M2 of the Devon Minerals Plan. A Mineral Resource Assessment would be required by EDDC to establish the potential economic value of the sand and gravel resource if it wishes to pursue allocation of this site.
Honiton	Flood Risk	<p>LP_Gitti_05: There are a number of ordinary watercourses within this allocation which are known to have required significant works downstream to manage associated erosion. EDDC might want to request that this allocation restricts to greenfield runoff rates, however, this is above what the NPPF asks for and DCC have no data on this watercourse to suggest whether this would be worthwhile.</p> <p>LP_GH/ED/39a: The proposed allocation is understood to have a culverted watercourse which is potentially not accurately considered within the existing flood mapping. Opportunities to enhance the existing watercourse should be sought which may include daylighting the culvert itself. If works are proposed in or near to the existing watercourse then the developer may wish to seek early engagement with the Environment Agency over any requirements that they may have.</p> <p>LP_Honi_07 and LP_Honi_13: these allocations are within a steep area of Honiton, so infiltration might not be appropriate. These sites would likely need to drain to a surface water sewer via a sewer requisition as there do not appear to be any watercourses within the vicinity.</p> <p>No further comments at this stage on the other proposed allocations.</p>
Kilmington	Flood Risk	LP_Kilm_09 and LP_Kilm_10: these sites have clear mapped surface water flooding and there are properties locally known to have flooded from surface water issues. It is understood that the site has unmapped ordinary watercourse(s) which should be considered as part of any design and enhanced where appropriate.
	Waste	The site falls within the Waste Consultation Zone for the Gammons Hill Waste Transfer site, and as such Policy W10: Protection of Waste Management Capacity, of the Devon Waste Plan is relevant. This policy seeks to ensure that waste management capacity is not constrained by the citing of incompatible development in close proximity. The site is in very close proximity to the waste transfer site and therefore any application for residential development should will need to meet the requirements of Policy W10 of the Devon Waste Plan.
Lympstone	Flood Risk	LP_GH_ED/72 and 73: A culverted unmapped ordinary watercourse appears to cross centrally through both of these sites. Opportunities to daylight and enhance this watercourse should be sought.

Sidbury	Flood Risk	<p>LP_Sidm_34: The proposed site has multiple ordinary watercourses running through it. Any proposed development should look to improve these watercourses and avoid any culverting. Were these proposed to be a point of discharge for surface water then CCTV surveys may need to be sought during or ideally prior to the planning process (were it to proceed) to prove that they can be utilised.</p>
Sidmouth	Flood Risk	<p>LP_Sidm_01: There have been longstanding issues with ordinary watercourse and surface water flooding in the Woolbrook catchment primarily of the highway. This allocation has previously been identified as a location for flood storage and early engagement has been had between the LLFA and the developer's drainage consultant. The site is an opportunity to lower flood risk to the catchment and we hope to continue discussions to seek improvements on the existing arrangement.</p> <p>There are a number of surface water flowpaths, ordinary watercourses and flood zone areas impacting upon the allocations to the north of Sidmouth/Sidford. Opportunities to enhance existing watercourses and daylight any culverted sections where appropriate should be sought.</p>
West Hill	Flood Risk	<p>LP_West_01: nearby land and property has been associated with surface water flooding. A robust drainage strategy should be considered. It is unclear currently to the LLFA whether there is a feasible positive discharge point for this allocation.</p> <p>LP_West_04 – The LLFA has, since the consultation was made live, been provided a report by RMA Environmental (November 2022) on behalf of nearby residents affected by surface water flooding from this site. It is understood this has been submitted as a formal comment on the local plan.</p> <p>In a separate matter the LLFA has met on site with the landowner to discuss concerns of residents over surface water runoff to the east. The site currently has a series of large deep cutoff drains which due to poor infiltration hold water for extended periods, these do not currently positively drain anywhere. It is understood the developer put these in place in response to surface water runoff issues to the east. Their effectiveness is unclear. If this site is to be progressed a robust drainage strategy will be required and this should factor in these current issues.</p> <p>LP_West_06: No comments to make at this stage.</p> <p>LP_West_04 & LP_West_06: seem to be very steep, so infiltration will need to be considered very carefully. The only alternative for drainage appears to be sewer requisitions between existing houses into surface water sewers.</p>

	Minerals	<p>The Mineral Planning Authority welcomes the rejection of sites LP_West_05; LP_West_12; LP_West_13; and LP_West_14 in West Hill and sites LP_Feni_03 and LP_Feni_04 in Feniton. The Mineral Planning Authority had previously stated that these sites are located within or close to a Mineral Safeguarding Area or Mineral Consultation Area for aggregates and as such objected to the inclusion of this site on the basis that development would sterilise minerals and has the potential to constrain future working within other parts of the Mineral Safeguarding Area, supported by Policy M2 of the Devon Minerals Plan. A Mineral Resource Assessment would be required by EDDC to establish the potential economic value of the sand and gravel resource if it wishes to pursue allocation of this site.</p>
Whimble	Flood Risk	<p>LP_Whim_03, 07, 11, 13, 19 fall within the <u>Whimble</u> Critical Drainage Area, as defined by the Environment Agency, which means that this <u>catchment</u> needs to be protected from development pressures.</p> <p>All new development will have to play their part in reducing current rainfall runoff rates. This requirement also applies to brown field sites that will have to match the same standards. The SuDS hierarchy should be followed, by using infiltration as far as is practicable. Further guidance on such systems can be found in the CIRIA SUDS manual and in LLFA guidance.</p> <p>All off-site surface water discharges from development should mimic “Greenfield” performance up to a maximum 1 in 10 year discharge rate. On-site all surface water should be safely managed up to the “1 in 100+climate change” conditions. This will require additional water storage areas to be created thereby contributing to a reduction in flooding downstream. Developers within Critical Drainage Areas will need to familiarise themselves with this at: https://www.devon.gov.uk/floodriskmanagement/planning-and-development/</p> <p>LP_Whim_08: The site has a number of watercourses and the applicant should consider opportunities to daylight any significant sections of culverted watercourse which may cross the site with the potential to open this up as a green corridor. This will need to be carefully considered within the design.</p>
Woodbury	Flood Risk	<p>LP_Wood_10: It is understood that there is a mapped flood risk asset within the allocation that needs to be considered.</p> <p>LP_Wood_16: There are known surface water flow routes that abut all of the site boundaries, consideration of overland flows and ensuring these are managed and not worsened elsewhere will need to be considered within a robust drainage strategy.</p>

		There is an ordinary watercourse that appears to potentially impact upon both LP_Wood_20 and LP_Wood_23 opportunities to enhance this section of watercourse should be sought. Were this watercourse to be a point of discharge for surface water then CCTV surveys may need to be sought during or ideally prior to the planning process (were it to proceed) to prove that they can be utilised and there is no issue with the downstream culvert.
Additional Comments		
Evidence Base	Landscape	The Devon-wide landscape character assessments should be referred to as part of the evidence base for the local plan. To note that DCC's landscape officer has provided guidance to EDDC on the methodology used for the Landscape Sensitivity Assessment of the New Community, to ensure a consistent approach with LSAs being undertaken in other parts of the County, in particular Exeter City.
The Role and Function of Settlements	Transport	This suggests that Smallridge (and All Saints) does not have an hourly bus service. However, there is an hourly bus service which is within a reasonable walking distance so DCC would like this recognised in the table.

Appendix 2: additional overarching Flood Risk allocation comments

It is understood that EDDC are currently undertaking a Strategic Flood Risk Assessment (SFRA) in which the risk of flooding from all sources including the impact of new development and climate change will be considered and used to inform the Local Plan. We have therefore, chosen not to comment at this stage on the existing risks beyond standard wording in the table below, as these will be considered through the SFRA. Existing risk mapping (including surface water flood risk mapping) is available to view on national mapping and also locally on DCC’s Environment Viewer - <https://www.devon.gov.uk/environment/environmental-maps>.

A precautionary approach to Flood Zone 3 is proposed because mapping of Flood Zone 3a is not currently available.

Scenario	Proposed standard text
Site / part of site is in Flood Zone 3 and is previously developed	The site / X ha of the site is in flood zone 3, assumed to be flood zone 3b under the HELAA's precautionary approach. However, the area is previously developed and so is not discounted from having redevelopment potential on flood risk grounds. The area may be suitable for redevelopment if the sequential and exceptions tests are passed, as set out in PPG.
Site / part of the site is in flood zone 3 and is not previously developed	The site / x ha of the site is in flood zone 3, assumed to be flood zone 3b under the HELAA's precautionary approach. It is therefore discounted from having development potential.
Site / part of the site is in flood zone 2	The site / x ha area of the site is in flood zone 2. Land in flood zone 2 has a medium probability of experiencing fluvial flooding and only has development/redevelopment (select as appropriate) potential if the sequential and exceptions tests set out in PPG are adhered to. Any planning application must include a flood risk assessment.
Entire site is in flood zone 1	The site is entirely within flood zone 1 and so has a low probability of experiencing fluvial flooding. Any planning application for development must include a flood risk assessment.
Site includes land in the surface water flooding zones for 1/100 years or 1/30 years	The site includes land at risk from surface water flooding. Development must be informed by a drainage strategy to deal with existing surface water flows through the site and any potential increase in surface water runoff. Sustainable Drainage Systems should be used where possible and Sustainable Drainage Systems Guidance for Devon should be followed.
Site does not include land in a surface water flooding zone	Whilst the site is not known to be at risk from surface water flooding, development must include a drainage strategy to deal with existing surface water flows within the site and any potential increase in surface water runoff. Sustainable Drainage Systems should be used where possible and Sustainable Drainage Systems Guidance for Devon should be followed.

Proposed sites will need to meet the requirements as laid out in our local SuDS Guidance, the joint position statement on SuDS in Flood Zones should also be considered as this could impact significantly on the design of some sites - <https://www.devon.gov.uk/floodriskmanagement/planning-and-development/sustainable-drainage/> . DCC also have a ground water monitoring policy where infiltration devices are being proposed see <https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/>

Any allocations coming forward should ensure they use the updated Climate Change Allowances - <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

If an ordinary watercourse runs through a site (this can include ephemeral ditches), any temporary or permanent works need to take place within this watercourse to facilitate the proposed development (such as an access culvert or bridge), Land Drainage Consent must be obtained from Devon County Council's Flood and Coastal Risk Management Team prior to any works commencing. Details of this procedure can be found at: <https://new.devon.gov.uk/floodriskmanagement/land-drainage-consent/>. It should be noted that local LLFA policy and the updated Planning Practice Guidance Chapter for Flood Risk and Coastal Change discourage culverting of watercourses and building over culverts.

Proposed sites may benefit from early engagement using DCC Flood Risk Management Team's pre application advice service - <https://www.devon.gov.uk/floodriskmanagement/planning-and-development/pre-application-advice/>

EDDC may wish to assess allocated sites from an ecological perspective to inform the types of SuDS features which might be more appropriate to the local area. For example, it might be more appropriate for some sites to have wetland habitats than others. Treatment potential of these features may also need to be considered. However, a good SuDS Management Train should treat surface water.

Appendix 3

**East Devon Local Plan
Transport Site Infrastructure Assessments**

Contents

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Introduction

This note has been produced to support Devon County Council's response to East Devon's Local Plan. It gives a summary of each of the towns and a list of the facilities currently available in each settlement. It then gives a high level summary of each model of transport within the town before considering how each of the potential sites could be accessed and the impact this may have on the local transport network.

The development maps include distance contours to give an indication of how far the town centre and other major facilities are from proposed development sites. These are set at 800m and 2.5km which are the nationally accepted distances people are likely to walk and cycle respectively to reach local facilities and transport connections.

Axminster

EDDC Option Sites

- 800m rail walking catchment
- 2.5km rail cycling catchment
- Rail station
- 800m town centre walking catchment
- 2.5km town centre cycling catchment
- Town centre

East Devon Local Plan 2020-2040 - Axminster

Legend

Housing and Mixed Use Allocations

Preference

- Preferred
- Second choice
- Rejected

Employment Allocations

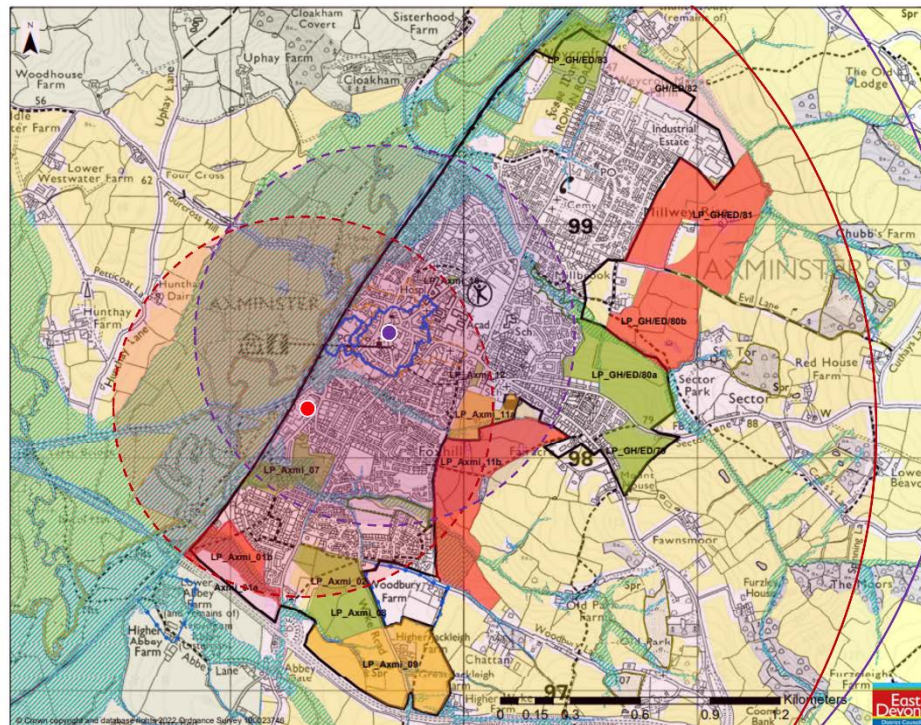
- Employment Allocations

Settlement Boundaries

- Settlement Boundaries

Other Land Use Categories

- Areas considered suitable for solar energy
- Town Centre Areas
- Land of Local Amenity Importance
- Floodzone 2 - 0.1%
- Floodzone 3 - 1%
- AONBs
- Conservation Areas
- Scheduled Ancient Monument
- Sites of Special Scientific Interest
- Special Areas of Conservation
- County Wildlife Sites



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

EDDC suggested option proposal (Consultation Winter 22/23)	1,050 dwellings 7.2 Ha of employment
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Background (from EDDC Role and Function of Settlements Report)

- Tier 2 settlement
- Axminster is the fifth largest town in East Devon in terms of population, with a population of around 6,800 people (in 2019)
- 2,796 residents are 'economically active', employment density 1.03 (2,870 local jobs and importer of 74 workers)
- 4 employment sites – Axminster Carpets, Millwey Rise Business Park, Coal Yard, Hunthay Farm
- Two thirds of working population work in East Devon, with 44% remaining in Axminster for work, showing the settlement is relatively self-contained. 11% travel across the border to West Dorset to work, 10% to South Somerset and 7% to Exeter.
- For jobs within the town, 47% of people walk or cycle to work and 46% by car.

Access to services (from EDDC Role and Function of Settlements Report)

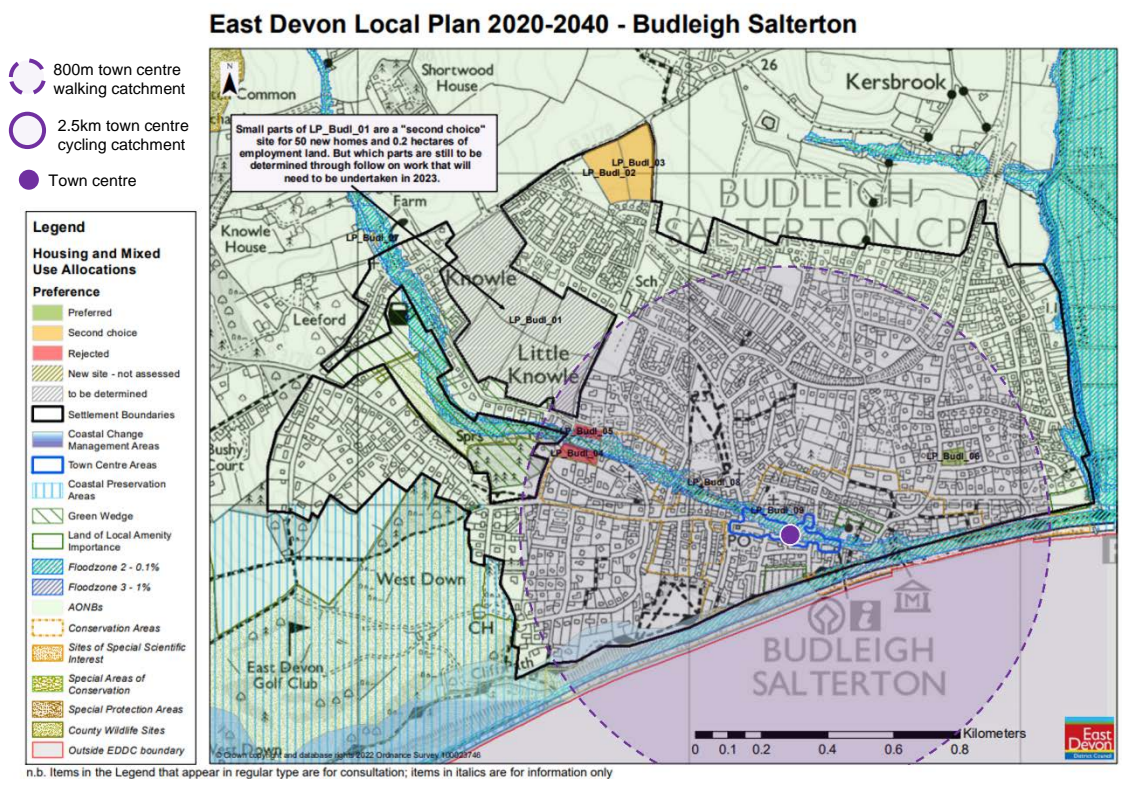
Strategic facilities and services		Local Facilities and services	
Train station	Y	Less than hourly bus service	Y
Hourly bus service	Y	Primary school	2

Secondary school	Y	Convenience shop	94
Supermarket	Y	Post office	Y
Hospital	Y	GP Surgery	1
Leisure centre	Y	Community hall	Y
Swimming pool	Y	Library	Y
Emergency service facility	Y	Pub	Y
		Allotments	Y
		Sports playing pitch	Y
		Children's play area	Y
Of all the settlements in East Devon, Axminster is one of only three that has all of the community services and facilities above (alongside Exmouth and Honiton)			
Transport			
Facilities within walking and cycling distance	Axminster's longest extent stretches from south-east to north-west at a distance around 2.7km, however the town centre and the rail station (slightly further south) are located fairly centrally within the town. This means that current residents are located within acceptable walking and cycling catchments. The rail station is approx. 600m south of the town centre, and within 1.5km of all proposed development sites.		
Public transport network / services (rail and bus)	<p>Rail: Station on the London Waterloo mainline on the edge of the town (40 mins to Exeter, 3 hours mins to Waterloo). This station has seen an 81% increase in usage 2000-2019.</p> <p>Bus: Axminster is served by a variety of bus services including the 44a to Exeter, the 30 to Taunton, the X51 and X53 providing services east along the coast and the 885 travelling south-west to Seaton.</p>		
Congestion hotspots / highway capacity issues	Peak time congestion through town centre. Congestion hotspots are around the George's hotel gyratory and the Stoney Lane/Lyme Road junction.		
Access to option sites (including HELAA Highways Comments)	<p>Axmi_1a/b: Access via Musbury Rd. Close to the rail station (approx. 800m) and 1.25km to the centre of Axminster.</p> <p>Axmi_02: Accessed via Musbury Road or potentially Wyke Road. Close to rail links (station approx. 800m) and just over 1km into the town centre.</p> <p>Axmi_07: Site is accessed via Woodmead Road, Gamberlake and Musbury Road. Improvements to pedestrian and cycle links would be needed. 800m to the town centre and adjacent to the rail station (400m)</p> <p>Axmi_08: Access available from Wyke Rd. Improved ped/cycle links needed. 1km to the rail station and 1.3km into Axminster town centre.</p> <p>Axmi_09: Access available from Wyke Rd only. No access available from A35. Ped/cycle links needed. 1.6km into the town centre area, 1.4km to the rail station.</p> <p>Axmi_10: Access available from A358 Chard Rd, good ped/cycle links already. Central location, 300m from the town centre, 900m from the rail station.</p>		

	<p>Axmi_11a/b: Access via Lyme Close. Potential for improvements to poor cycle links along Lyme Road. 500m from the town centre and approx. 1km to the train station.</p> <p>Axmi_12: Existing access from Lyme Rd is private and would require upgrading. Fairly central location, 400m from Axminster town centre, and approx. 1km to the train station.</p> <p>GH/ED/79: Potential access from Sector Lane or Lyme Road (B3261). 1km distance to the town centre and approx. 1.6km to the train station.</p> <p>GH/ED/80a/b: Potential access from Sector Lane (a) or Beavor Lane (b). 1km distance to the town centre and approx. 1.6km to the train station.</p> <p>GH/ED/81: Possible access from Beavor Lane or Weycroft Avenue (industrial estate). Site on the north-eastern edge of the town, 1.3km to the town centre and 1.8km from the train station.</p> <p>GH/ED/82: Possible access from Chard Road or Weycroft Avenue (industrial estate). North-eastern edge of the town, 1.5km to Axminster town centre and 2km to the train station.</p> <p>GH/ED/83: Possible access from Chard Road. North-eastern edge of the town, 1.5km to Axminster town centre and 2km to the train station.</p>
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Budleigh Salterton

EDDC Option Sites



EDDC suggested option proposal (Consultation Winter 22/23)	152 dwellings 0.5 Ha of employment
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Background (from EDDC Role and Function of Settlements Report)

- Tier 3 settlement
- Budleigh Salterton is the 7th largest town in East Devon with a population of around 5,375 (in 2019)
- 1,890 residents are 'economically active', employment density 0.7 (1,326 local jobs and exporter of 564 workers)
- Employment site at Salterton Workshops

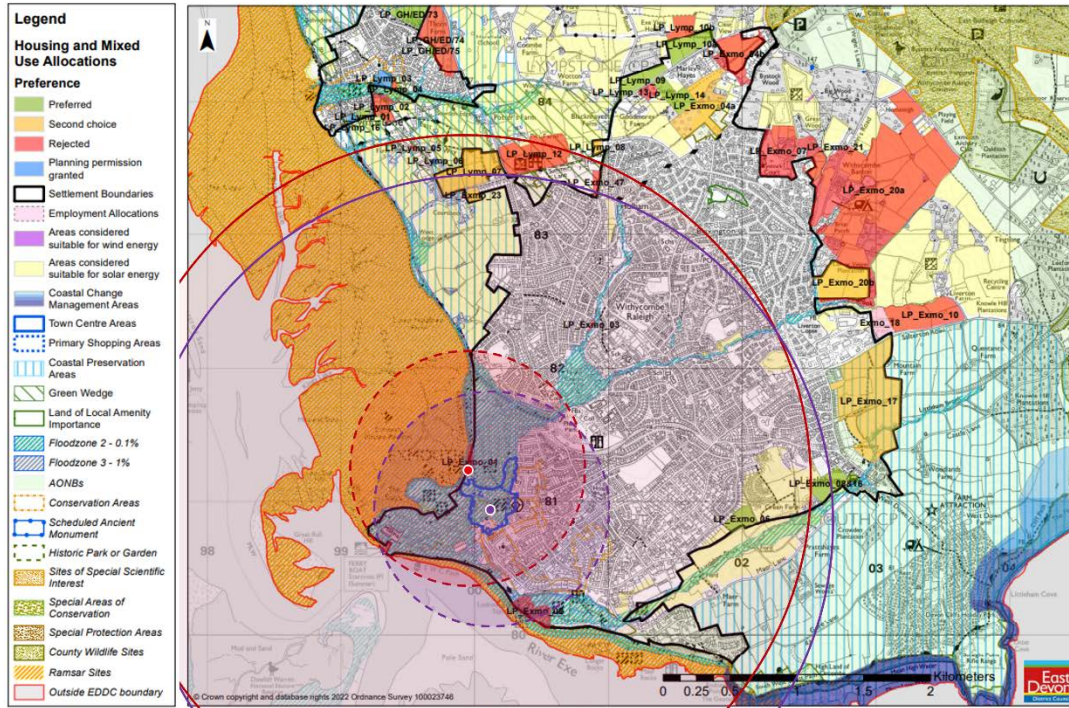
Access to services (from EDDC Role and Function of Settlements Report)

Strategic facilities and services		Local Facilities and services	
Train station	N	Less than hourly bus service	Y
Hourly bus service	Y	Primary school	1
Secondary school	N	Convenience shop	Y
Supermarket	N	Post office	Y
Hospital	Y	GP Surgery	1
Leisure centre	N	Community hall	Y
Swimming pool	N	Library	Y

Emergency service facility	Y	Pub	Y
		Allotments	Y
		Sports playing pitch	Y
		Children's play area	Y
Budleigh Salterton has many of the facilities above, with the exceptions being a train station, secondary school, supermarket, and leisure centre/swimming pool. The nearest train station to Budleigh Salterton is in Exmouth.			
Transport			
Facilities within walking and cycling distance	Reasonable walking distances are largely accepted as 2-2.5km (20-30 minutes). Nearly all of Budleigh Salterton falls within a 1.5km radius of the town centre. This means that facilities fall within active travel distances for most residents.		
Public transport network / services (rail and bus)	Bus: Budleigh Salterton is served by three bus routes. The 356 route travels between Budleigh Salterton and Exeter, and the 357 between Budleigh and Exmouth. The 157 bus route travels between Exmouth and Sidmouth via Budleigh Salterton. In combination, a frequency of roughly two buses an hour, travelling in each direction, is achieved.		
Congestion hotspots / highway capacity issues	No major congestion hotspots or capacity issues observed but traffic levels are higher in the summer because of tourists.		
Access to option sites (including HELAA Highways Comments)	<p>Budl_01: Access from B3178/Bedlands Lane/Knowle Rd/Barn Lane. Site is located approximately 1km from the town centre</p> <p>Budl_02: No issues with access, again located roughly 1km from the town centre area.</p> <p>Budl_03: Access from B3178 or via Budl_2 (ideally not Barn Lane), site is situated around 1km from Budleigh Salterton centre.</p> <p>Budl_04: Note Halse Hill very narrow, so only for small development. Situated approx. 700m from town centre.</p> <p>Budl_05: Access from Little Knowle Lane possible but only for small development. Situated approx. 700m from town centre.</p> <p>Budl_06: Access available from East Budleigh Rd, Boucher Rd may be too narrow. Approx 650m from the town centre.</p> <p>Budl_07: Access may be possible via Dalditch Lane, located around 1.4km from the centre of the town.</p> <p>Budl_08: Access to be confirmed, appears to be possible. Central location 200m from town centre.</p> <p>Budl_09: Access via Brook Rd may be possible, centrally located adjacent to the town centre area.</p>		

EDDC Option Sites

East Devon Local Plan 2020-2040 - Exmouth



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

- 800m rail walking catchment
- 2.5km rail cycling catchment
- Rail station
- 800m town centre walking catchment
- 2.5km town centre cycling catchment
- Town centre

EDDC suggested option proposal
(Consultation Winter 22/23)

1,033 dwellings
6.6 Ha of employment

Background (from EDDC Role and Function of Settlements Report)

- Tier 1 settlement
- Exmouth has by far the largest population in East Devon, with a population of 35,727 (in 2019)
- 16,768 residents are ‘economically active’, employment density 0.61 (10,261 local jobs, exporter of 6,507 workers)
- 9 employment sites – Liverton Business Park (phases 1, 2 and 3), Pankhurst Industrial Estate, Victoria Way, Pound Lane Industrial Estate, Dinan Way, Dinan Way Trading Estate, Goodmores Farm
- 62% of workers work in East Devon. 30% out-commute to Exeter to work – the highest level of out commuting in East Devon.
- For jobs within the town, 48% of people travel to work by car, with 38% either walking or cycling to work. Of those travelling to Exeter, a large proportion travel by car (71%), with 11% travelling by train and 6% by bus.

Access to services (from EDDC Role and Function of Settlements Report)

Strategic facilities and services

Local Facilities and services

Train station	Y	Less than hourly bus service	Y
Hourly bus service	Y	Primary school	8
Secondary school	Y	Convenience shop	278
Supermarket	Y	Post office	Y
Hospital	Y	GP Surgery	5
Leisure centre	Y	Community hall	Y
Swimming pool	Y	Library	Y
Emergency service facility	Y	Pub	Y
		Allotments	Y
		Sports playing pitch	Y
		Children's play area	Y

Of all the settlements in East Devon, Exmouth is one of only three that has all of the community services and facilities above (alongside Axminster and Honiton)

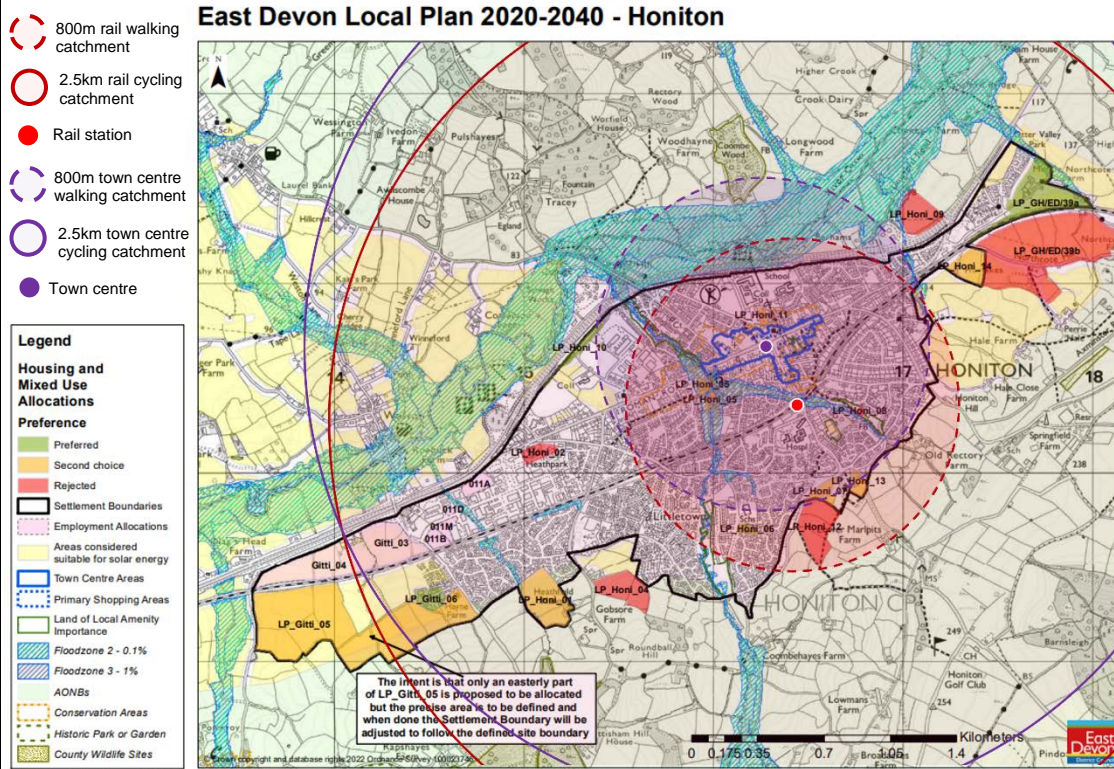
Transport

Facilities within walking and cycling distance	<p>The train station and town centre in Exmouth lie to the south west of the town, meaning some areas (largely of housing) on the north eastern edge of the town fall outside this catchment area. However, a large part of the town does fall within this radius, and the town has some secondary centre areas including a retail area in the east.</p> <p>Most facilities fall within active travel distances for most residents, and for jobs within the town 38% of residents walk or cycle to work.</p>
Public transport network / services (rail and bus)	<p>Rail: Station on edge of town centre, the terminus of the Avocet Line. Trains to Exeter run approximately every half hour, with a journey time to Exeter of around 30 minutes. The station has seen a 55% increase in usage 2000-2019. Rail makes up 4% of the towns travel to work modal split, rising to 11% for those commuting to Exeter.</p> <p>Bus: Exmouth is served by 6 main bus services (routes 57, 58, 95, 96, 157, 357) serving a fairly comprehensive network of routes across the town, however only 5% of residents currently use the bus to travel to work (6% of those commuting to Exeter). Journey times for the Exmouth-Exeter Route 57 bus would be improved by the proposed Dinan Way extension which is awaiting the outcome of a funding bid.</p>
Congestion hotspots / highway capacity issues	<p>Some peak time congestion throughout the town and along the A376 to/from Exeter, however no major hotspots or severe delays.</p>
Access to option sites (HELAA Highways Comments)	<p>Exmo_02: Land potentially acquired by EDDC for development (800m to rail station)</p> <p>Exmo_03: Land accessible from public highway (1.4km to station)</p> <p>Exmo_04a/b: Accessible from Halham Rd & Higher Marley Rd, on north-eastern edge of town so approx. 3.2km to station.</p> <p>Exmo_06: Not accessible from the public highway (2km from station)</p> <p>Exmo_07: Not accessible from the public highway (on north eastern edge of town so approx. 3.2km to station)</p> <p>Exmo_08/16: 08 not accessible from the public highway, 16 accessible from Elm Lane, approx. 2.5km from station</p>

	<p>Exmo_10a/b: Accessible from B3178 Salterton Rd, however on the far east of the town so 3.6km from rail station and centre.</p> <p>Exmo_17: Suitable access onto Salterton Road which benefits from cycle and pedestrian links, possible secondary access onto Castle Lane, eastern edge of the town 3km from rail station</p> <p>Exmo_18: Access obtainable onto Salterton Road, a strategic road, existing ped links with potential for cycle upgrade. Eastern edge of the town 3.2km from rail station.</p> <p>Exmo_20a/b St Johns Rd is the only access which is sub standard to serve a development site of this size. Development at this scale would have a negative impact upon the local road network. Should provide contributions to Dinan Way. Eastern edge of the town, large site minimum approx. 3.2km from rail station.</p> <p>Lymp_07 Access off Exmouth Road, dependent on a new junction onto Exeter Road. This new layout would have to allow sufficient space for the Dinan Way Roundabout scheme to be built. Northern edge of the town, approx. 2.4km to station.</p> <p>Lymp_08: Accessed from Summer Lane, however this is narrow with no footways and substandard junctions. Improved links would be needed, approx. 2.4km to station.</p> <p>Lymp_09: Access to Hulham Road, should provide contributions to Dinan Way, again approx. 2.4km to station.</p> <p>Lymp_10a/b: Access to Hulham Road, should provide contributions to Dinan Way. Approx. 2.5km to station.</p> <p>Lymp_12: Access off Exmouth Road or new Dinan Way extension passes through site (contributions/construction required). Northern edge of the town, approx. 2.4km to station.</p> <p>Lymp_13: Access to public highway, contributions/construction of new section of Dinan Way likely required, again northern extent approx. 2.4km to station.</p>
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Honiton

EDDC Option Sites



EDDC suggested option proposal
(Consultation Winter 22/23)

471 dwellings
14.6 Ha employment

Background (from EDDC Role and Function of Settlements Report)

- Tier 2 settlement
- Honiton is the 3rd largest town in East Devon with a population of around 11,500 (in 2019)
- 5,694 residents are 'economically active', employment density 0.84 (4,766 local jobs and exporter of 928 workers)
- 3 employment sites – Ottery Moor Lane, Heathpark Industrial Estate, West of Hayne Lane
- One in five residents (21%) work in Exeter. 36% of residents remain in Honiton to work with other work destinations including East of Exeter, Sidmouth, Ottery St Mary, and Axminster (3-4% proportion each)
- For jobs within the town, 55% of people walk or cycle to work. Of those travelling to Exeter, a large proportion travel by car (78%), with 11% travelling by train

Access to services (from EDDC Role and Function of Settlements Report)

Strategic facilities and services

Train station

Y

Local Facilities and services

Less than hourly bus service

Y

Hourly bus service	Y	Primary school	2
Secondary school	Y	Convenience shop	174
Supermarket	Y	Post office	Y
Hospital	Y	GP Surgery	1
Leisure centre	Y	Community hall	Y
Swimming pool	Y	Library	Y
Emergency service facility	Y	Pub	Y
		Allotments	Y
		Sports playing pitch	Y
		Children's play area	Y

Of all the settlements in East Devon, Honiton is one of only three that has all of the community services and facilities above (alongside Exmouth and Axminster)

Transport

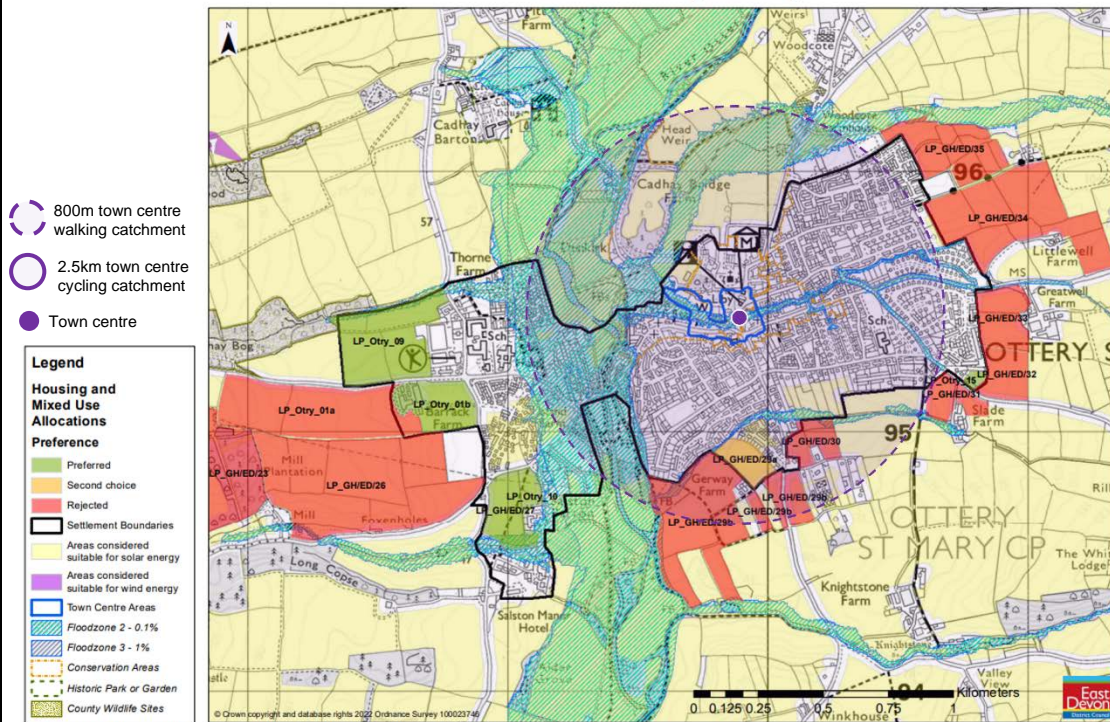
Facilities within walking and cycling distance	Reasonable walking distances are largely accepted as 2-2.5km (20-30 minutes). Honiton's most western and eastern extents are approximately 2.5km and 1.9km from the town centre respectively. This means that most facilities fall within active travel distances for most residents, and for jobs within the town 55% of residents walk or cycle to work.
Public transport network / services (rail and bus)	<p>Rail: London Waterloo mainline station in town centre (20 mins to Exeter, 3hrs to London). This station has seen a 37% increase in usage 2000-2019. Rail makes up 3% of the town's travel to work modal split, although for those commuting to Exeter this rises to 11%.</p> <p>Bus: Honiton has 14 bus routes serving a comprehensive network of 178 bus stops across the town. However, only 1% of people who live in Honiton travel to work by bus.</p>
Congestion hotspots / highway capacity issues	<p>Some peak time congestion in the town centre.</p> <p>The A30/A35 roundabout currently operates over capacity. This will need to be addressed should there be significant additional traffic.</p> <p>Turks Head roundabout operates close to capacity. Need to ensure that any increase in traffic does not cause blocking back on to the A30.</p>
Access to option sites	<p>Honi_01: Accessible from A375 Sidmouth Rd & Hayne Lane, approx. 1.7km from train station.</p> <p>Honi_02: Already under construction with Baker Estates planning permission, approx. 1.4km from train station.</p> <p>Honi_04: Accessible from A375 Sidmouth Rd, approx. 1.4km from train station.</p> <p>Honi_05: Site previously refused planning permission but not on highway grounds. Central location, 500m from train station and the High Street</p> <p>Honi_06: Accessible from Honiton Bottom Rd fairly central location, approx. 700m from train station and 1km from the High Street.</p> <p>Honi_07: Accessible from Waterleat Avenue. Southern edge of the town yet 500m from train station and 800m from the High Street</p>

	<p>Honi_08: Accessible from Glenview. 600m from High Street, 500m from station.</p> <p>Honi_09: Accessible from Langford Rd not from A30 or A35. A30 severs site from town, route via Northcote Hill (bridge) approx. 2km to station and High Street.</p> <p>Honi_10: Adjacent to A30 (no access), 700m to High Street, 1.4km to station.</p> <p>Honi_11: Central location approx. 200m to High Street, 550m to station.</p> <p>Honi_12: 600m to station, 1km to High Street</p> <p>Honi_13: Southern edge of the town yet 500m from train station and 800m from the High Street.</p> <p>Honi_14: Access via Northcote Hill. 1.2km to High Street, 1.6km to station. Limited existing active travel and bus links.</p> <p>GH/ED/39a: Access via Northcote Hill, single track road. 1.4km to town centre (17mins walking, 5mins cycling) and 2km to rail station (25 mins walking, 7mins cycling). Very limited existing bus or active travel links.</p> <p>LP_GH/ED/39b: Access via Northcote Hill, note railway bridge. 1.4km to town centre (17mins walking, 5mins cycling) and 2km to rail station (25mins walking, 7mins cycling). Limited existing active travel and bus links.</p> <p>Gitti_03/04 Vehicle access via Hayne Ln, quick access to A30 westbound, access to A30 eastbound through current industrial estate. 3km walk to rail station, some nearby bus services.</p> <p>Gitti_05: Access via Hayne Ln, note railway bridge. Approximately 3.2km walk to rail station, and 2.8km to town centre. Limited existing active travel and bus links. Near railway, potential for train station.</p> <p>Gitti_06: Suitable access off Hayne Lane with a potential secondary/emergency access route through Baker estates. Potential for a train station, existing bus service limited, limited ped and cycle links into town, 2.5km to existing centre.</p>
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Ottery St Mary

EDDC Option Sites

East Devon Local Plan 2020-2040 - Ottery St Mary



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

EDDC suggested option proposal
(Consultation Winter 22/23)

288 dwellings 1.25 Ha employment

Background (from EDDC Role and Function of Settlements Report)

- Tier 2 settlement
- Sidmouth is the 6th largest town in East Devon with a population of around 5,600 (in 2019)
- 2,430 residents are 'economically active', employment density 0.67 (1,626 local jobs and exporter of 804 workers)
- Employment site at Fimmimore Industrial Estate.

Access to services (from EDDC Role and Function of Settlements Report)

Strategic facilities and services		Local Facilities and services	
Train station	N	Less than hourly bus service	Y
Hourly bus service	Y	Primary school	1
Secondary school	Y	Convenience shop	72
Supermarket	Y	Post office	Y
Hospital	Y	GP Surgery	1
Leisure centre	Y	Community hall	Y
Swimming pool	N	Library	Y

Emergency service facility	Y	Pub	Y
		Allotments	Y
		Sports playing pitch	Y
		Children's play area	Y
Ottery St Mary has nearly all of the facilities above, with the exceptions being a train station and a swimming pool. The nearest train station to Ottery St Mary is in Feniton.			
Transport			
Facilities within walking and cycling distance	Reasonable walking distances are largely accepted as 2-2.5km (20-30 minutes). Nearly all of Ottery St Mary falls within a 1km radius of the town centre. This means that facilities fall within active travel distances for most residents.		
Public transport network / services (rail and bus)	Bus: Ottery St Mary is served by a handful of bus services, the most frequent of which are the 44 to Exeter and Honiton and 44a to Axminster (hourly). Other routes include the 382 to Whimble and Feniton (closest rail connections) and 387 to Sidmouth and Gittisham.		
Congestion hotspots / highway capacity issues	Some peak time congestion in the town centre and routes to the A30		
Access to option sites (including HELAA Highways Comments)	<p>Otry_1a/b: Site adjoins existing highways at Exeter Road and Cadhay Lane. Planning application submitted (20/1504/MOUT) provided a new roundabout on Exeter Road and a new junction with Cadhay Lane. Approx. 1km to town centre from eastern part of the site (1b).</p> <p>Otry_09: Site adjoins existing highways at Exeter Road and Cadhay Lane. Planning application submitted (20/1504/MOUT) access should be from this new roundabout. Approx. 1.2km to town centre.</p> <p>Otry_10/ GH/ED/27: Significant improvements to ped/cycle access along Strawberry Lane would be required between the site access and Barrack Road B3174. Approx. 1km to centre of the town.</p> <p>Otry_15: A new or improved access with adequate visibility would be required on to Slade Road, as would the extension of the speed limit. to the south-east. Again, approximately 1km to centre of the town.</p> <p>GH/ED/23: Access route to be confirmed, most westerly site approximately 2km from the centre of Ottery St Mary.</p> <p>GH/ED/26: Access likely possible via Strawberry Lane, likely requirement for improved ped/cycle access. Site approx. 1.4km from town centre</p> <p>GH/ED/29a: Access to Sidmouth Road via Geraway Close needs to be confirmed. Improvements to the access on to Sidmouth Road, possible extension of the speed limit, and ped/cycle links to the adjoining Geraway Close Field would be required. Only 650m from town centre.</p> <p>Otry_11/ GH/ED/29b: Improvements to Sidmouth Road and adjoining Geraway Close and/or Claremont Field would be required. Vehicular access from the south western end of Claremont Field may be possible. Site approximately 800m from town centre.</p>		

	<p>GH/ED/30: Possible access from Geraway Lane, again improvements to Sidmouth Road likely required. Site is located approx. 550m from the centre of Ottery St Mary.</p> <p>GH/ED/31: Possible access from Slade Road, located approximately 1km from town centre.</p> <p>GH/ED/32: Possible access from Slade Road, located approximately 1km from town centre.</p> <p>GH/ED/33: Possible access from Slade Road through adjacent site or Chineway Road to the north. Site is around 1km from the centre of the town.</p> <p>GH/ED/34: Possible access via adjacent road, Higher Ridgeway. Located approx. 1km from town centre.</p> <p>GH/ED/35: Possible access via adjacent road, Higher Ridgeway. Site located around 1km from town centre.</p>
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Seaton

EDDC Option Sites

- 800m town centre walking catchment
- 2.5km town centre cycling catchment
- Town centre

East Devon Local Plan 2020-2040 - Seaton

Legend

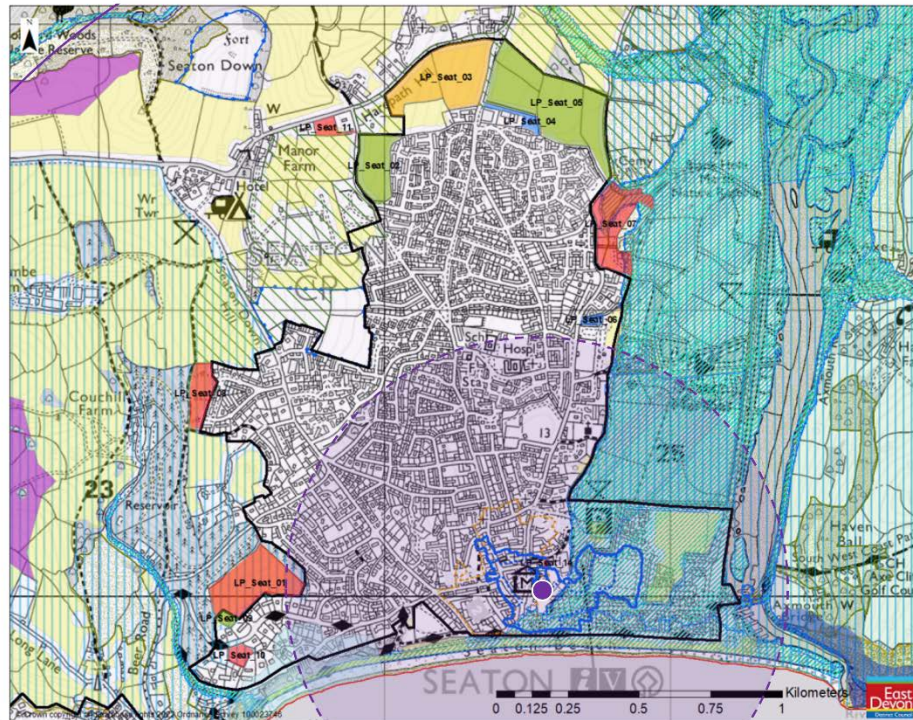
Housing and Mixed Use Allocations

Preference

- Preferred
- Second choice
- Rejected
- Planning permission granted

Other Legend Items:

- Settlement Boundaries
- Areas considered suitable for solar energy
- Areas considered suitable for wind energy
- Coastal Change Management Areas
- Town Centre Areas
- Primary Shopping Areas
- Coastal Preservation Areas
- Green Wedge
- Floodzone 2 - 0.1%
- Floodzone 3 - 1%
- AONBs
- Conservation Areas
- Scheduled Ancient Monument
- Sites of Special Scientific Interest
- Special Areas of Conservation
- County Wildlife Sites
- Outside EDDC boundary



n.b. Items in the Legend that appear in regular type are for consultation; items in italics are for information only

EDDC suggested option proposal
(Consultation Winter 22/23)

217 dwellings
2.2ha of employment

Background (from EDDC Role and Function of Settlements Report)

- Tier 2 settlement
- Seaton is the 4th largest town in East Devon with a population of around 7,500 (in 2019)
- 2,774 residents are 'economically active', employment density 0.73 (2,034 local jobs and exporter of 740 workers)
- 4 employment sites – Harbour Road Industrial Estate, Harepath Industrial Estate, Colyford Road and Land North of town, Harepath Road.
- 79% of residents work in locations in East Devon, with 34% remaining in Seaton itself, 8% travelling to Axminster, 7% to Sidmouth, 3% to Honiton and 2% to both Exmouth and Sidford. Only 9% of workers from Seaton travel to Exeter for work.
- For jobs within the town, 62% of people walk or cycle to work. Of those travelling to Exeter, a large proportion travel by car (81%), with 8% travelling by bus

Access to services (from EDDC Role and Function of Settlements Report)

Strategic facilities and services

Train station

N

Local Facilities and services

Less than hourly bus service

Y

Hourly bus service	Y	Primary school	1
Secondary school	N	Convenience shop	120
Supermarket	Y	Post office	Y
Hospital	Y	GP Surgery	2
Leisure centre	Y	Community hall	Y
Swimming pool	N	Library	Y
Emergency service facility	Y	Pub	Y
		Allotments	Y
		Sports playing pitch	Y
		Children's play area	Y

Seaton has the majority of strategic facilities and services, and all of the local facilities and services. The strategic facilities missing are a train station for which the nearest is 7 miles away in Axminster, a secondary school and a swimming pool.

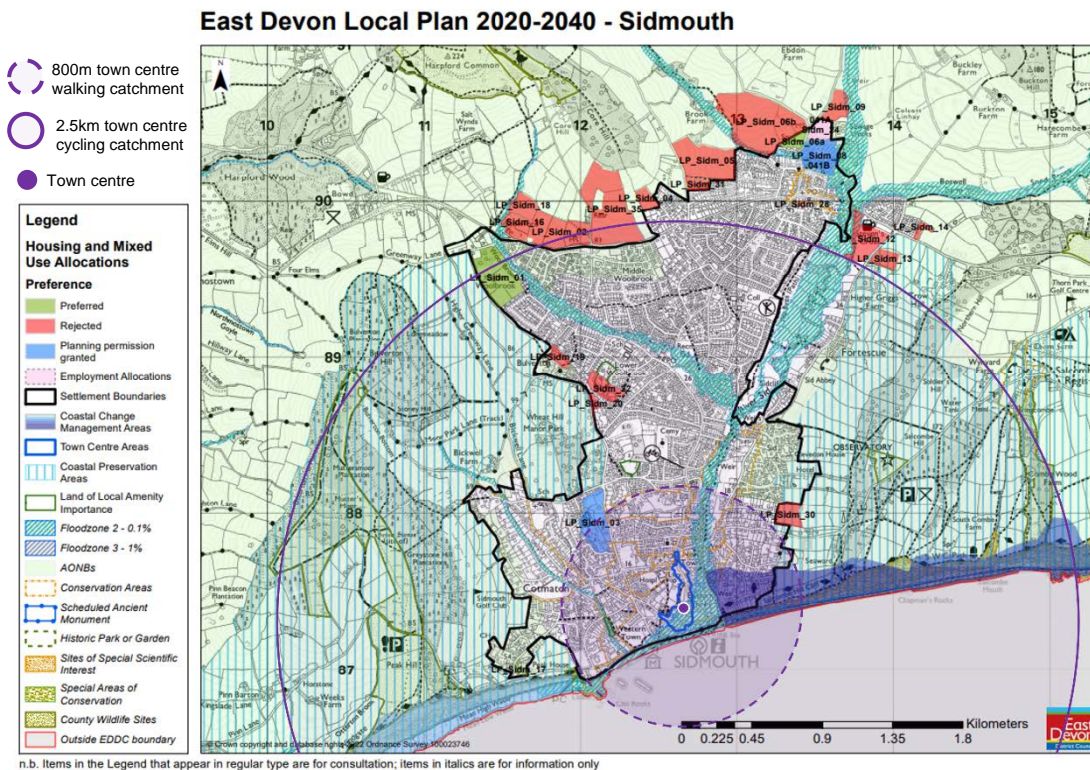
Transport

Facilities within walking and cycling distance	Reasonable walking distances are largely accepted as 2-2.5km (20-30 minutes). Nearly all of Seaton falls within a 1.8km radius of the town centre. This means that most facilities fall within active travel distances for most residents, and for jobs within the town 62% of residents walk or cycle to work.
Public transport network / services (rail and bus)	<p>Rail: Nearest rail station is in Axminster, approximately 7 miles away.</p> <p>Bus: Seaton is served by 14 bus routes, covering destinations including Exeter, Taunton, Honiton, Sidmouth, Lyme Regis and Exmouth. In total, 5% of workers from Seaton use the bus for commuting. All proposed development sites are within 400m of an existing bus stop.</p>
Congestion hotspots / highway capacity issues	Minor peak time congestion is seen towards the town centre. No major congestion hotspots or capacity issues observed.
Access to option sites (including HELAA Highways Comments)	<p>Seat_01: No access difficulties. Direct and level access onto Beer Road, with potential for cycle/ped access onto Bunts Lane, Beer Road and West Acres. Approximately 1km from the town centre.</p> <p>Seat_02: Accessed via Barnards Hill which is very narrow, with no footways. A new access could be created from Poplar Drive, and footway improvements are possible within the development. The site is well situated with respect to local facilities. Approximately 1.7km from the town centre.</p> <p>Seat_03: No objections to this site from a highways point of view. Site is approximately 1.9km from the town centre and main shopping area.</p> <p>Seat_04: Access to this site would need to come via a private road which currently serves the auction centre and industrial units. The road layout conforms to adoptable highways standards at its junction with Harepath Road, but the construction of the road will need to be confirmed. Approximately 1.7km from the town centre.</p> <p>Seat_05: Vehicle access would be gained from Harepath Road. Potential for access via a private road currently serving the Auction Centre and Industrial units. The road conforms to adoptable highway</p>

	<p>standards at the junction with Harefield Road. Approximately 1.8km from the town centre.</p> <p>Seat_06: Site access from Colyford Road. Approximately 1.0km from the town centre.</p> <p>Seat_07: Level access is provided from Colyford Road. Additional secondary access for emergency/ped/cycles available on Marsh Lane. Approximately 1.4km from the town centre.</p> <p>Seat_08: Accessible via Churston Rise and Upper Churston Rise. Two connections could provide emergency access for this parcel of land. Ped/cycle links are possible in a Manual for Streets design. Approximately 1.5km from the town centre.</p> <p>Seat_09: Accessed via Beer Road. Site access would be level and provides the possibility for pedestrian and cycle access. Approximately 1.2km from the town centre.</p> <p>Seat_10: Access would be provided with a new access onto Beer Road. Access onto Beer Road would be in a national speed limit zone. Visibility splay is on the outer side of the concave and so should be constructable. Beer Road has ped links but no cycle facilities. Approximately 1.1km from the town centre.</p> <p>Seat_11: Accessible from A3052. Junction with Barnards Hill Lane was a potential issue but has since been made one way. No ped or cycle links on the A3052. Approximately 1.9km from the town centre.</p>
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Sidmouth

EDDC Option Sites



EDDC suggested option proposal
(Consultation Winter 22/23)

168 dwellings
0.51ha of employment

Background (from EDDC Role and Function of Settlements Report)

- Tier 2 settlement
- Sidmouth is the 2nd largest town in East Devon with a population of around 13,300 (in 2019)
- 4,880 residents are ‘economically active’, employment density 1.03 (5,017 local jobs and importer of 137 workers)
- 3 employment sites – Alexandria Road Industrial Estate, Manstone Lane and Sidford Employment Site.
- Nearly one in five residents (18%) work in Exeter. 44% of residents remain in Sidmouth for work, with other work destinations including Sidford (9%), Honiton, Exmouth and Ottery (all 2-3%).
- For jobs within the town, 76% of people walk or cycle to work. Of those travelling to Exeter, a large proportion travel by car (80%), with 12% travelling by bus.

Access to services (from EDDC Role and Function of Settlements Report)

Strategic facilities and services		Local Facilities and services	
Train station	N	Less than hourly bus service	Y

Hourly bus service	Y	Primary school	1
Secondary school	Y	Convenience shop	185
Supermarket	Y	Post office	Y
Hospital	Y	GP Surgery	2
Leisure centre	Y	Community hall	Y
Swimming pool	Y	Library	Y
Emergency service facility	Y	Pub	Y
		Allotments	Y
		Sports playing pitch	Y
		Children's play area	Y

Sidmouth has nearly all of the facilities above, with the only exception being a train station. The nearest train station to Sidmouth is in Feniton.

Transport

Facilities within walking and cycling distance	Reasonable walking distances are largely accepted as 2-2.5km (20-30 minutes). Sidmouth's most northern extent from the town centre is approximately 3km, which means that not all facilities are likely to fall within active travel distances for all residents. However, the majority of the residents are located with active travel distances to the facilities, with 76% of residents who work in the town either walking or cycling to work.
Public transport network / services (rail and bus)	Rail: Nearest railway station is in Feniton, approximately 9 miles away. Bus: Sidmouth is served by 8 bus routes, covering destinations including Exeter, Taunton, Honiton, Seaton, and Exmouth. In total, 3% of workers from Sidmouth use the bus for commuting. All proposed development sites are within 400m of an existing bus stop.
Congestion hotspots / highway capacity issues	Some peak time congestion in the town centre. Peak time congestion is seen at the junction between the A3052, A375 and Sidford Road in the Sidford area of Sidmouth.
Access to option sites (including HELAA Highways Comments)	Sidm_01: Vehicular access easily achievable from Woolbrook Road. Provision of a continuous footway and improved pedestrian crossing facility across the A3052 would be required. Approximately 2.1km from the town centre. Sidm_02: No vehicle access difficulties. Highway access is possible via adjacent roads. Needs ped/cycle link to town centre and a toucan crossing of A3052. Approximately 2.25km from the town centre. Sidm_03: Access is via existing access road from Station Road. Approximately 0.6km from the town centre. Sidm_04: Access via Coreway. Coreway is steep with no footways. Its junction with High Street inadequate with respect of geometry and sight lines to the east to support any further development. Approximately 2.4km from the town centre. Sidm_05: Access off Burscombe Lane, which would need widening. A continuous footway to the A3052 would also be required. Approximately 2.6km from the town centre. Sidm_06, 08, 09, 24: Access off A375. Provides an opportunity for highway improvements including widening and a comprehensive

	<p>series of ped/cycle improvements, including the Sidmouth to Sidbury all purpose trail. Approximately 2.75km from the town centre (site sidm_06a).</p> <p>Sidm_12, 13,14: Edge of Sidmouth sites. Highway access is achievable via adjacent roads. Would need ped and cycle links to the town centre. Approximately 2.4km from the town centre (site sidm_12).</p> <p>Sidm_16, 18: Edge of Sidmouth site, highway access is possible via adjacent roads. Would need ped and cycle links to town centre, and a toucan crossing of the A3052 Approximately 2.5km from the town centre (site sidm_16).</p> <p>Sidm_17: Site is accessible via two points. Access to the north could be achieved via Cotmanon Road, however this road is very narrow with no footway. Alternative access would be via a drive into the Belvedere from Peak Hill Road. Approximately 1.25km from the town centre.</p> <p>Sidm_19: Site is accessed from Dark Lane which is a narrow rural road, only suitable for very limited development. Access via Bulverton Park could be achieved and would be preferable but would require land acquisition. Approximately 1.6km from the town centre.</p> <p>Sidm_20, 22: Vehicle access via the B3178 possible with a roundabout junction being preferred. Ped/cycle facilities would need improvement and contributions. Approximately 1.3km from the town centre (site sidm_22).</p>
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