



Strategic Planning
Devon County Council
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27 January 2012

Dear Mrs Little,

RE: The New East Devon Local Plan 2006-2026 (December 2011)

Thank you for the opportunity to comment on the above document. The consultation document is welcomed as an important step towards the adoption of a comprehensive planning policy framework which will provide a sound basis for the future development in the District.

The attached table sets out a number of detailed comments and suggestions which I hope will help inform future drafting of the Local Plan. Below is a summary of broader issues identified when reviewing the document. These are matters upon which the County Council would particularly welcome the opportunity to work with the District in developing an appropriate way forward in developing the plan.

Future Growth and Development Needs

The County Council broadly supports the overall scale of housing provision and employment land allocation to be planned for. The proposed distribution of development, with a focus on East Devon's West End (including the further expansion of Cranbrook) and concentration on a limited number of market towns is also endorsed as it promotes self containment and sustainable patterns of travel.

Given the scale of growth envisaged for the area it will be particularly important to ensure that there is effective phasing of proposed development so as to ensure that the best advantage is taken of existing and planned infrastructure investment - avoiding the dissipation of resources. The consideration of development and infrastructure investment phasing within the East Devon area will therefore need to have regard to existing and emerging proposals for development in the wider Exeter Growth Point area, both within the City and in neighbouring parts of Teignbridge District. It would be helpful to have further discussions on these issues now that the Exeter Core Strategy will shortly be adopted and the draft Teignbridge Plan is currently out for consultation.

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The County Council does have some specific concerns about the scale of growth at Axminster (transportation issues) and Redhayes (related to the phasing of development) and these are set out in the attached schedule. There are also issues relating to the phasing of the road around Science Park (Tithebarn Lane Link Extension).

Policy Wording

The Local Plan needs to set out a set of strategic policies which provide a comprehensive framework for the future development of the area, and in this respect it is considered that there is a need for some additional policy guidance especially relating to transport and infrastructure delivery. Similarly, the Plan will need to include an effective set of DM policies, and here again there is considered to be a need to widen the scope of DM policies in some specific topic areas. There are also a number of specific policy areas where there is a need for a co-ordinated cross boundary approach, including for example coastal planning, renewable energy, landscape policy and green infrastructure more generally. There is therefore a need for effective joint working between authorities, as recognised in the emerging National Planning Policy Framework. The County Council would welcome the opportunity to work with the District and others to ensure necessary consistency in this respect.

Infrastructure

The document helpfully identifies some specific elements of infrastructure necessary to facilitate the plan, but these are focused primarily on strategic transport schemes. Other infrastructure requirements - for example to support services for children and young people (schools, youth, early years and children's centres) - need to be more clearly recognised in the document and in the development of the Infrastructure Delivery Plan that will be prepared to secure its delivery. We look forward to working together on developing an Infrastructure Delivery Plan (covering the full range of services which DCC has responsibility for) which will aid the consistent identification of infrastructure needed to support future growth. This work will also need to involve the development of secure arrangements for funding and implementation.

Water Management and Sustainable Drainage

Devon County Council, as Lead Local Flood Authority (with responsibility for SUDS approval) in the emerging legislation and guidance under the Flood and Water Management Act would welcome further discussion to ensure an appropriate policy is included in the plan. Chapters 7-15 of the consultation document deal with specific locations and identify flood risk issues, but this is generally based on Flood Zone 2/3 and therefore would benefit to a wider consideration to all Local Flood Risk, such as surface water and groundwater.

I hope the above comments and the more detailed response set out in the attached table are helpful in moving forward towards a sound plan. We will of course be happy to discuss these issues in greater detail, and look forward to working closely with the District in taking the plan forward over the coming months.

Yours sincerely,



Joe Keech
Head of Strategic Planning

Devon County Council – Detailed Comments
The New East Devon Local Plan 2006-2026 (December 2011)

ITEM	REF POINT	COMMENTS
1	General Comments	<ul style="list-style-type: none"> Throughout the document, reference to the Jurassic Coast and/or the World Heritage Site should more appropriately be called the Dorset and East Devon Coast World Heritage Site (being its formal designated name). 'Scheduled Ancient Monument(s)' should be changed to 'Scheduled Monument(s)' throughout, 'Sites and Monuments Register' should be changed to 'Historic Environment Record' throughout, and 'County Archaeological Service' should be changed to 'Historic Environment Service' throughout.
PORTRAIT OF EAST DEVON		
2	Para 2.1-2.4	It would be appropriate to mention the environmental designations present in East Devon in the Pen Portrait e.g. AONB x2, WHS, NNR, Ramsar, SAC etc
VISION FOR EAST DEVON TO 2031		
3	Para 3.1-3.14	The Vision should say more about the future in terms of accessibility, transport (including access to Exeter and wider UK as well as local), community facilities (including schools) and how the issue of climate change is being addressed (low carbon development, renewable energy exploitation).
4	Para 3.3	Suggest rephrased to "We intend this Local Plan to keep East Devon as an outstanding place to live. The natural environment will be protected for the vital services and benefits to our wellbeing that it provides, job creation will raise average earnings and homes will become more affordable. Affordable homes are a top priority for this Council."
5	Para 3.4	Historic and attractive urban environments should also be safeguarded. Suggest rephrased to "We will safeguard the rural country and coast and historic fabric of our urban environments for the enjoyment of residents and visitors".
6	Para 3.7	<p>We suggest this text refers to partnership working with the Local Highway Authority to secure transport and infrastructure outcomes and investment.</p> <p>Reduction in commuting is not just about providing local employment – but more about providing for housing where there are local employment growth prospects. (The Plan does rightly seek to achieve this)</p> <p>Suggest text could refer to employment land provision - rather than employment land growth.</p>
7	Para 3.9	The plan is more accurately proposing to further expand Cranbrook rather than "allocate it"
8	Para 3.11	Recommend text amended to make the intrinsic link between the environment and economic and social wellbeing more definite. Text should also reflect the historic environment, or refer to the wider environmental quality of East Devon rather than focussing on the natural environment (and referring to human created environments as 'natural') and ecological networks.
KEY ISSUES AND OBJECTIVES		
9	Para 4.1	<p>4.1h It is England's only <u>natural</u> world heritage site (suggest include natural). This text refers to nationally protected landscapes only. However, the Devon policy context is to sustain and enhance the distinctive qualities and features of all Devon's landscape, recognising that some landscapes outside nationally designated areas are highly valued locally. PPS7 promotes the use of landscape character assessments to define variations in character, and highlight key characteristics and valued qualities that people want to see protected and managed in all landscapes. Given that the draft NPPF only promotes the protection of AONBs, National Parks and the undeveloped coast, there is a significant concern that without strong local landscape policies, Devon's landscape as a whole will not be given sufficient weight in balancing the need for sustainable development. The Local Plan should therefore consider strengthening its landscape policy position.</p> <p>Section 4.1 should also include archaeological assets under a new heading or by either widening the section on 'built heritage'. This should cross-reference to (g) Green Infrastructure and (h) Landscape and AONBs. PPS5 Policy HE 3.1 requires LDFs to set out positive proactive strategies for the conservation and enjoyment of the historic environment.</p>

POLICY CONTEXT AND PUBLIC ENGAGEMENT		
10	Para 5.4	The list should include the Minerals and Waste Local Development Frameworks, Shoreline Management Plans, Catchment Flood Management Plans and Marine Plans.
11	Para 5.6	Suggest text amended: '.....Sites designated under European legislation and include the Exe Estuary, the Pebblebed Heaths, the River Axe corridor and the <u>undeveloped</u> coastline between Sidmouth Seaton and Lyme Regis are included .' Consideration will also have to be given to the new offshore SAC designations.
SPATIAL STRATEGY		
12	Para 6.1	This refers only to the District's outstanding 'natural environment'. Should be natural and historic, or just outstanding environment.
13	Draft Strategy 3	In order to protect local identity and distinctiveness and strengthen people's sense of belonging to the area, it would be useful to add 'and character' after 'the quality' (of the landscape).
14	Draft Strategy 4	While the objective for balanced communities is understood, it is not possible to require the creation of new employment as suggested. The plan needs to recognise the realistic economic growth potential in each area and locate new housing provision where it is accessible to that potential. This will best achieve the objective to reduce commuting and balance housing and employment provision. Strongly support (b) and the need to secure necessary education provision. This point could also include mention of Green Infrastructure.
15	Para 6.23	Critically this should also refer to the historic and built environment as a key economic benefit. Visitor surveys tend to show that more people visit the SW for wider environmental and landscape interest, not the purely natural or ecological interest.
16	Draft Strategy 5	This is primarily about biodiversity. It needs to take a wider view of 'environment', relating more strongly to emerging ideas on ecosystem services and green infrastructure. This strategy should also include archaeological and built environment – or 'historic environment'. It is recommended that this section is reviewed with reference to the Guiding Principles within the Devon Green Infrastructure Strategy. This is currently undergoing revision following consultation and will be published in March 2012.
17	Para 6.24	Text refers more generally to 'environment' which is welcome, but confusing given earlier use of 'natural' and 'built'.
DEVELOPMENT OF EAST DEVON'S WEST END		
18	Para 7.1	The paragraph states that East Devon's West End will "be built to the highest level of sustainability". Although the intention is fully supported, it might be more accurate to say the "highest possible" level.
19	Para 7.2	This paragraph states that "Buildings in the growth point area will be designed to the highest sustainability standards". As above, suggest this statement should be rephrased.
20	Para 7.3	Devon County Council has played a direct and significant role in securing investment and delivery in this area and this should be recognised in the plan.
21	Draft Strategy 6	While it is important that the phasing of proposed development at Blackhorse/Redhayes should not impact on the delivery of sustainable development at Cranbrook, it may be appropriate to provide for an element of that proposal, related to employment at the Science Park, to be brought forward at an earlier than indicated in (3). One of the key advantages of the West End development strategy is that new housing will be closely located to future jobs. This offers a major opportunity to encourage relatively short distance trips to be made on foot or by cycle. There is little reference within the strategy to the importance of walking and cycling in supporting sustainable and healthier ways of travelling. Cranbrook, Skypark, Science Park and the Monkerton development will be linked by a high quality cycle route, and it is important that this is referenced within the wording of Draft Strategy 6. Suggested wording of the last sentence of the opening paragraph is "High quality walking and cycling connections; enhanced bus and rail services, and improved highway provision will be integral to the overall development".

		This section refers to 'Clyst Valley Regional Park' when there are other references in the plan to a 'Country Park'. (see comment 26 below)
22	Map (Clyst Valley Country Park)	The indicative location of the Park shown on the map is extensive and includes settlements and farmed landscapes that are in multiple private ownerships. The term 'Country Park' suggests a managed recreational land use, and single ownership/management. It may be more accurate to define the area one within which there would be a coordinated approach to green infrastructure improvements, delivering multiple benefits (including more routes and areas for recreation and access).
23	Map (Major Development in West End)	The Exeter International Airport and Exeter Airport Business Park are not included on the proposals plans. See comments on Para. 7.22 regarding 'Longer Term Road'.
24	Para 7.10	This lists rejected options and the reasons listed in Option 4 could be expanded to explain that a smaller scale development on a corridor with a poor choice of sustainable options is unlikely to be able to fund the necessary sustainable transport improvements to upgrade the existing public transport corridor to ensure a convenient and attractive alternative to the car. This could result in a car dependent community using up a disproportionately greater amount of capacity than a larger development. In our response to the East Devon Local Plan panel hearings, it was explained that there is little opportunity to create strong walking, cycling or public transport (bus and rail) links between development east of Clyst St Mary roundabout and Exeter and new jobs east of Junction 29. Options for removing trips via a conveniently situated Park and Ride site on the A376/A3052 are limited and are unlikely to sufficiently relieve the congested corridors.
25	Para 7.11	Welcome reference to GI including heritage assets. Consideration should be given to including the major prehistoric enclosure site at Redhayes as open space within the Clyst Valley GI area.
26	Draft Strategy 7	A separate strategy on GI is welcome and supported. However, it would be useful to embed GI as a primary consideration in all developments. This would reflect Principle D1 in the emerging Devon GI Strategy. Text should also mention heritage assets.
27	Para 7.18	The greatest capacity constraints relate to the Honiton Road corridor and operation of Moor Lane roundabout. Delays at Moor Lane roundabout cause queuing back towards Junction 29, which causes operational issues for the Strategic Road Network. Also, note the misspelling of Tithebarn Lane (described as Tythebarn Road).
28	Para 7.19	It is recommended that the text is amended as follows: "In January 2011 Devon County Council outlined its commitment to improving public transport and other forms of green travel. In its briefing note, Devon Metro – fulfilling the potential of rail, one of the aims is to promote opportunities to enhance rail travel into Exeter to help facilitate economic growth and a reduction in carbon emissions. In the short term, new stations and service improvements are planned within Exeter and at Cranbrook, with newer rolling stock providing capacity improvements in the medium term. In the longer term, more costly options such as passing loops would be required to support continued development of the rail system".
29	Para 7.20	Recent discussions with Network Rail have suggested that it is preferable to seek rail outcomes rather than to identify specific infrastructure as it may be possible to deliver improvements in alternative, more flexible ways. The last sentence could be changed to: "In the longer term, due to single track constraints, more costly infrastructure would be needed to support increased frequency on the Exmouth line or to achieve a half hourly service to Cranbrook and Axminster." Also, note that the Route Utilisation Strategy was produced by Network Rail, not Railtrack.
30	Para 7.21	This text does not emphasise the criticality of the Clyst Honiton Bypass to the delivery of the growth proposals in the West End. Paragraph should say "critical investment", rather than just "improvements". Given that the major scheme bid for a 'high quality public transport' system is no longer being progressed, it is recommended that the 3 rd bullet point is changed to "A new bus route and service linking the West End sites to Exeter City Centre, which includes a twice hourly service to Ottery St Mary and Honiton. As development progresses in the West End, it is anticipated that the service frequency between Exeter and Cranbrook is increased."

31	Para 7.22	<p>The text states that the Science Park road will serve as an access road between the old A30 and Cumberland Way for up to 4000 dwellings before an alternative parallel route is needed.</p> <p>A number of factors affect the acceptability of using this route as an interim link road, and we do not consider that the identification of a specific trigger point is helpful. There are however, ongoing discussions involving the County Council and District Council regarding phasing of development and infrastructure in this area, the outcome of which will need to be reflected in future versions of the plan.</p>
32	Para 7.23-7.24	<p>Given the poor existing choice of sustainable transport options on the A3052 corridor, it will be challenging to deliver any significant improvements to reduce reliance on the private car. Any scale of development is likely to result in car dominated travel behaviour, making it difficult to address existing congestion issues on the M5 Junction 30/A376/Clyst St Mary routes. A smaller scale of development (i.e. 1000 dwellings) is likely to have a higher proportion of residents travelling by car due to the limited sustainable transport improvements it could deliver. The level of investment required to support new and improved bus services or park and ride to mitigate additional traffic impacts on the corridor would be substantial and unlikely to be deliverable. Unlike the A3052, the Cranbrook, Skypark, Redhayes, Science Park developments will be linked by high quality walking and cycling routes and served by high quality bus and rail services.</p>
33	Draft Strategy 8	<p>First paragraph should name Devon County Council as a key partner organisation in the planning and delivery of infrastructure.</p> <p>In the Local Transport Plan 2011-2026, Devon County Council has moved away from the concept of a hierarchy of modes and instead recognises the need to offer a choice of quality sustainable alternatives, taking into account the site specific needs of a development. For instance, it may be that a particular location is better suited to investment in public transport rather than walking or cycling. It may also be necessary to undertake highway improvements to provide congestion relief and enable improvements for pedestrians and cyclists (or bus priority measures). Maximising use of sustainable alternatives is fundamental in supporting sustainable economic growth in the West End; however there is still a need to accommodate essential car trips and provide sufficient capacity to enable the whole transport system to operate efficiently.</p> <p>Devon County Council welcomes the inclusion of the need for coordinated waste <i>management</i> infrastructure in the West End. However, it is suggested that a waste facility in such a location should not be limited to waste 'disposal' as is currently drafted. 'Waste management facilities' would be more appropriate terminology here.</p> <p>The Local Plan does not appear to make reference to the required waste water treatment provision for East Devon's West End developments. Planning permission for a waste water treatment works at Mill Lane, West Clyst was granted by DCC (as a renewal of the old consent) in April 2011 - EDDC reference 10/1004/CM. As this is an extant permission and is required for the development of Cranbrook (and other developments in the area) it ought to be identified in the Local Plan.</p>
34	Para 7.28	<p>To avoid confusion, the 2nd bullet point should refer to "...development south of the old A30".</p>
35	Para 7.30	<p>Cranbrook will not really be self contained in terms of employment – but is accessible to a wide range of employment opportunities. This is recognised in Draft Strategy 9.</p>
36	Para 7.32	<p>The major scheme bid concept of 'high quality public transport' has been dropped; however the town is still expected to be served by frequent bus services on routes with priority measures to provide competitive journey times to the private car.</p> <p>An important part of the sustainable transport strategy for the West End, and not covered in the section on Cranbrook, is the cycle connections. The need to provide attractive cycle routes linking new developments west and east of the motorway via the new Redhayes cycle bridge will help minimise car use and encourage healthier, more active lifestyles. There is little recognition of this mode within section 7 given its potential for short to medium distance journeys.</p> <p>The location of Cranbrook Rail Station means that many residents living in the expanded development will be outside the recommended walking distance for rail access. Cycling will</p>

		therefore prove an attractive alternative, including for neighbouring villages including Broadclyst.
37	Draft Strategy 9	<p>It is recommended that the final sentence of the opening paragraph be changed to “Open spaces and facilities will be readily accessible to all residents with convenient and attractive pedestrian and cycle links to local destinations and access to high quality public transport services”.</p> <p>Further detail is needed in the numbered part of the strategy in terms of education (primary and secondary provision) and transportation infrastructure.</p> <p>Transport Modelling has indicated that impacts would have an unacceptable impact at Junction 29 post 3500 dwellings at Cranbrook without a road connection between the old A30 and Cumberland Way. The Cranbrook development will therefore be dependent on the provision of this connection and improvements to the bridge to provide safer access for all users. Public transport access will need enhancing through bus priority measures, increased frequency of buses and improved rail connections.</p> <p>Education In education terms, with development up to 7,500 dwellings we would anticipate a 1,000 place secondary school (11-16 including 435 from first 2,900 dwellings). A further 4,000 homes (above the existing 3,500), would need another two primary schools (420 places plus early years, land etc.) in addition to the provision already secured within the current planning approval for 2,900 dwellings.</p>
38	Para 7.38	<p>This could also include explain that the development would be within easy walking and cycling distance of employment opportunities at Skypark, Science Park and Exeter Business Park (via the Redhayes bridge) and therefore has potential to minimise reliance on the private car.</p> <p>If there are plans for the Science Park development to offer social and community facilities, including cafes and retail, it would seem sensible to combine this with any neighbourhood centre for North of Blackhorse/Redhayes.</p>
39	Para 7.39	<p>Redhayes will not include a “full range” of community facilities – e.g. it will not offer secondary education, and potentially, not primary (detail below). It will not have a library, and the retail offer will be very limited. It will however be a local centre meeting the area’s immediate needs.</p> <p>The scale of development is on the margins of being able to support on site primary provision. On the basis of 600 dwellings, with a relatively high proportion of 1 bedroom units, it may not be appropriate to locate a Primary School on site.</p>
40	Para 7.41	See comment in relation to paragraph 7.22.
41	Draft Strategy 10	<p>Support the intention of (1) to target occupancy by Science Park employees.</p> <p>(3) this needs to be more realistic in terms of the range of facilities that can be secured (see comment above).</p> <p>The final sentence of the opening paragraph should be amended to “...and be linked by pedestrian, cycle and bus routes to the jobs available in Science Park and Skypark”.</p>
42	Para 7.45	It is recommended that the wording is amended to “Land North of Pinhoe has capacity to accommodate 800 dwellings (which includes a resolution to grant permission for 450 dwellings) and provision has been made for 3 hectares of employment land. This capacity constraint is determined by highway limitations and a need to provide a sufficient number of dwellings to support a new primary school. New development will need to secure enhancements to existing bus services and improved access to rail connections. Improved cycle routes should also be planned, providing safer, more direct routes to key education and employment destinations. A new “park and change” service will also form part of the overall development and help minimise the traffic impacts. An area wide transport strategy has been developed to address transportation issues, including planned development in the Pinhoe area within Exeter City Council boundary.”
43	Draft	It is recommended that the last sentence of the opening paragraph is amended to “Open

	Strategy 11	<p>spaces and facilities will be readily accessible to all residents with improvements to local pedestrian and cycling links and enhancements to existing bus services”.</p> <p>The Pinhoe development will not include a “full range of community facilities” – e.g. it will not offer secondary education facilities and the retail offer will be very limited. It will however have a neighbourhood centre meeting the area’s immediate needs. The provision of primary education facilities is critical to the sustainable development of this area and should be specifically mentioned in (4).</p> <p>The text needs to refer to “the Pinhoe area” rather than “North of Blackhorse”.</p> <p>Infrastructure needs to refer to “...a park and change facility, enhancements to existing bus services and selected highway improvements to relieve pressure on congested parts of the network”.</p>
44	Draft Strategy 12	Reference could be made more clearly to the existing proposals (i.e. Sainsbury) with an explanation of what is actually now being proposed in addition.
45	Para 7.54-7.57	One of the key transportation priorities which will support expansion of the airport and improved access to Exeter Airport Business Park is improvements to the B3184, which serves these developments from the A30. It is currently narrow and widening works are needed to provide a better quality entrance to an international gateway. Plans are currently in place to provide a segregated route for pedestrians and cyclists, utilising the overspill car park (recognised in TA8) but the Local Plan should expand on this, including a proposal for improvements to the access road itself.
46	Para 7.59-7.63	Growth at Exeter Airport Business Park should be accompanied by a range of measures to improve sustainable transport links and the reduce dependence on private car amongst new employees.
47	Draft Strategy 14	The County Council acknowledges there may be a need for modest additional employment land allocation at the airport – but considers appropriate phasing of economic land release is critical to ensure the delivery of strategic development at Science Park and Skypark. The Plan could include guidance on the differing economic sectors that each of the main employment allocations is aimed at, so as to minimise unhelpful competition.
AXMINSTER		
48	Para 8.6	<p>Trains operate an hourly service to Exeter <u>and east to London with buses connecting to the coast and Dorset</u>, however...</p> <p>It should be emphasised that the opportunities for improving the frequency of train service to Cranbrook could include the addition of signalling infrastructure to allow trains to turn back at that location, or the provision of a passing loop to allow an increased frequency between Exeter and Honiton/Axminster. These options are being investigated by Devon County Council and the rail industry.</p>
49	Para 8.9	<p>The sustainability appraisal recognised the importance of matching housing growth and job growth at Axminster if sustainable development is to be secured. DCC strongly supports the requirement set out in paragraph 8.9 for housing development to be located in settlements offering new employment opportunities. This suggests the need for a phased approach to development through which the balance between local employment and housing growth can be assessed and managed. If employment growth was not achieved as hoped, housing growth would lead to additional commuting and reduce settlement self containment.</p> <p>Should the level of proposed development take place but the north-south link road not be secured, traffic conditions in the town could be significantly adversely affected. There is unlikely to be public funding available to help deliver the propose relief road and again a phased approach is required with safeguards to limit development in the event that the relief road is not delivered in phase with development. The plan should indicate in broad terms the level of development that would be accommodated prior to the provision of the proposed relief road.</p> <p>Although the inclusion of waste minimisation and reuse is welcomed within these sections, it is not clear how the planning process can specifically influence these levels of the waste hierarchy. It would be more appropriate if development in the market and coastal towns was subject to waste minimisation, reuse and recycling in the construction phase and designed to</p>

		facilitate recycling in the operational phases.
50	Draft Strategy 15	<p>There is no certainty or assertion within the policy wording that any north/south relief road would be delivered and funded by the proposed development. It is not the intention of Devon County Council to fund the scheme which does not appear within the Local Transport Plan.</p> <p>Preliminary studies undertaken by Devon County Council using Automatic Number Plate Surveys (ANPR) indicated that on the survey day the proportion of traffic making the movement between Chard Road and Lyme Road is low. These findings mean public investment a new road scheme would not be justified. Any road would therefore need to be delivered and funded by new development as part the access scheme to serve the development, but there is no clear evidence to show that the proposed development will secure this with any certainty. The opportunity for traffic management measures within the town centre is otherwise limited and only minor interventions may be possible.</p> <p>The Policy also proposes that development in Axminster is conditioned upon a 30 minute frequency train service to Cranbrook; this is dependent upon many constraints and issues which have yet to be fully investigated and resolved. While an increased service would be beneficial, it may not be appropriate to place this condition upon the scale of development.</p> <p>The policy wording does not currently consider education. There is pressure on schools and high inward pupil migration into Axminster, and the proposed level of development would require additional primary provision (210 plus land and early years) and contributions towards secondary provision.</p>
BUDLEIGH SALTERTON		
51	Para 9.2	Mention should be made that Budleigh is designated as a "Gateway Town" for the Dorset and East Devon Coast WHS.
52	Para 9.3	This paragraph recognises the value of the landscape extends to the Otter Estuary but there is no mention of the coast and the World Heritage Site.
53	Draft Strategy 16	We support the limited growth proposed.
EXMOUTH		
54	Para 10.2	The Plan should recognise issues arising from the Shoreline Management Plan - particularly those related to the management of defences on the Maer and across the water at Dawlish Warren which will affect the town.
55	Para 10.3	The 'Exmouth Now' paragraphs should make reference to international Birds and Habitats designations (as they do for Seaton)
56	Para 10.8	<p>Further areas for transport improvement include:</p> <ul style="list-style-type: none"> ▪ Delivery of Devon Metro aims ▪ Improved Transport interchange facilities around the train station and improved pedestrian and cycle links to the town centre. ▪ New bus route opportunities provided by the Dinan Way extension. <p>Reference could be made to opportunities for marine industry based training and employment.</p> <p>The Exe Estuary and AONB landscapes are referenced as natural assets to conserve and enhance but the World Heritage Site is missing from this list. There could also be an additional bullet "Promote Exmouth's role as the western boundary of the WHS and a WHS Gateway Town with appropriate facilities".</p>
57	Draft Strategy 17	<p>Devon County Council generally supports the proposals for Exmouth, including delivery of Dinan Way, and improved public transport links between the town and Exeter. Points 3 and 5 should mention the aim for improved links between the town centre and an enhanced transport interchange at the train station.</p> <p>The policy wording does not currently consider education. There is significant pressure on places in Exmouth, both at primary and secondary level, which is likely to see pressure on primary places for the next three to four years and then in secondary (already over subscribed) towards the end of the decade. It is likely new primary provision will be required in the medium term should development come forward and with the housing numbers</p>

		proposed, it would therefore be prudent to provide for new primary school plus early years.
HONITON		
58	Para 11.3-11.4	Text could highlight concentration of heritage assets in the medieval planned town, Roman Road, Roman fort at Pomeroy Wood, as well as prehistoric sites at Hayne Lane.
59	Para 11.5	Support the provision of employment land at Honiton but the viability of its delivery will only be secured if the demand for employment land matches the scale of provision.
60	Para 11.10	There are no education concerns regarding the proposed growth, however some investment in existing education facilities may be required.
61	Draft Strategy 18	Policy should mention the Air Quality Management Area, including how the development strategy will help reduce the impact upon the AQMA and secure funding for improvements through the emerging Action Plan.
OTTERY ST MARY		
62	Para 12.5	The Local Education Authority is concerned that the plan focuses is on secondary provision when primary provision is under significant pressure; and a development of a further 400 dwellings will further increase this pressure. The primary schools in the town and at West Hill are on constrained sites with limited/no opportunity to expand. The town is experiencing increased numbers of school age children, as it appears families (with primary/preschool children) are moving to the area in order to be in the catchment for the secondary school. Whilst the secondary school is under pressure, it does take out of area pupils (parental choice). Draft Strategy 19 should also consider primary provision. The scale of development currently proposed adds to concerns related to Primary school provision but does not provide a clear basis for securing additional capacity.
63	Para 12.7	Devon County Council has no immediate plan to relocate Ottery St Mary library.
SEATON		
64	Para 13.1	This paragraph should highlight that Seaton, as a coastal town, adjoining Axmouth Harbour, has small-scale opportunities for developing marine based employment, including fishing, marine transport, boat building and marine engineering in addition to tourism and water-sorts based development.
65	Para 13.6	Text only refers to natural environment and buildings but should recognise the area's significant historical heritage and assets.
66	Para 13.8	This text should make reference to more diverse marine related industry development. The third bullet should include specific mention of the planned Interpretation/Discovery Centre – 'interpretation facilities' is too vague and could just mean a display board. Reference to Sustrans Cycle Route in 3rd bullet from bottom should be corrected to "Devon County Council's Stop Line Way".
67	Para 13.9	Reference to East Devon Coast should be Dorset and East Devon Coast WHS.
68	Draft Strategy 20	We broadly support this policy, although Devon County Council may require contributions towards secondary school transport as pupils travel from Seaton to Axminster. There is an existing lack of youth facilities in the town which could be recognised. The text uses the general word 'environment' but there is a bias towards the 'natural' when historic considerations are being missed.
SIDMOUTH		
69	Para 14.3	Mention should be made that Sidmouth is designated as a "Gateway Town" for the Dorset and East Devon Coast WHS which offers potential opportunities for sustainable tourism etc.
70	Draft Strategy 21	Devon County Council broadly supports this policy.
SMALLER TOWNS, VILLAGES AND COUNTRYSIDE		
71	Para 15.3	An opportunity has been missed in not making special reference to the coastal environment in East Devon. This needs additional text adding to recognise its value and influence on the District.
72	Draft Strategy 22 and Para 16.46	The policy provides no indication of how improved public transport provision would be made. It should not be assumed that Devon County Council has the revenue resources to meet the accessibility implications of dispersed development. In terms of sustainable bus operation, developments on existing routes, particularly those that have a commercial potential, would be preferable.
73	Draft	Devon County Council supports the emphasis on affordable housing/local needs in the

	Strategy 23	smaller settlements and rural areas.
74	Draft Strategy 24	The text could expand on how landscape and wildlife can be improved through appropriate forms of agriculture. There are areas along the coast where intensive agriculture is carried out right up to the coast path. There would be considerable benefits to tourism to see a wider, more natural buffer to the coast in these areas (e.g. Ladram through to the Otter). Similar policy should support existing conservation initiatives near SSSI's and Local Nature Reserves for instance, where possible.
ENSURING WE HAVE THRIVING COMMUNITIES		
75	Para 16.5	As agriculture gets a special mention here it is important that marine industry and the opportunities a coastal a coastal location affords, including but not limited to tourism.
76	Para 16.7	Post 16 Education is going through extensive educational reform as indicated in the Wolf report, and the consultations on funding reform and the Raising of the Participation Age. The Government is restructuring the way it supports people attempting to enter employment, the way it supports schools and apprenticeships and the way it sees local economic development being delivered. Further work has already started on key priority areas to understand the skills need in each District Area and work with schools and colleges to identify the need of the local employer and to raise the employability of our young people in the area.
77	Para 16.11 onwards	The marine environment provides new and different opportunities for skills and employment. This is not recognised in any of this text.
78	Draft Strategy 27	Devon County Council supports the retention of existing employment land and premises.
79	Para 16.19-16.24	This should include reference to the WHS and the South West Coast path and the opportunities these present to promote sustainable, out of season, special interest tourism, helping to relieve pressure at the peak.
80	Draft Strategy 30	The % of Lifetime Homes should aspire to be higher than 20% for market units. The text only refers to the elderly, but Lifetime Homes importantly meet the needs of families with disabled children, working age disabled adults, and various mobility constraints suffered by many individuals at times of crisis/accident. Devon County Council strongly supports the proposed additional provision for Extra Care Housing. However, the policy wording specifying schemes is confusing, and needs to be amended to more clearly represent what schemes are proposed in different towns. Identification of Extra Care and Close Care schemes (and their different sizes, as not all 50 bed) should be consistent with the DCC Commissioning Strategy for Extra Care Housing.
81	Para 16.34 to 16.44	The Plan should include a strategic policy relating to education (and health) provision – setting out strategic objectives for the area and provide a basis for the policies included in Part Two of the Plan.
82	Para 16.41/16.42	These paragraphs are potentially misleading as they imply that new development may not place specific pressures on school capacity. This is clearly not the case in the areas accommodating strategic scale development and other towns can also experience locally important issues of school place capacity. While pupil numbers may reduce in some locations there will be a need for significant investment in additional education capacity within East Devon
83	Para 16.45-16.48	The Plan should include a strategic policy relating to transportation - setting out strategic objectives for the area and a basis for the policies included in Part Two of the Plan. This should also mention the West End - as the West End will accommodate approximately 50% of the total homes to be built in the district and will have over 60% of the district's available hectares for employment provision, the greatest transportation needs are likely to be in this area. The text needs to highlight that the sustainable transport corridor between Cranbrook and the edge of Exeter that will help minimise car use and encourage smarter, healthier travel mode choices. This is a fundamental part of the West End development strategy: short distances between new homes and jobs, encouraging walking and cycling; frequent bus services with priority measures offering competitive journey times to the private car; good rail connections and supporting travel planning measures to maximise use of these modes. Some selected road improvements will also be necessary to help accommodate residual traffic movements, as well as new bus routes. There may be some concern raised why particular towns and villages have been specifically mentioned in paragraphs 16.46 and 16.47 but not others. For instance, there is specific

		reference to Axminster, Honiton and Exmouth but not Ottery, Budleigh, Seaton or Sidmouth. The inclusion of an overall transportation strategy statement would make clear how the needs of all communities would be addressed – even if only through improved traffic management in some cases.
84	Draft Strategy 31	Secure designs should not be at the expense of creating permeable developments. The provision of sustainable transport links should not be prejudiced and security achieved through good design principles including natural surveillance and good visibility.
CLIMATE CHANGE		
85	Para 17.1	This makes no reference to 'coastal change adaptation'. Whilst East Devon may not be a national hot spot there are a few key areas that will be affected. The policies outlined in the SMP and the overall national policy approach from the EA should be given under this chapter or a new chapter added.
86	Climate change - What the SA told us	With wetter winters and heavier rainfall events predicted, the impacts of increased flood risk should also consider the risk from surface water and groundwater. The Locally Agreed Surface Water mapping should be used alongside the Flood Zone 2 and 3 maps.
87	Para 17.4	List of projected changes to climate and their associated impact could be more definite. Suggest this is rephrased to "The outcome for East Devon is projected to be increases in summer temperatures, more frequent and severe storms, less rainfall in the summer and more in the winter, and rising sea levels. These have the potential to increase risks to health and comfort, increase the likelihood of flooding, cause damage to buildings and infrastructure and increase building energy consumption from cooling. It is important that new development responds to these risks."
88	Draft Strategy 32	Draft Strategy 32 on Sustainable Design and Construction could be enhanced by including reference to the utilisation on a construction site of materials derived from excavation and demolition rather than their being disposed of as waste. The major development sites within the West End are mostly located over sand and gravel deposits that may yield materials capable of beneficial use, e.g. development at Cranbrook is using sand dug on site for pipe bedding, avoiding the need to buy in sand from elsewhere. There are other examples of demolition waste being crushed on site and used as fill material. The inclusion of 'handling waste' in this strategy principle is welcomed. However, it would be appropriate if this requirement was applicable to all development, regardless of scale. In addition, the current wording does not provide clarity on what 'proposals for handling waste' would include. The wording could also be stronger. This text should also make reference to design requirements for developments in flood risk areas near the coast (limited lifetime construction techniques).
89	Draft Strategy 33	Welcome reference to taking account of environmental sensitivity including heritage.
90	Chapter 18 Heading	Title should be Historic Environment rather than Built – thereby including archaeology and historic landscape.
OUR OUTSTANDING NATURAL AND BUILT ENVIRONMENT		
91	Para 18.1	The text should refer to nationally and internationally important archaeological and historic landscape heritage as well as built – or combined as historic environment.
92	Para 18.2	Support mention of heritage assets as part of GI. However, not just protection of these assets, GI offers the opportunity for proactive management, access and enjoyment of these assets (as required under PPS5 Policy HE 3.1).
93	Draft Strategy 36	Welcome commitment to GI Provision and Strategy – but note above concerns regarding its scope (e.g. narrowing of focus in the Axe Wetlands).
94	Para 18.20	Recommend text amended: "East Devon's exceptional coastline forms part of a World Heritage Site (WHS) and is mostly undeveloped. Parts of the coast are eroding and in some cases this impacts on people's livelihood and homes <u>and the natural environment</u> . We will: <ul style="list-style-type: none"> ▪ Oppose development in undeveloped coastal areas if it would have adverse landscape <u>and environmental</u> impacts unless there are no alternatives available, (such as with established holiday parks) and development is essential. ▪ Promote coastal protection measures where erosion could impact on people's livelihoods and homes where this aligns with the <u>adopted Shoreline</u>

		<p>Management Plan 2 (long-term plan) and is <u>environmentally acceptable, financially and technically</u> feasible.</p> <ul style="list-style-type: none"> ▪ <u>Create coastal change policy areas to manage transition in areas where people, property or infrastructure are likely to be at increased risk in the future.</u> <p>Reference to 'coastal change adaptation' could usefully be made here as well.</p>
95	Para 18.21	<p>First sentence should end East Devon <u>Area of Outstanding Natural Beauty</u>.</p> <p>This text should make reference to the need to regard to Marine Plans.</p>
96	Draft Strategy 38	We strongly support the intention of this policy but it needs to state more clearly what the level of development constraint will be and how this is consistent with the emerging National Planning Policy Framework.
97	Para 18.26 onwards	More specific reference needs to be made to 'coastal change adaptation' policy.
98	Para 18.27	The World Heritage Site Management plan aims to protect the Outstanding Universal Value of the site. It is incorrect to state that <i>"This plan seeks to balance this aim with the social and economic needs of our coastal communities."</i> The Plan does intend to use WHS status as a thread for communities and the economy but not to the detriment of the site itself.
99	Draft Strategy 39	<p>This is incorrect and confusing: the future approach to coastal management is defined within the SMP review so there should be a direct reference to it. There is a conflict and the issue is, where possible to balance that conflict. The WHS Team are suggesting the strategy should be along the lines of:</p> <p><u>"The Dorset and East Devon World Heritage Site will be conserved by allowing natural processes to continue. The Shoreline Management Plan identifies future coastal management options for the next 100 years. In a few areas there are conflicts between protecting the Site, by allowing it to erode, and protecting coastal communities from that erosion. There is a need to recognise both interests and, wherever possible, mitigate impacts where they arise. The SMP not only supports the construction of coastal defences but it also identifies areas at risk from coastal erosion."</u></p>
100	Para 18.36	Welcome mention of Historic Landscape Characterisation, but this approach does not appear to be directly reflected in the Policy guidance.
101	Draft Strategy 40	<p>This policy has been agreed through both the AONB Partnerships.</p> <p>Specific mention could be made to the Landscape Character Area work referenced in Para 18.36, which will provide the background evidence for using policy.</p>
102	Para 18.40	Whilst the importance of a dynamic and natural coastline is made earlier, reference could also be made for the need to ensure that biodiversity interests are served on the coast by favouring non intervention. It is an often misunderstood concept.
103	Para 18.47	Coastal squeeze and the duty to mitigate for its effects on designated coastal sites is a key point that could be introduced to support the later text.
104	Para 18.52 to 18.56	Welcome commitment to promotion of locally distinctive design and materials. It would be worth mentioning in the text that Devon County Council's emerging Minerals Core Strategy includes an objective of enhancing the supply of local sources of characteristic building materials to reinforce the distinctiveness of the county's built environment. The intention is to encourage the small-scale supply of a wider range of local building stones, particularly in areas such as East Devon where few of the area's distinctive stones are presently available.
105	Para 18.58 to 18.61	Much welcome content. However, in the absence of a separate section dealing with designated and non-designated archaeology and historic landscape, there is confusion here with the various usage of 'built environment', Listed Buildings, Scheduled Monuments, 'historic environment' and heritage assets. There should be a short section on archaeology and historic landscapes as heritage assets. A brief description of the range of archaeological sites and the number recorded on the Devon Historic Environment Record would be appropriate.
106	Draft Strategy 43	Draft Strategy is supported.
DELIVERY AND INFRASTRUCTURE PROVISION		
107	Para 19.11	This text should highlight this work will be done in conjunction with infrastructure providers, including Devon County Council.

108	Draft Strategy 44	Welcome the commitment in (1) to meet, in full, the infrastructure needs arising from new development, and the recognition of the importance of phasing investment.
MONITORING		
109	Para 20.4	Support the assessment of 5 year land supply within the West End (having regard to provision within Exeter) and remainder of the District.
DEVELOPMENT MANAGEMENT POLICIES		
110	Policy S4	Point 5 should be amended to make reference to managing the impacts upon transport generally and not just highways e.g. the impact upon bus service operation, access to a train station, impacts upon pedestrians and cyclists and similar impacts.
111	Policy D1	It would be helpful if wording was included in this, or a separate, policy to identify the need for waste minimisation during the construction and operational phases of development. This should be demonstrated by a waste audit.
112	Para 21.24	There should be earlier reference to the character of East Devon's archaeological heritage assets and the number recorded on the Devon Historic Environment Record (not Sites & Monuments Register).
113	Para 21.25	Should refer to the County Historic Environment Service.
114	Para 21.32-21.33	A Local List of Parks & Gardens is maintained by the Devon Gardens Trust and recorded on the Devon Historic Environment Record. These should be a material consideration in planning decisions.
115	Para 21.39 - 21.55	<p>The Local Plan includes a good section on Surface Water Run-off and SUDs, but it needs robust commentary to inform on Flood and Water Management Act 2010 and Devon County Council's emerging role as SUDs Approval Body. Current position and timescales:</p> <ul style="list-style-type: none"> ▪ There are major changes regarding sustainable drainage under the Flood and Water Management Act 2010 (FWMA). The FWMA encourages the use of sustainable drainage in new developments and re-developments. It does this by requiring drainage systems to be approved, against a set of National Standards, before construction work can commence. It will be the role of the newly established Sustainable Drainage Systems Approving Body (SAB) within Devon County Council, to approve, inspect, adopt and maintain sustainable drainage systems for new developments exceeding one property. ▪ The current proposal is for Schedule 3 (sustainable drainage) of the FWMA and its statutory instruments to be commenced on 1st October 2012. For the first 3 years (October 2012 to September 2015) the plan is for only major development (10+ dwelling houses) to require SAB approval. After September 2015 all development with drainage implications will require SAB approval. ▪ Using Sustainable Drainage Systems (SUDS) to manage surface water has a number of benefits, such as improving water quality and the local environment. However, they also provide an important function in reducing the risk of flooding of homes and businesses, as well as adjacent or downstream properties, as a result of heavy rainfall. It is therefore a key consideration to look at the surface water flood mapping available and consider what drainage measures should be used.
116	Policy EN16	Devon County Council would welcome the incorporation of this policy in relation to the interaction of waste sites and other development. However, the wording of the policy could be clarified by indicating whether <i>any</i> pollutants emanating from a waste site is unacceptable in terms of human health or whether this only relates to contaminated land. This wording could be helpfully clarified to identify whether any pollution emanating from a waste site is unacceptable if it would adversely affect health and safety.
117	Policy EN19	This policy could usefully identify that proposals for private sewage works will be supported if they make provision for the generation of energy on site.
118	Para 21.53	<p>Recommend text amended: Proposals for privately funded or public works to defend coastal land or property must be assessed in a holistic manner in order to identify and consider potential impacts that disruption to natural processes may cause and to ensure defence measures are <u>acceptable environmentally and</u> technically sound and sustainable in the long term.</p> <p>NB reference 70 should read: South Devon and Dorset Coastal <u>Advisory</u> Group.</p>
119	Policy E8	The wording which states that extensions to current employment sites will be acceptable provided that 'there will be no detrimental impact upon any nearby residential properties' is very strict and could result in any development being unacceptable in these areas.

		(1) TIAs no longer exist – should refer to Traffic Assessments.
120	Policy RE5	Recommend text amended: Planning permission will be granted for outdoor recreation facilities in the countryside <u>and on the coast</u> provided that the nature of the activities undertaken or the space requirements of the proposal require a countryside or coastal location and...
121	Para 21.114	This is subject to agreement of governing body/school sponsor
122	Policy TA2	The policy is supported in principle but would benefit from clarifying how this might be implemented. E.g. would it be developer funded, developer led, etc.
123	Para 21.127	Reference to the Wessex Coast to Coast Cycle Route is wrong name and out of date - this is now the Stop Line Way and is currently being implemented.
124	Policy TA 7	Last sentence of Point 1 should be amended: ...In the case of programmed schemes the planning permission will be subject to a condition delaying its implementation until the highways improvements have been carried out, <u>unless otherwise agreed with the Highways Authority</u> .
125	Para 21.138	It should be clarified that further public consultation on revised routes for the Dinan Way extension is yet to be undertaken and will take place once revised route options are prepared and the principle of the new link is established in the development plan.
126	Policy TA 8	Point 10 should refer to the B3184 (not B3174) and specific mention of the “footway and cycle route” should be deleted, to allow for general road improvements – for details see comments for Para. 7.54-7.57. Policy should also include the Axminster North–South relief road as a scheme to ensure its delivery is not compromised by development.
127	Policy LEX5	Should mention that the relocation of the bus depot facilities should be dependent upon the availability of a suitable alternative site.
128	Policy LSE1	This is also out of date - the second bullet in particular refers to the holiday village (long demolished) - the fourth bullet speaks of retail - Tesco has now been developed and opened. Text should include measures to retain and promote understanding of the historic environment. This could include contributions to the interpretation of the maritime archaeology of the Axe Estuary and Wetlands.
NEIGHBOURHOOD PLANNING		
129	Para 22.7	Devon County Council should also be involved this process given our role in meeting community needs, accessibility etc.