

**Climate Change, Environment and Transport**

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22<sup>nd</sup> January 2026

Dear Mr Freeman

**Consultation on the East Devon Local Plan 2020 to 2042 Second Regulation 19  
Publication Draft November 2025**

Thank you for the opportunity to comment on the second Regulation 19 publication draft of the East Devon Local Plan 2020-2042.

Overall, Devon County Council (DCC) views the Publication Draft Local Plan to be generally sound, legally compliant and to comply with the duty to cooperate.

The county council does however have a number of detailed comments to make on strategic issues relating to infrastructure provision, the second new community, transport and highways, education, minerals and waste planning, adult social care, flood risk, historic environment and landscape - these comments regarding the specific policies, paragraphs and site options are shown in the table in Appendix 1 below. In relation to Policy SP07 (Delivery of Infrastructure), the county council would also like to make associated comments on the November 2025 version of the Infrastructure Delivery Plan (IDP) which forms part of the evidence base. These comments on the IDP are shown in the table in Appendix 2 below.

It is considered that there are no outstanding matters relating to economy, children's services and public health and so the county council has no further comments to make on these issues.

**Infrastructure Provision**

Devon County Council largely welcomes the additional wording added to the supporting statement for Strategic Policy SP07 which highlights the need for significant education and transport infrastructure to support new development; proposes joint working to ensure timely and effective delivery of infrastructure; and specifies that s106 contributions will be used to fund education infrastructure where appropriate. DCC requests some minor changes to this supporting statement wording as indicated in Appendix 1 below, including to indicate that s106 contributions will also be used to fund transport and highways infrastructure where appropriate. As previously stated, DCC has a strong preference that county-related infrastructure is funded through Section 106 agreements, rather than through CIL, as this provides greater certainty to the county council that sufficient funding is available for delivery of the necessary infrastructure at the appropriate time, particularly for education and transport infrastructure.

The county council has worked closely with the district council to prepare the November 2025 version of the Infrastructure Delivery Plan (IDP). DCC requests that some minor wording changes are made to the wording of the IDP as shown in Appendix 2 of this response. DCC looks forward to continuing to work with East Devon District Council to make any further changes identified as necessary to the IDP for example to refine costing information in the light of new evidence.

### **Development strategy and second new community (Marlcombe)**

Devon County Council supports the spatial strategy contained within the 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. As part of this, the county council will continue to work with the district council on the planning for and delivery of Marlcombe new community. The county council largely supports the revised wording for Policy WS01 relating to Marlcombe, and has provided detailed comments on the policy relating to infrastructure, transport, education, waste planning and adult social care at Marlcombe as shown in Appendix 1 below. In particular, it should be noted that DCC cannot commit to forward fund the infrastructure required for the second new community during the plan period. In addition, DCC needs to ensure that any pooling mechanism ensures that funding will be guaranteed for statutory and/or essential infrastructure and provided to DCC to ensure the timely delivery of this infrastructure. It may be appropriate for some infrastructure such as education and transport not to be included in a pooling mechanism.

### **Highways and Transport (including public transport)**

Devon County Council is responding to this consultation as both the Local Transport Authority (LTA) and Local Highway Authority (LHA). It should be noted that DCC and the Devon and Torbay County Combined Authority (DTCCA) are concurrently fulfilling the LTA role. It is expected that from 1st April 2026, the LTA role will be undertaken by the DTCCA and any participation prior to this date relevant to the LTA should be assumed to transfer to DTCCA. Both authorities will be involved in the EDDC Local Plan process from 1st April 2026, fulfilling the separate LTA and LHA functions.

DCC is supportive of the spatial strategy and policies relating to sustainable transport and communications. Together these should help maximise the uptake of sustainable transport modes and reduce total demand for travel by ensuring employment, services and facilities are co-located with residential developments, and enabling residents to work and shop from home.

DCC welcomes the inclusion of transport infrastructure in the list of requirements associated with development proposals at Marlcombe, and the focus on active travel and public transport enhancements within the Marlcombe Transport Vision. DCC will continue working with the district council and National Highways to further develop these proposals.

DCC also welcomes the inclusion of the Otter Trail and the Beer to Axminster and Uplyme cycle route in the list of strategic cycle network schemes to be protected from development, and the provision of additional detail regarding requirements for electric vehicle charging.

DCC recommends that changes are made to the wording of policies SD01, SD17 and SD18, to ensure coordinated approaches between neighbouring allocations and to clarify requirements for localised improvements to enhance sustainable travel modes. Additionally, DCC recommends that the list of measures being considered to mitigate the impacts of traffic on the Pebblebed Heaths as specified in Policy PB04 is updated to match the shortlist detailed in *Mitigation of Air Quality Impacts in East Devon: Mitigation Strategy* (Ricardo AEA Ltd, 6th November 2025, Local Plan library document ENV-034) thereby removing some longlisted options which DCC does not consider to be feasible or appropriate to the local context.

### **Local Education Provision (including early years)**

DCC welcomes the inclusion of additional wording in the supporting statement (Policy SP07) related to education and a new section within Policy WS01 specifically for education as this highlights the critical nature of additional education infrastructure in supporting new housing development. DCC also supports the increase in land for education infrastructure at the new community and the clear emphasis on the importance of timely delivery of education infrastructure at Marlcombe.

DCC requests that key education infrastructure required to serve planned development which has been included in the IDP is also referred to within the strategic policy it predominantly relates to, in particular policies SD02, SD03 and SD04. For example, Policy SD02 should identify the need for additional primary and secondary education infrastructure in Axminster and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan.

Devon County Council would like to note that additional SEND education provision will be provided through special school places and places within mainstream education settings. Resource bases, for example, provide increasingly specialist provision and enable children to stay within mainstream education settings whilst their individual needs are met. This reflects the current national focus on more inclusive mainstream schools to support pupils with SEND within their local community where possible. Plans to support pupils with SEND could change over the plan period as new Government policy emerges. The mechanisms for funding and delivery of SEND education provision will be required to adapt to reflect this.

### **Minerals and Waste Planning**

DCC welcomes the wording changes to Policy WS01 to support the management of waste capacity at Hill Barton. DCC requests that Policy OL07 is amended to ensure that the policy remains up to date.

The county council removes its objection to the allocation of Exmo\_20 as it is considered that the policy wording has been amended to identify the Mineral Safeguarding Area and Mineral Consultation Area in the northern part of the site. The revised Policy SD01 wording demonstrates the tests that need to be met to allow development within the Mineral Safeguarding Area. DCC requests the paragraph at the bottom of page 86 in Policy SD01 is amended to provide greater clarity, as shown in Appendix 1 of this letter below.

### **Adult Social Care**

DCC welcomes the inclusion of a 70 unit Extra Care Housing (ECH) scheme, C2 residential care home and specialist housing to support younger vulnerable people at Marlcombe in Policy WS01. It is noted that the Infrastructure Delivery Plan aligns with the policy and also references a 70 unit ECH scheme and C2 residential care home with dementia provision, which the county council supports.

### **Gypsy and Traveller Provision**

It is the role of the local planning authority to plan to meet the needs of gypsies, travellers, and travelling showpeople across East Devon. It is noted that the plan is supported by a needs assessment setting out a requirement for 32 pitches between 2023 and 2045, of which 29 pitches are required during the local plan period. Devon County Council accepts the reasoning for this reduction in local plan need to reflect a shorter time period for delivery.

The plan includes proposals for the allocation and delivery of a total of 30 permanent pitches (within the second new community and the Cranbrook expansion areas). DCC considers the proposals set out in the plan regarding gypsy and traveller provision to be sufficient based on the assessment as published, with provision in appropriate locations near to local services and transport options. The delivery of the 30 pitches at Cranbrook and Marlcombe is considered to be achievable in principle, and therefore, the county council has no objection regarding gypsy and traveller provision. Should a review of the needs assessment be required, the county council would expect provision to be made in the plan for the full assessed need.

### **Historic Environment**

DCC removes its objection to site allocations Clge\_25a, Axmi\_02 and Axmi\_08 as further assessments have been undertaken and it is considered that any mitigation required can be addressed as part of future planning applications. The county council maintains its objection to site allocations Axmi\_09 and Seat\_13a as further archaeological information is still required to determine the acceptability of allocating these two sites.

DCC requests that the wording proposed to be removed from Policy HE05 is retained, as detailed in Appendix 1 below.

### **Flood Risk Management**

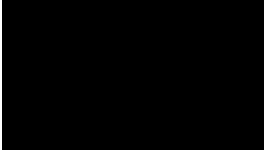
DCC has previously provided comments relating to flood risk including detailed comments relating to proposed site allocations as part of the local plan process. DCC has supported the district council and provided all relevant data and modelling held by DCC's Flood Risk Team for the strategic flood risk assessment work which helped guide allocations. Overall, it is considered that detailed site assessments and design considerations relating to surface water drainage can be addressed at planning application stage.

### **Landscape**

It is noted that landscape matters in relation to the local plan are for with the consideration of the district council. The county council would like to make a few suggestions as shown in Appendix 1 that may be useful for the district council to consider.

We trust these comments are useful and we look forward to continuing our work with you as you progress your local plan. If you have any queries, please do not hesitate in contacting me.

Yours sincerely,



**Sarah Ratnage**  
**Planning Manager**

**Appendix 1 – Devon County Council (DCC) consultation comments on the East Devon Local Plan 2020-2042 Second Regulation 19 Publication Draft (November 2025)**

| DCC Issue                  | Paragraph/Policy/Site Reference                               | DCC Comments  |
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| Infrastructure             | Policy SP07 – Delivery of Infrastructure<br>Page 44           | <p>DCC supports Strategic Policy SP07. However, the county council wishes to make some detailed comments on the November 2025 version of the Infrastructure Delivery Plan (IDP). These comments which include requested changes to the wording of the IDP are shown below in the table in Appendix 2 of this letter.</p> <p>DCC will continue to work with the district council to make any further changes identified as necessary to the IDP for example to refine costing information in the light of new evidence.</p>                  |
| Infrastructure (Transport) | Policy SP07 – supporting statement paragraph 3.43b<br>Page 46 | DCC welcomes the recognition that a significant amount of transport infrastructure will be required alongside housing and employment growth, and that development will be expected to contribute to the delivery of said infrastructure. DCC will continue to work with the district council to ensure development proposals incorporate and/or make appropriate contributions to the delivery of local and strategic transport infrastructure enhancements.  |
| Infrastructure (Education) | Policy SP07 – supporting statement paragraph 3.44<br>Page 46  | This paragraph includes some duplicated wording. This should be amended for clarity to the following wording: “Additional homes create the need for additional education provision including <b>for early years and childcare, primary</b> , secondary, post 16 and pupils with special educational needs and disabilities. There are also implications for home to school transport. This education impact of development must be fully mitigated by financial contributions in order for development to be acceptable in planning terms.” |
| Infrastructure             | Policy SP07 – supporting statement paragraph 3.44b<br>Page 46 | DCC welcomes this new supporting statement paragraph. DCC has a strong preference that county-related infrastructure is funded through Section 106 agreements as this provides greater certainty that sufficient funding is available for delivery of the necessary infrastructure at the   |

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|   |  | <p>appropriate time. This is particularly important for the provision of education and transport infrastructure.</p> <p>The Devon and Torbay Combined County Authority (DTCCA) will take on the role of Local Transport Authority from 1 April 2026, but DCC will continue to be the Local Highway Authority, meaning EDDC may need to work with both the DTCCA and DCC in relation to infrastructure requirements for new development. DCC therefore requests that a minor revision be made to the first sentence of paragraph 3.44b to state: “The Council will work with relevant infrastructure and service providers, including education, health, police, <b>highway</b> and transport authorities, to ensure timely and effective delivery of infrastructure.”</p> <p>DCC also requests that additional wording to include mention of transport and highways is added to the last sentence of paragraph 3.44b to state, “Where appropriate, planning obligations (s106) will be used to secure the provision and ongoing maintenance of infrastructure, particularly for education, <b>transport, highways</b> and health facilities.”</p> |
| Infrastructure (Education)              | Policy SP07 – supporting statement paragraph 3.45<br>Page 46 | DCC welcomes the inclusion of this additional wording to highlight the critical nature of additional education infrastructure to support new housing development.   |
| Infrastructure (Transport and Highways) | Policy SP08<br>Page 47                                       | DCC welcomes the inclusion of additional wording to specify that transport infrastructure within development parcels should align with infrastructure on neighbouring parcels/sites, to ensure there are continuous and attractive active travel and vehicular links from development sites to neighbouring areas and key destinations.   |
| Adult Social Care                       | Policy WS01 – New Homes part B and part C<br>Page 53         | DCC welcomes the requirement to provide a 70 unit Extra Care Housing scheme, C2 residential care home and specialist housing to support younger vulnerable people in the community.   |
| Gypsy and Traveller Provision           | Policy WS01 – Gypsy and Traveller Provision<br>Page 54       | DCC welcomes the provision of 15 permanent pitches at Marcombe within the plan period and the proposed provision of a further 15 pitches beyond 2042.   |

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| Infrastructure             | Policy WS01 – Social, Cultural, Leisure, Health and Community Facilities<br>Page 55 | DCC supports the requirement for s106 obligations to secure the delivery of physical infrastructure and revenue contributions towards the delivery of services to support the growth of the community and the health and wellbeing of its residents.   |
| Education                  | Policy WS01 – Education Facilities<br>Page 55                                       | <p>DCC welcomes that Education is now identified in its own section within Policy WS01 as the provision of school places is a statutory requirement. The wording states that new education facilities at Marlcombe will meet the needs of all age groups that will live in the town. Please note that, whilst the SEND provision is of an appropriate size and scale to development, pupils will attend from a wider area due to the specific nature of the provision. Similarly, pupils with SEND living in Marlcombe may be required to travel to access the appropriate education facility to meet their specific needs.</p> <p>DCC supports the increase in land for education infrastructure and this is sufficient to support development on land allocated in the local plan for 8,000 homes based on the current Department for Education Building Bulletin 103 and Building Bulletin 104 site area guidance. DCC also welcomes the emphasis on the importance of timely delivery of education infrastructure at Marlcombe. Related to this, DCC requests the final line of the education section in Policy WS01 is amended to include mention of the need for a forward funding solution as this underpins timely delivery as follows: “The precise timing and mechanism for the <b>forward funding</b> and delivery of the schools is to be established through the phasing and infrastructure delivery strategies.”</p> |
| Infrastructure (Education) | Policy WS01 – Wider Infrastructure Part B<br>Page 56                                | DCC requests that Wider Infrastructure item B is deleted as this requirement is included above in the Education Facilities section on page 55.   |
| Infrastructure             | Policy WS01 – Wider Infrastructure<br>Pages 56 - 58                                 | DCC welcomes the inclusion of transport infrastructure in the list of wider infrastructure which will need to come forward with development proposals at Marlcombe.  |

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|                |   | <p>It should be noted that Devon County Council cannot commit to forward fund the infrastructure requirements of the second new community during the plan period.</p> <p>DCC notes that development proposals will be expected to contribute towards infrastructure on a pooled basis. At this stage it is unclear what form the pooling mechanism would take as part of the intended approach to achieve an overall fair and consistent apportionment of infrastructure costs. Any pooling mechanism will need to ensure that sufficient funding will be guaranteed for statutory and/or essential infrastructure and provided to DCC in a timely manner to ensure the delivery of this infrastructure to mitigate the impacts of development and support the new community. It may be appropriate for some infrastructure such as education and transport not to be included in a pooling mechanism, beyond that which DCC may use to combine contributions from multiple planning applications/developers.</p> <p>DCC welcomes the provision for a review mechanism for planning obligations. This will ensure that the full cost of infrastructure is secured, which will support delivery of infrastructure throughout the development of Marcombe.</p> |
| Waste Planning | Policy WS01 – Waste Consultation Zone<br>Page 59                        | DCC welcomes the new Waste Consultation Zone section in Policy WS01 which makes reference to the Hill Barton Waste Consultation Zone. The wording of this new section has been discussed and agreed with DCC. It is considered that the new wording supports Policy W10 of the Devon Waste Plan and the protection of waste management capacity at Hill Barton.  |
| Transport      | Policy WS01 – supporting statement<br>paragraphs 4.8b – 4.8d<br>Page 61 | DCC welcomes the focus on active travel and public transport enhancements within the Marcombe Transport Vision, and will continue working with the district council and National Highways to develop proposals for active travel links, bus service and infrastructure   |

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|                       |  | enhancements and improvements to key junctions on the local and strategic road networks.  |
| Waste Planning        | Policy WS01 – supporting statement paragraph 4.8e<br>Page 62           | DCC welcomes the new wording in paragraph 4.8e which provides clarification of the purpose of the Waste Consultation Zone at Hill Barton.   |
| Flood Risk Management | Policy WS08 – supporting statement paragraph 4.34b<br>Page 72          | DCC requests that reference to “not fluvial risk” should be removed from the end of the paragraph wording as there is an ordinary watercourse and this, while mapped as a surface water risk, technically poses a fluvial risk.   |
| Transport             | Policy WS10 – supporting statement paragraph 4.45b<br>Page 78          | DCC welcomes the reference to the Clyst Road and Newcourt Road Transportation Access Strategy, and will work with the district council to help ensure development proposals are aligned with this strategy.   |
| Historic Environment  | Policy WS15 – Employment land at Darts Farm<br>Page 81                 | The county council removes its objection to the allocation of Clge_25a as further archaeological work has been undertaken. DCC would advise that any impact upon any heritage assets with archaeological interest can be mitigated by a programme of archaeological work secured either (i) by the submission of a written scheme of investigation submitted in support of any future planning application or (ii) by the application of the two usual archaeological conditions to any consent that may be granted. The County Historic Environment Team can provide detailed advice on the scope of the programme of works. |
| Transport             | Policy SD01 – Exmouth and its development allocations<br>Pages 84 – 89 | <p><u>Comments relating to Exmo_23 and Lymp_07:</u></p> <p>To ensure a coordinated and comprehensive approach, DCC recommends that the Exmo_23 and Lymp_07 allocations could be covered by a single section (similar to the approach for Exmo_08 and Exmo_16), reading as follows:</p> <p><b>“The land south of Courtlands Lane (within the Exmo_23 allocation) will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes.</b></p>   |

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|  |  | <p><b>The site at Courtlands Cross north of Courtlands Lane (within the Lymp_07 allocation)</b> will accommodate around 100 new homes and 0.4 hectares of employment land. The field to the west of the housing allocation land is allocated for delivery of sports pitch uses and associated low key ancillary facilities as part of a viable package of planning obligations. Built development at this site, located on the two south-easterly fields, will need to be particularly sensitively designed to avoid potential for adverse impact on nearby heritage assets and to avoid adverse landscape impacts.</p> <p><b>These allocations will need to come forward on the basis of an agreed coordinated access strategy for both Exmo_23 and Lymp_07 allocations that clearly demonstrates how sustainable transport will be designed and implemented.</b> Particular importance is attached to retention of the East Devon Way footpath, in a spacious corridor, across the <b>Lymp_07</b> site in a north-south direction. There should also be safe off-street pedestrian and cycle access that provides for east-west movement through the area for existing and future users linking into adjacent areas such as Lympstone Manor. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. <b>Through this coordinated access strategy, particular account will need to be taken of providing active travel links to the wider network and towards the town centre with alterations to vehicular access along Courtlands Lane.”</b></p> <p><u>Comments relating to Lymp_14 and Exmo_04a:</u></p> <p>DCC also recommends that the policy text relating to the Lymp_14 and Exm_04a allocations should identify the need for localised improvements to enhance sustainable travel modes with wording as follows:</p> |
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|  |  | <p>“Land at Coles Field Hulham Road (Lymp_14)</p> <p>This site is allocated for around 59 new homes. Biodiversity interest at and close to this site will demand particular sensitivity in respect of site design and implementation to avoid damage and delivery of onsite habitats should reflect and link into adjoining priority habitats. This site will need to provide pedestrian and cycle access into the adjoining site Exmo_04a. <b>The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.</b></p> <p>Land at Marley Drive (Exmo_04a)</p> <p>This site is allocated for around 50 new homes. The site supports a number of significant mature trees with areas of biodiversity value within the site and to its boundaries which will demand particular sensitivity in respect of site design and implementation to avoid damage and delivery of onsite habitats should reflect and link into adjoining priority habitats. There will need to be pedestrian and cycle access through this site into Site Lymp_14 and thereafter on into Goodmores Farm. <b>The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.”</b></p> <p><u>Comments relating to Exmo_18:</u></p> <p>DCC also recommends that the policy text relating to the Exmo_18 allocation should identify the need for active travel and bus enhancements in the event of a secondary access being provided from Salterton Road, and the need for the design of this access to give consideration to potential changes associated with the Exmo_17 allocation opposite, with amended wording as follows:</p> |
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|  |  | <p>“Any secondary access from Salterton Road should be carefully designed and screened to minimise any impacts on the setting of the National Landscape. <b>In the event of such an access being provided, development should also provide an extension of the existing shared-use path on the northern side of Salterton Road (to the junction with the secondary access), and new/improved bus stops on Salterton Road. Any secondary access should be designed giving consideration to potential changes to road layouts associated with the Exmo_17 allocation on the opposite side of Salterton Road.</b> Existing hedges to the southern and eastern site boundaries should be reinforced and appropriately managed and additional trees planted.”</p> <p><u>Comments relating to Exmo_17:</u></p> <p>DCC recommends the correction of a minor typographical error within the policy text relating to the Exmo_17 allocation as follows:</p> <p>“The development will need to be supported by a new developer provided SANGs, <b>brought</b> forward and implemented as part of the overall scheme on the allocated or on nearby land.”</p> <p>DCC recommends a further minor change to include Castle Lane in the list of locations to be served by pedestrian and cycle connections from the Exmo_17 allocation as follows:</p> <p>“The cycle path bisecting the site will need to be retained and enhanced within an attractive corridor with pedestrian and cycle access routes provided throughout the development. New circular pedestrian and cycle routes should be provided within the site, together with connections to the wider network, including <b>Castle Lane</b>, the South West Coast Path and to local services in Littleham and to the Liverton Business Park.”</p> |
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| <p>Historic Environment</p> | <p>Policy SD01 – Exmouth and its development allocations<br/>Page 86</p>       | <p>It is noted that the policy wording for Exmo_20 now states the need for a detailed heritage assessment to be submitted as part of a planning application. DCC considers that the proposed allocation occupies a large area within a landscape where minimal formal archaeological work has been undertaken and contains evidence of prehistoric activity in the form of findspots of flint tools and funerary monuments on the higher ground to the north. In addition, this proposed allocation area lies in proximity to the church of St John- in-the-Wilderness, originally the 15th century parish church and protected as a grade II* listed building. Given the archaeological potential of the proposed development site, DCC requests that any proposals for development should be informed and supported by an appropriate level of heritage information. This should take the form of the results of a geophysical survey and field evaluation of the areas affected by the proposed development. To make the need for archaeological assessment clear, and align with the requirements set out in other site allocation policies, DCC requests the policy wording is amended to include “A detailed heritage <b>and archaeological</b> assessment...”.</p> |
| <p>Minerals Planning</p>    | <p>Policy SD01 – Exmouth and its development allocations<br/>Pages 86 - 87</p> | <p>DCC largely welcomes the reference to the Mineral Safeguarding Area and Mineral Consultation Area in the Exmo_20 wording and removes its objection to the allocation. DCC requests that the wording and formatting of the following paragraph is amended (contained at the bottom of page 86) to include a bullet point list and minor wording change to clearly demonstrate the tests that need to be met in order to allow for development should a Mineral Resource Assessment show that the mineral resource is of value. DCC requests the paragraph is amended to read:</p> <p>“Planning permission for development or use of the land (including for open space and recreational uses) in the Mineral Safeguarding Area will not be permitted unless the development demonstrates through a robust Mineral Resource Assessment, that the mineral resource is not of current</p>  |

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|           |  | <p>or potential economic value. Should a Mineral Resource Assessment show that the mineral resource is of current or potential economic value, <b>the development must demonstrate:</b></p> <ul style="list-style-type: none"> <li>• <b>prior extraction of the mineral resource in advance of development will be undertaken; or</b></li> <li>• <b>it is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction or operation within the timescale that the mineral resource is likely to be needed.”</b></li> </ul>   |
| Education | Policy SD02 – Axminster and its development allocations<br>Page 90       | <p>Policy SD02 should identify the need for additional primary and secondary education infrastructure in Axminster and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan. DCC requests that the following wording is added to Policy SD02:</p> <p><b>“Expanded primary and secondary school provision in Axminster is required to support further development in Axminster and the wider aspirations of the plan.”</b></p>   |
| Transport | Policy SD02 – Axminster and its development allocations<br>Pages 90 - 92 | <p>To ensure the possible future relief road is protected from development, DCC requests that the policy text relating to the Axmi_22 allocation be amended to read:</p> <p><b>“This site is allocated for 100 dwellings. The site layout should make provision for a suitable access road to facilitate the development of site GH/ED/80 to the north and also be designed and built to a standard suitable for use and include land safeguarded at the Lyme Road intersection as part of a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge. Pedestrian/cycle access should be off Loup Court, with Public Rights of Way enhancements.”</b></p> |

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|                      |  | <p>DCC also recommends the correction of minor typographical errors within the policy text relating to the Axmi_02, Axmi_08 and Axmi_09 allocations:</p> <p>“The site is located close to the <b>Strategic Road Network (SRN)</b> and development should avoid adverse impacts on road safety on the <b>SRN.</b>”</p>   |
| Historic Environment | <p>Policy SD02 – Axminster and its development allocations<br/>Pages 91 - 92</p> | <p>DCC notes the removal of allocation Axmi_01a.</p> <p>The county council removes its objection to allocations Axmi_02 and Axmi_08 subject to archaeological work and design/layout approval that does not/minimises the effect upon the setting of the scheduled monument.</p> <p>The county council maintains its objection to Axmi_09 as archaeological work is still ongoing and it is advised this site should not be allocated until the results of the archaeological investigations are available for consideration by the County Historic Environment Team.</p> |
| Education            | <p>Policy SD03 – Honiton and its development allocations<br/>Page 95</p>         | <p>Policy SD03 should reflect the need for improved secondary education facilities in Honiton and recognise this as a requirement to support the policy and wider aspirations of the plan. DCC requests that the following wording is added to Policy SD03:</p> <p><b>“Improved secondary school facilities in Honiton are required to support further development in Honiton and the wider aspirations of the plan.”</b></p>   |
| Education            | <p>Policy SD04 – Ottery St Mary and its development allocations<br/>Page 98</p>  | <p>Policy SD04 should reflect the need for additional primary and improved secondary education provision in Ottery St Mary and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan. DCC requests that the following wording is added to Policy SD04:</p>  |

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|                      |  | <p><b>“In addition to the new primary school with provision for early years for Ottery St Mary, improved secondary school facilities are required to support further development in Ottery St Mary and the wider aspirations of the plan.”</b></p>  |
| Historic Environment | Policy SD05 – Seaton and its development allocations<br>Page 101 | Devon County Council maintains its objection to allocation Seat_13a due to insufficient information on the presence and significance of any heritage assets with archaeological interest associated with the nationally important and scheduled monument adjacent and to the south.   |
| Transport            | Policy SD09 – Development allocations at Colyton<br>Page 106     | DCC welcomes the greater clarity provided by the revised wording relating to footway improvements along the frontage of the Coly_06a allocation.  |
| Transport            | Policy SD17 – Development allocations at Exton<br>Page 112       | <p>To ensure a coordinated approach, DCC requests that an additional paragraph be added to the text relating to this policy as follows:</p> <p><b>“Development will need to come forward on the basis of an agreed coordinated access strategy for both allocations at Exton that maximises the opportunities and minimises the potential adverse impacts of development in relation to transport.”</b></p> |
| Transport            | Policy SD18 – Development allocations at Feniton<br>Page 113     | <p>To clarify requirements, DCC requests that an additional paragraph be added to the text relating to the Feni_05 and Feni_08 allocations as follows:</p> <p><b>“The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.”</b></p>  |
| Transport            | Policy SD26 – Development allocation at Sidbury<br>Page 120      | DCC welcomes the greater clarity provided by the revised wording relating to delivery of the Sidbury to Sidford/Sidmouth cycle route within the Sidm_34 allocation.   |
| Landscape            | Policy CC03 – supporting paragraph 6.6<br>Page 129               | Whilst landscape matters are for the consideration of the district council, DCC suggests that it could be useful to refer to recently updated guidance: <a href="#">Devon Landscape Policy Group advice note 2:</a>   |

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|                       |   | <a href="#">Accommodating wind and solar PV developments in Devon's Landscape - Planning</a> . This guidance promotes sensitive siting and design of these development types aimed at minimising harm to the distinctive character and special qualities of Devon's landscape.  |
| Flood Risk Management | Policy AR01 – Flooding<br>Page 137                                  | DCC supports the proposed policy wording changes to point F.  |
| Adult Social Care     | Policy HN03 – Housing to meet the needs of older people<br>Page 153 | DCC supports the removal of “affordable” in the first paragraph given inclusion of a requirement for specialist housing for older people to provide affordable housing in Policy HN02.  |
| Adult Social Care     | Policy HN04 – Accessible and adaptable housing<br>Page 155          | DCC notes that the M4(2) requirements have decreased from 100% to 50% due to a reduction of need identified in the updated Housing Needs Assessment (dated October 2025). The county council notes the Building Regulation consultation 2022 that indicated the Government is likely to mandate M4(2) as a minimum for all new homes. Therefore, it is considered that changes to the M4(2) requirements will be progressed under the Building Regulations.   |
| Gypsy and Travellers  | Policy HN09 – supporting paragraph 8.41<br>Page 167                 | <p>It is noted that the plan is supported by a needs assessment setting out a requirement for 32 pitches between 2023 and 2045, of which 29 pitches are required during the local plan period. Devon County Council accepts the reasoning for this reduction in local plan need to reflect a shorter time period for delivery.</p> <p>DCC welcomes proposals within the local plan for the allocation and delivery of a total of 30 permanent pitches within the plan period (within Marlcombe and the Cranbrook expansion areas). DCC considers the proposals set out in the plan regarding gypsy and traveller provision to be sufficient based on the assessment as published, with provision in appropriate locations near to local services and transport options. The delivery of the 30 pitches at Cranbrook and Marlcombe is considered to be achievable in principle, and therefore, the county council has no objection regarding gypsy and traveller provision. Should a review of the</p> |

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|           |  | needs assessment be required, the county council would expect provision to be made in the plan for the full assessed need.   |
| Transport | Policy TR02 – Protecting transport sites and routes<br>Page 211                            | DCC welcomes the inclusion of the Otter Trail and the Beer to Axminster and Uplyme cycle route in the list of strategic cycle network schemes to be protected from other development which would preclude their delivery.  |
| Transport | Policy TR04 – Parking standards and electric vehicle charging provision<br>Pages 215 – 216 | DCC welcomes the additional wording inserted in relation to electric vehicle charging provision, which (in addition to policies promoting active travel, public transport and improvements to digital connectivity) should help ensure development supports the decarbonisation of transport, in line with the Devon Carbon Plan and Devon Electric Vehicle Charging Strategy.   |
| Landscape | Policy OL01 – Landscape features<br>Page 225   | Whilst landscape matters are for the consideration of the district council, it is suggested that the penultimate paragraph in the policy wording refers to “Landscape <b>Character</b> Assessments” rather than “Landscape Characterisation Assessments” to remain consistent with terminology within DCC’s landscape evidence base and Natural England guidance.  |
| Landscape | Policy OL01 – supporting paragraph 12.3<br>Page 225  | <p>DCC has two layers of data that comprise the shared Devon-wide evidence base called Devon’s Landscape Character Assessment. It comprises generic Landscape Character Types that can occur anywhere in Devon, and ‘Devon Character Areas’ that are geographically unique and highlight what is distinctive and gives a ‘sense of place’ to a particular area. The ‘district Landscape Characterisation Assessment’ referred to in paragraph 12.3 covers only Landscape Character Types. To allow both layers to be used as evidence base for the local plan it is suggested that paragraph 12.3 refers to both Landscape Character Types and Devon Character Areas, and that a link is embedded to the DCC landscape webpage. Again, DCC suggests the word “Characterisation” is changed to “<b>Character</b>”.</p> <p>To reflect these changes, DCC suggests the following amended wording for the last sentence of paragraph 12.3:</p> |

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|           |   | <p>“All development in the countryside should consider the <b>Devon Landscape Character Assessment (footnote to be inserted)</b> and district Landscape <b>Character</b> Assessment (LCA) and the Council’s Tree Strategy to maintain and enhance local distinctiveness and landscape character.”</p> <p>Footnote to be inserted: <a href="#">Devon's landscape character assessment (DLCA) - Planning</a></p>  |
| Landscape | Policy OL01 – supporting paragraph 12.5<br>Page 226 | <p>DCC suggests amending the wording of paragraph 12.5 to align with Guidelines for Landscape Visual Impact Assessment 3rd Edition as follows:</p> <p>“Proposals <b>that raise concerns about adverse effects on the character of an area and/or visual amenity</b> should be <b>subject to a</b> proportionate Landscape <b>and Visual</b> Appraisal, conducted in accordance with the Guidelines for Landscape and Visual Impact Assessment and <b>related technical guidance published by the Landscape Institute</b>. The level of detail required will depend upon the <b>scale and type of development proposed, the sensitivity of the landscape to such change, and the likely significance of effects</b>. If a full Environmental Impact Assessment (EIA) is required, a Landscape and Visual Impact Assessment (LVIA) by a <b>Chartered Member of the Landscape Institute</b> will be necessary. <b>Both types of appraisals should be objective and unbiased assessments that identify and assess the effects of a proposal on the landscape and visual resource and include measures to mitigate adverse effects. Carrying out such appraisals early in the design process is encouraged in order to inform a high standard of mitigation and enhancement design</b>”.</p> |
| Landscape | OL02 – National Landscapes<br>Page 227              | <p>It is suggested that point A where it states “but affecting its setting or appearance” is amended to read “but affecting its <b>natural beauty</b>,</p>  |

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|                |   | <p><b>special qualities and key characteristics</b>". It is considered that using this terminology allows linkage to the National Landscape Management Plans and associated Landscape Character Assessments.</p>  |
| Waste Planning | Policy OL07 – Contaminated land<br>Page 234   | <p>To ensure that Policy OL07 remains up to date, DCC requests that the policy wording is amended to state:</p> <p>“Development on or in close proximity to active, permitted or former waste management sites will only be permitted where it can be demonstrated that there will be no harm to future occupiers of the site from leachate or landfill gas or other waste arising in consultation with Devon County Council as the waste planning authority and in accordance with Policy W10 (Protection of Waste Management Capacity) of the Devon Waste Plan, <b>or equivalent policy within a subsequent or amended plan</b>”.</p>   |
| Transport      | Policy PB04 - Habitat Regulations Assessment (HRA) and mitigation strategies<br>Pages 249 – 257 | <p>In principle, DCC is supportive of measures to reduce the impacts of traffic on designated sites, including through promoting the uptake of electric vehicles and enabling modal shift from cars to active travel and public transport. However, DCC does not consider the following measures included in the 'long-list' of potential mitigation options on page 256 for the Pebblebed Heaths to be feasible:</p> <ul style="list-style-type: none"> <li>• Traffic re-direction away from the Pebblebed Heaths and sensitive locations</li> <li>• Low Emission Zones and Ultra Low Emission Zones</li> <li>• Providing additional road signage</li> </ul> <p>This is due to the lack of suitable alternative routes to the main roads through the Pebblebed Heaths (specifically the A3052, B3179 and B3180), meaning that traffic re-direction/providing additional road signage is unlikely to be appropriate, and meaning that Low Emission Zones and Ultra Low Emission Zones would likely have a disproportionate adverse impact on road users, particularly those in lower income groups.</p> |

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|  |  | <p>Additionally, it is unclear that speed reductions would have a significant beneficial impact on emissions, given that existing average vehicular speeds are (according to DCC data) close to optimum in relation to cruise emissions.</p> <p>Furthermore, it is noted that the abovementioned long-listed options were not included in the subsequent short list of mitigation options detailed in <i>Mitigation of Air Quality Impacts in East Devon: Mitigation Strategy</i> (Ricardo AEA Ltd, 6 November 2025): <a href="#">Ricardo report template</a>.</p> <p>It is therefore recommended that the local plan text is updated to match the Ricardo report short list, with a further minor change to reflect that EVs do not generate <b>exhaust</b> emissions (but the generation of electricity to power EVs may generate emissions, and EVs produce particulate matter from tyres and brakes):</p> <p>“An initial overarching mitigation strategy has been produced and this is to be followed by a more detailed Pebblebed Heaths Air Quality Mitigation Strategy. The detailed mitigation strategy will establish a strategic approach to ensuring mitigation delivery. This strategy will include costed projects and schemes that can be demonstrated to be deliverable. Such projects will ensure that the local plan can be implemented and that individual planning applications can meet Habitat Regulation requirements and proceed on the basis of drawing on planned mitigation and capacity and timing for delivery as set out in this strategy.</p> <p>A ‘<b>short list</b>’ of potential mitigation options will be refined and costed and where appropriate included in the detailed strategy, to potentially include:</p> <ul style="list-style-type: none"> <li>- <b>Electric Vehicle infrastructure</b></li> <li>- <b>Slurry stores</b></li> </ul> |
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|                      |  | <ul style="list-style-type: none"> <li>- <b>Replacing refuse collection vehicles (RCVs) with electric vehicles (EVs)</b></li> <li>- <b>Replacing dog waste vehicles with EVs</b></li> <li>- <b>Land management</b></li> <li>- <b>Local Plan Air Quality Development policy</b></li> </ul> <p>Monies, drawn from developer contributions, will secure mitigation delivery.</p> <p>A key element of mitigation will be proactively seeking an accelerated rate of uptake of electric vehicles, specifically amongst those moving into new homes to be built under local plan policy. Electric vehicles do not generate <b>exhaust</b> emissions and as such greater levels of use with a corresponding decrease in internal combustion engine vehicles will diminish over time the need for other mitigation.”</p> |
| Historic Environment | Policy HE05 – Historic Landscapes, Parks and Gardens<br>Page 293 | The county council requests that the paragraph proposed to be removed in this policy is retained. Historic Landscapes, Parks and Gardens are heritage assets and those on the register should be considered as designated heritage assets.   |

Appendix 2 – DCC Second Regulation 19 consultation comments on the East Devon Local Plan 2020-2042 Infrastructure Delivery Plan November 2025

| Education projects |          |           |   |   |                                |  |                           |  | DCC Second Regulation 19 comments 22 January 2026  |
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| Reference          | Priority | Location  | Project   | Cost  | Potential Funding Sources      | Timescale                                | Delivery Organisation (s) | Notes/ additional justification  |  |
| EDU-8              | 1        | Devon     | New SEND education infrastructure   | £2,346,552  | Development Contributions, DCC | 2025 - 2042                              | Devon County Council      | This accounts for all sites of more than 150 dwellings. This does not include the new community. (WS01) which will include SEND provision on-site as part of the all through campus. | DCC requests the following wording is added to the end of the existing wording in the Notes / justification section to reflect the current national focus on more inclusive mainstream schools to support pupils with SEND: <b>“SEND provision may be provided at mainstream education settings in some cases and plans to support pupils with SEND could change over the plan period as Government policy emerges.”</b> |
| EDU-9              | 1        | Marlcombe | All through campus on 17.3ha of safeguarded land: 630 primary school places / early years provision for 0-5yrs / 1500 | Early Years: £630,000<br>Primary: £15,814,890<br>Secondary: £43,800,000<br>Post-16: £17,520,000 | Development Contributions, DCC | 2029 – 2042 and beyond (phased delivery) | Devon County Council      | This education provision will meet the needs of Marlcombe, the second new community (WS01) and   | DCC supports the inclusion of the education campus at Marlcombe in the IDP and recognises it is clearly identified that this will serve development beyond the plan period.  |

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|  |  |  | secondary school places (footprinted for 1900 places)/ 80 place special education provision / Post 16 provision | SEND: £9,344,160 (Total: £87,109,050) |  |  |  | the wider aspiration of the plan during the plan period (2020 – 2042). 17.3ha required to facilitate future expansion of the campus beyond the plan period, particularly to meet secondary education requirements which will require additional capital funding beyond the figures included here. Costs are likely to increase to reflect abnormal costs due to site size. Included on the basis that will provide for area wider than just new community. | The meaning in the Notes / justification section is however unclear and includes repetition. DCC requests the following wording for the Notes column instead for clarity and accuracy: <b>“17.3ha is required to ensure this education provision can meet the needs of Marcombe*, the second new community (WS01) and the wider aspiration of the plan during the plan period (2020 – 2042). This infrastructure will also provide for Marcombe in terms of secondary and SEND education provision beyond the plan period, up to 10,000 homes.</b> Costs are likely to increase to reflect abnormal delivery costs due to site size. <b>(*An additional primary school with provision for early years is also required to meet the needs of Marcombe for this age range during the plan period 2020 – 2042).”</b> |
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| EDU-11 | 1 | Marlcombe | New primary school of 525 places (with capability of expansion) and early years provision for 0-5 year olds on a 2.6ha site | £13,138,725 | Development Contributions, DCC | 2029-2042 | Devon County Council | This education provision will meet the needs of Marlcombe, the second new community (WS01) during the plan period (2020-2042) and the wider aspiration of the plan for the development of Marlcombe.    | For clarity, DCC requests that the description is amended to state: "New primary school of 525 places (with capability of expansion <b>to 630 places</b> ) and early years provision for 0-5 year olds on a 2.6ha site." Also, the IDP could be reorganised to position this item in the row below EDU-9 to reflect the order in which the education infrastructure is likely to be delivered at Marlcombe. There are also currently two items referred to as EDU-11 which will require amendment. |
| EDU-13 | 1 | Marlcombe | New primary school of 420 places with early years provision for 0-5 year olds on a 1.8ha site                               | £10,543,260 | Development Contributions, DCC | Post-2042 | Devon County Council | This education provision will meet the needs of Marlcombe as it expands from 8,000 to 10,000 homes. Land for the expansion of the town is not identified in the Local Plan but the policy aspiration is | DCC welcomes the inclusion of all education infrastructure required for 10,000 homes at Marlcombe in this IDP.   |

|                           |          |          |   |             |                                   |           |                                    | set within it, together with the need to consider the infrastructure requirements for the expansion of the town.   |  |
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| <b>Transport Projects</b> |          |          |   |             |                                   |           |                                    |  | <b>DCC Second Regulation 19 comments 22 January 2026</b>   |
| Reference                 | Priority | Location | Project   | Cost        | Potential Funding Sources         | Timescale | Delivery Organisation (s)          | Notes/additional justification   |  |
| TRA-1                     | 1        | West End | Additional passing loop on Waterloo train line and associated signalling infrastructure | £50,000,000 | Network Rail, EDDC, DCC, DfT, CIL | 2025-2031 | Network Rail, Devon County Council | This project would form part of an extension of the Devon Metro structure, and will enable a half hourly service between Axminster and Exeter. It provides mitigation against the road traffic impacts from the Cranbrook expansion areas. Potential | To fully reflect the scope of and rationale for potential infrastructure enhancements, DCC recommends that the project is renamed "Additional/ <b>extended</b> passing loop(s) on Waterloo train line and associated signalling infrastructure". DCC also requests that the Notes/additional justification are amended to read "It provides mitigation against the road traffic impacts from the Cranbrook expansion areas, <b>Marlcombe and other locations near the railway line</b> . Potential |

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|  |  |  |  |  |  |  | <p>location near Feniton. The Additional passing loop can enhance capacity through enabling greater train service frequency, making rail a more attractive and effective travel option. Cost is DCC estimate, Network Rail have not yet determined the cost.</p> <p>Mosshayne planning application re-submitted - will now be considered under CIL system, which could mean the potential contribution may not be secured.</p> | <p><b>additional passing loop near Whimble and extended passing loop west of Honiton. The additional/extended passing loop(s)</b> can enhance capacity through enabling greater train service frequency.”</p> <p>To future-proof this against planned changes to the rail industry, DCC recommends that “<b>Great British Railways</b>” is added as a Delivery Organisation.</p> |
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| TRA-9  | 2 | North of Topsham | Comprehensive package of transport measures to prioritise active travel and public transport in the Clyst Road area. To include:<br>- Continuous north-south walking and cycling route (Exeter LCWIP route E13)<br>- Enhancements to support walking/cycling on Old Rydon Lane<br>- Upgrade of Clyst Road to facilitate two-way bus route<br>- Bus service enhancements<br>- Shared mobility hubs<br>- Area-wide travel planning | TBC | S106, CIL, DCC   | 2025-2042 | Devon County Council, Developer, Bus operator | Draft Local Plan Strategic Policy WS10 proposes significant employment and residential development in the Clyst Road area, with draft text stating that a Development and Infrastructure Delivery Framework will be required, to include 'A comprehensive transport strategy to prioritise active travel and public transport'. | DCC recommends that “ <b>DfT</b> ” is added as a potential funding source   |
| TRA-11 | 3 | Exmouth          | Improvements to existing Avocet Line stations, including lengthening platforms and improving facilities  | TBC | S106, Train operating Company, DfT, DCC. Network Rail, CIL | 2025-2042 | Network Rail, Train Operating Company         |   | To future-proof this against planned changes to the rail industry, DCC recommends that “ <b>Great British Railways</b> ” is added as a Delivery Organisation. |

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| TRA-18 | 1 | Marlcombe | Primary highway connecting the A3052 to the A30 Exeter Airport Junction      | £40,000,000 | S106, external funding sources | 2029 – 2035 | Developer, Devon County Council                            | A north-south road will be needed to facilitate a route through the new community and help achieve the sustainable transport vision. | To clarify the need for the north-south road to support sustainable travel as well as private vehicular trips, DCC recommends the following wording for the Notes column:<br>“A north-south road will be needed to facilitate <b>bus and walking/cycling routes</b> through the new community and help achieve the sustainable transport vision. <b>However, consideration should be given to a bus gate prohibiting the passage of vehicular traffic at a certain point on this road, in order to prioritise sustainable transport and prevent the road being used as a through route, which could adversely impact people living in the new community.</b> ” |
| TRA-27 | 2 | Marlcombe | Additional passing loop(s)/double track, station enhancements and associated | £50,000,000 | S106, Network Rail, DCC, DfT   | 2025-2042   | Network Rail, Devon County Council, Great British Railways | This project would form part of an extension of the Devon Metro  | Although this project would be located within Exeter City Council’s boundaries, DCC recommends this project is identified in the East  |

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|  |  | <p><b>signalling infrastructure on Exmouth train line, between Exmouth Junction and Digby &amp; Sowton</b></p> |  |  |  |  | <p><b>structure, and will enable a 15-minute frequency between Exeter St Davids and Digby &amp; Sowton. It provides mitigation against the road traffic impacts from Marlcombe. The additional passing loop(s)/double track can enhance capacity through enabling greater train service frequency, making rail a more attractive and effective travel option. Cost is DCC estimate, Network Rail have not yet</b></p> | <p>Devon IDP in view of its potential to support development at Marlcombe, due to Digby &amp; Sowton being the closest station to southern parts of the allocation.</p> |
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**Education IDP**

**Notes:**

Costs are based on DCC policy at rates at June 2024 rates and subject to indexation.

<https://www.devon.gov.uk/planning/planning-policies/pupil-place-planning/>

School site sizes are based on the DfE’s BB103 and BB104 guidance (average of min and max areas) Area guidelines for mainstream schools (publishing.service.gov.uk)

Education land to be provided at nil cost to the Education Authority, fully serviced.

In addition, costs for home to school transport will be calculated on an individual site basis at the time the applications are validated.