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First Regulation 19 Consultation – East Devon Local Plan – Responses by Chapter

Filtered Data Export

11

Full name: Richard John Eley

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: I do not think that this section is sound. The Council has failed for many years to address the problems of inadequate walking and cycling provision and in particular the lack of promotion and maintenance. Our footpaths are generally in poor order and have lacked investment and care. This is partly because of the emphasis upon overly ambitious and very expensive cycle routes: I am thinking particularly of the Stop Line Way and the thus far undelivered Feniton to Sidmouth cycleway, and the poorly designed Sidford to Sidbury link.

We need a significant shift of emphasis away from cycling to walking. I am not anti-cycling, far from it. But we must recognize that six times as many people walk as cycle, and the cost of a cycleway is around a thousand times more than a footpath, both to create and to maintain. Walkers are not given the attention that they deserve. Investment is split roughly 50/50 with cyclists, which does not reflect the numbers involved.

We are wrong to adopt a citycentric approach to cars: Exeter quite rightly seeks to reduce the number of cars entering the city, for the quite proper concerns over pollution and congestion. Towns in East Devon do not have these problems on the same scale, and by and large, there is no great need to reduce cars in our towns and villages. Not least because they often do not have buses, trains or cyclewayx as alternatives to the car. Our town centres still very much rely upon cars to bring in customers, and tourists. The recent doubling of summer car park charges in our seaside towns saw a dramatic drop of 41% in carp ark usage, which will have had a massive negative impact upon our small businesses.

So we need a more subtle and thoughtful approach. And a greater emphasis upon walking as a recreation as well as a means of journeying to work or to school. In particular, we should be encouraging signed long distance walking routes to replicate the success of, for example, the East Devon Way and the Sid Valley Ring.

2(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Walking needs a much greater emphasis. Its importance for tourism is greatly under-estimated.

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: See above.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See above.

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter fails to comply with the duty to cooperate. Please be as precise as possible.: We should be liaising with neighbouring authorities to deliver long distance signed walking routes.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: I would like to explain why walking should be given a bigger emphasis.

Full name: Nick Pearce

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: It is not a question whether it is legally compliant, which I am sure it is, but it is more about the overall plan.

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: The plan for the west of the area is to build 10,000 dwellings. This is fine, we need more housing. But each of those houses will have a minimum of 1 vehicle and possibly more. The current transport infrastructure (A376, B3180 and A3052) is barely able to cope with levels of traffic today let alone an extra 10,000 vehicles. The levels of traffic now on a nice Saturday on the roads to Exmouth beach do not comply with your objectives. Objectives 2 - Net Zero, Objective 9 - Sustainable Transport and Objective 10 - Secure Infrastructure. Nowhere in this strategic plan is there way forward to cope with an dramatic increase in traffic.

I would like to suggest that to ease traffic going to Exmouth beach, a new park and ride is developed to replace Exmouth Town Football Ground. The ground could be moved to an out of town site. The station should be moved north to where the boat storage park is and then the whole issue of conflict between cars, pedestrians and cyclist can be solved. (Currently this is chaotic as you have pedestrians queueing for a bus across a cycle path, cars having to go a long way round to a train station).

I am not sure how Exmouth is going to work in the summer with so many more cars trying to get to the beach. Encourage the public to use a free park and ride rather than expensive parking. Make the land train join up with the park and ride. Develop a clear, safe and direct route for cyclist to get to the beach. Make Queens Drive restricted

access from the RNLI to Ocean. Make Rolle Street from Tesco Express to the Powder Monkey a pedestrian only to encourage less traffic. There needs to be a plan.

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

11.1

Full name: Karime Hassan MBE

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11.1

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: [Representation on behalf of Exeter Rugby Group based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation]

Transport infrastructure and impact on the highway network: The capacity of junction 30 of the M5 to support the planned developments in the emerging policies in this Regulation 19 consultation is a key consideration for the Club. While supporting Strategic Policy TR01: prioritising walking, wheeling, cycling and public transport, the implications of all the planned developments - even allowing for the mitigation of: Local Cycling and Walking Infrastructure Plans, recently constructed and proposed rail stations, Bus Service Improvement Plan, and Park and change, still present a significant concern. WSPs Greater Exeter Mitigation Modelling listed in the technical evidence concludes: “On the eastern side of Exeter around J29 and J30, a number of junctions remain over 100% capacity in the 2040 Core with mitigation scenario. These include movements on J29 and J30 themselves, as well as at Clyst St Mary roundabout and the A30 airport roundabout. While the strategic forecast modelling provides an indication of which junctions may have capacity issues, operational modelling would be required to confirm how well the junctions perform with forecast traffic flows. National Highways have an existing VISSIM model that covers J29, J30, the A30 Airport junction and the Clyst St Mary roundabout – discussions are currently underway regarding the use of this model to test these junctions in the 2040 Core and 2040 Core with mitigation scenarios. This will take flow changes from this strategic model and be able to provide a better indication of the impacts the additional traffic from the emerging Local Plans will have on the network.” Simply stated, the technical evidence base, presently, does not give sufficient comfort that all the planned developments can be accommodated on the highway network without significant interventions that are presently unknown, this may not be unusual for the scale of the projects proposed. However, the acceptability of the developments on the highway network and the impact on businesses and communities as a consequence of congestion and delays requires further modelling and

assessment, and appropriately raises the question of the funding and delivery mechanisms required, as well as the complex range of mitigation programmes and measures that will need to accompany the required interventions in the network. It further underlines why the infrastructure plan, delivery vehicle and potential governance structure and co-ordination with both district councils and County Council is essential for the successful delivery of the strategic policies, and this goes to the heart of the test of effectiveness and soundness of the plan. This appears to be recognised in the policies and text supporting the policies, and this is welcomed. In the context of uncertainty over local government reorganisation the soundness of the strategic policies may in part be dependent on future governance and structures that fulfil a purpose of delivering early infrastructure funding to address viability and practical delivery challenges – these may go beyond any single developer’s ability to deliver. For clarity, this representation is not an objection to the soundness of the Plan, it simply reinforces the need to support the approach of a comprehensive and co-ordinated approach to the spatial plan and delivery of the strategic policies. The club does not want to be in a position where the motorway junctions and local road networks are gridlocked as a consequence of incremental developments over the plan period, with the transport authority having insufficient funding to deliver the transport strategy. Presently the wording in the Emerging plan and intent appears designed to achieve the same aim and is therefore supported. The Club has had a productive relationship with the local transport authority in managing the Club’s match day access strategy to ensure that the club works in a co-ordinated manner with a range of key stakeholders to ensure a positive journey experience for visitors to high profile events and minimising impacts on residents/businesses who may be affected. The Club has worked with Devon County Council to support active travel and effective co-ordination between the public sector transport providers. The venue has hosted Rugby World Cup games and has demonstrated successfully that by using park and ride shuttle services from sites within the West End in East Devon the stadium can accommodate capacity crowds and a positive experience. It is vital to the club and to the significant public interest of our local community that the transport implications of the planned growth, particularly within the West End are fully modelled, assessed and any requirements arising pulled through into a delivery plan and funding mechanism.

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11.1

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:

1. Further to the publishing of the Regulation 19 Publication Draft of the East Devon Local Plan 2020-2042 on 13 February 2025, National Highways write to provide comments relating to the soundness of the Publication Draft, and to make recommendations for areas in which the plan and associated policies should be strengthened from the perspective of protecting the Strategic Road Network (SRN).

2. We understand that a further Regulation 19 consultation will be held later this year in connection with the planned development of a Second New Community for East Devon. It is currently unclear to what extent the consultation will include additional materials and transport evidence related to the New Community site. The proposal for a Second New Community represents a major component of the Publication Draft plan and has considerable potential impact on the SRN, we therefore provide comments on this as part of this first R19 consultation. Nevertheless, we shall comment further, as appropriate as part of the forthcoming R19 New Community consultation.

3. On behalf of the Secretary of State for Transport, National Highways is responsible for operating, maintaining and improving the Strategic Road Network (SRN). Our approach to plan making is specified by the Department for Transport (DfT) Circular 01/22 'Strategic road network and the delivery of sustainable development'. The Strategic Road Network

4. Locally, the SRN comprises the M5 motorway and the A30, A303 and A35 Trunk Roads, with the M5 Junctions 29 (J29) and 30 (J30) located on the boundary between the East Devon District Council authority area and that of the neighbouring Exeter City Council. The A30 Trunk Road runs east from M5 J29 through East Devon and connects to the A35 at Honiton and the A303 east of Upottery. Both routes continue eastwards to the authority boundary, with the A35 passing to the immediate south of Axminster.

5. The section of the M5 that forms the western boundary of East Devon is characterised by high traffic demands, particularly during commuter periods, along with Bank Holiday

and Summer periods. M5 J29 and the A30 provide access to the Exeter & East Devon Enterprise Zone, which includes the Exeter Science Park. Around two kilometres east of M5 J29, the A30 Airport junction provides access to Exeter Airport, the Skypark development and the growing Cranbrook New Community. A short distance to the south-west of the East Devon authority area, Junction 31 (J31) of the M5 forms a key interchange between the motorway and Trunk Road networks, catering for journeys into Teignbridge and West Devon via the A38 and A30 respectively, and for longer distance journeys towards Cornwall. Policy Context

6. National Highways input to the Local Plan process is guided by the National Planning Policy Framework (NPPF) and DfT Circular 01/2022.

7. Paragraph 26 of the NPPF advises that “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere”. National Highways continues to work collaboratively with East Devon District Council, neighbouring planning authorities and Devon County Council regarding the preparation of transport evidence and a Greater Exeter Transport Strategy to underpin planned growth. East Devon forms part of the Exeter Functional Economic Market Area (FEMA) which also includes Exeter, Mid Devon and Teignbridge.

8. Traffic modelling evidence submitted in support of the East Devon Local Plan has been developed in consultation with National Highways, and we are continuing to undertake our own operational assessment work for selected SRN junctions to consider the potential cumulative impacts of growth across the Greater Exeter area. Further modelling has also been undertaken by Devon County Council to consider the impact of Local Plan growth at Honiton and Axminster on the A30 and A35 respectively.

9. The NPPF prescribes that transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. Nevertheless, potential significant impacts on the transport network may require highway infrastructure improvements, with the DfT Circular 01/2022 making it clear that “The policies and allocations that result from plan-making must not compromise the SRN’s prime function to enable the long-distance movement of people and goods”. 10. Paragraph 29 of the Circular goes on to advise the following in respect of the identification of infrastructure requirements: “New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway

infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.” 11. In line with the vision-led planning approach now enshrined in national policy, Paragraph 33 of the Circular advises that, “...The company can review measures that would help to avoid or significantly reduce the need for additional infrastructure on the SRN where development can be delivered through identified improvements to the local transport network, to include infrastructure that promotes walking, wheeling, cycling, public transport and shared travel. A robust evidence-base will be required, including demand forecasting models, which inform analysis of alternatives by accounting for the effects of possible mitigation scenarios that shift demand into less carbon intensive forms of travel”. 12. Paragraph 34 of the DfT Circular advises that, “The company’s engagement with plan-making will help inform the preparation of the local authority infrastructure delivery evidence base. From a transport perspective, this evidence should provide a means of demonstrating to the examining inspector, development industry and local communities that planned growth is deliverable, and that the funding, partners and relevant processes are in place to enable the delivery of infrastructure; or that there is a realistic prospect that longer term investment can be secured within the timescales envisaged.” An Infrastructure Delivery Plan (IDP) (dated February 2025) has been submitted in support of the Publication Draft East Devon Local Plan. We understand that the IDP will sit alongside the adopted IDP for the adopted Cranbrook Plan covering the Cranbrook New Community, and that a separate IDP will also be produced for the Second New Community. It is critical that the continuation of transport evidence work in respect of the Second New Community and the Greater Exeter Transport Strategy should inform any necessary updates to the IDPs, to ensure that the identified level of growth can be realised without significant adverse impacts.

11.3

Full name: Roy Russell

Organisation (where relevant): Sidmouth Cycling Campaign

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11.3

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: This paragraph correctly refers to the Local Cycling and Walking Infrastructure Plans, but has an obsolete reference (65) to the 2015 Cycling and Multi-Use Trail Network Strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Amend reference to correctly refer to the LCWIP instead of the Network Strategy

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

11.5

Full name: Kerry Kennell

Organisation (where relevant): Ottery St Mary Town Council

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11.5

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not legally compliant. Please be as precise as possible.: P186 mentions "bespoke bus service serving Ottery St Mary" linking to Exeter. No significant improvements included. There should be a focus on how you walk or cycle into Ottery town. It was felt that residents still need a car to get out of Ottery. Need stipulations that "enhance safe travel".

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

11.6

Full name: Thomas Shillitoe

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11.6

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: This paragraph is ambiguous, the figure of 1,600 metres should not be used, distance to services/facilities etc should be 800m as the 1600m is total trip 'there and back' [All links reference on p.186 of the Local Plan are broken/out of date but the Government's National Design Guide does states 800m. "Sustran, Walkable neighbourhoods" also states 800m as standard walkable distance and 1600m total trip]. Distances should be measured from site centres, not nearest point, as for a site like Exmo_20 the entire site is over 800m long. All site sustainability / accessibility must be reassessed using the above criteria.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: All site sustainability / accessibility must be reassessed using the above 800m / centre point of site criteria.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Sites have not been assessed in accordance with a corrected 800m figure and now should be.

11.13

Full name: Peter Strouts

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 11.13

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not legally compliant. Please be as precise as possible.: You admit the developments will create substantial vehicle movements, this is not sustainable development in itself. Developments over a km from a train must admit that they are near to a rail station and this can not be factored into the sites assessment for planning.

2(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Why is there no investment in the infrastructure, such as improving the Exmouth to Exeter rail line. More services or even extending the track..

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

TR01

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The strategic policies for transport for new developments should include provision of traffic free cycle networks linking developments with neighbouring communities and towns; public transport facilities and services linking neighbouring communities and towns; and provision of electric vehicle charging for at least 75% of planned road vehicle parking.

Full name: Terry Sneller

Organisation (where relevant): Dorset Council

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Similarly, through the application of Policy TR01, contributions towards public transport provision should consider the opportunities to connect to Lyme Regis.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Vistry support Policy TR01 and agree that walking, wheeling, cycling and public transport should be the natural first choice for short local journeys, or as part of a longer journey, and therefore should be prioritised in new development.

Land at Addlepool Farm is in a sustainable location and is in close proximity to sustainable modes of transport, with good connectivity to the main district and regional centres of Topsham and Exeter. Clyst St George currently has good public transport connections and is served via several bus services providing connections to Topsham, Woodbury, Exeter and the villages in between.

The proposed development will also provide wider benefits associated with services and facilities through the provision of improved bus, cycle and footpath connections, a local centre, a new primary school, green infrastructure, biodiversity enhancements, new open spaces and supporting wider access to the countryside. This will enhance the facilities and services on offer to existing residents within Clyst St George and beyond.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:

2.89 We support EDDC's requirement for walking, wheeling, cycling and public transport to be the first natural choice for short local journeys.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C R Down Farming Ltd and Stuart Partners Ltd

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: CarneySweeney acts for CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon.

The aims of Policy TR01 are supported.

Alignment with the Devon County Council (DCC) Bus Plan is arguably realistic in larger settlements with existing or planned high-frequency routes. However, in rural areas, additional funding and strategic interventions over and above those capable of being supported by development allocations (e.g. flexible demand responsive services) might be required to fully integrate the bus network. Policy TR01 should acknowledge the following:

- The feasibility of integration – ensuring alignment where practical, particularly in urban areas and key development locations
- Challenges in rural areas – recognising that full alignment may not always be possible due to service constraints

- Commitment to improvements – supporting enhancements to public infrastructure in collaboration with DCC.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Suggested wording to address this point is:

Development proposals should contribute to public transport enhancements, aligning with the Devon County Council Bus Plan where feasible, particularly in designated growth areas. Proposals should facilitate convenient access to public transport by incorporating well-positioned bus stops, mobility hubs, and transport interchange points where practicable. Recognising that full integration with the DCC Bus Plan may not be achievable in all locations, particularly in rural areas, developers are encouraged to explore alternative solutions, such as demand-responsive transport, community-led initiatives, or enhanced active travel infrastructure to improve connectivity.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): CR Down Farming Ltd and Stuart Partners Ltd

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: The aims of Policy TR01 are supported. Alignment with the Devon County Council (DCC) Bus Plan is arguably realistic in larger settlements with existing or planned high-frequency routes. However, in rural areas, additional funding and strategic interventions over and above those capable of being supported by development allocations (e.g. flexible demand responsive services) might be required to fully integrate the bus network. Policy TR01 should acknowledge the following:

- The feasibility of integration – ensuring alignment where practical, particularly in urban areas and key development locations
- Challenges in rural areas – recognising that full alignment may not always be possible due to service constraints
- Commitment to improvements – supporting enhancements to public infrastructure in collaboration with DCC.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Suggested wording to address this point is:

Development proposals should contribute to public transport enhancements, aligning with the Devon County Council Bus Plan where feasible, particularly in designated growth areas. Proposals should facilitate convenient access to public transport by incorporating well-positioned bus stops, mobility hubs, and transport interchange points where practicable. Recognising that full integration with the DCC Bus Plan may not be achievable in all locations, particularly in rural areas, developers are encouraged to explore alternative solutions, such as demand-responsive transport, community-led initiatives, or enhanced active travel infrastructure to improve connectivity.

Full name: Oliver Keates

Organisation (where relevant): OBK Land and Planning Ltd

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: I fully support this policy which places a priority on walking/ cycling for new development.

Full name: Edward Blackmore

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not legally compliant. Please be as precise as possible.: I believe Exmo_20 is in conflict with policy TR01. As walking or cycling will not be the first choice of transport from this site for people to do their shopping/ work/ school run etc because the distance is too great. Studies cited in the Local Plan show that most people prefer to walk if their destination is within 0.5 miles, that beyond the distance of 1 mile cars are the dominant mode of travel and that beyond 2 miles trips on foot are few. Exmo_20 is significantly further than 0.5 miles or even 1 mile from essential infrastructure and services therefore walking or cycling as first choice of transport is unviable. Providing walking routes, cycle paths or public transport will do little to reduce the amount of car journeys this development would generate because the steep local topography and distance to access essential infrastructure and services is too far. It will also be a difficult location for those without car access and cause social exclusion. Southern Wood is a small cul-de-sac and with current householders parking on the road, it will be difficult for traffic to gain any access. Also Stagecoach previously ran buses through Meadow View, but had to stop due to issues with getting the buses past parked cars.

2(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I do not believe there is a way to improve access from this part of the development and an alternative location for access would be needed from Salterton Road.

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:

The TR01 Policy has to propose that walking, wheeling, cycling and public transport should be the natural first choice and that walking and cycling routes must be prioritised in new development, due to the location and distance from the centre of Exmouth that is not possible.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

I do not believe there is a way to improve access from this part of the development and an alternative location for access would be needed from Salterton Road.

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

Lack of thought to sustainable, practical, transports links

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: will halwyn

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: I would like to see the policy strengthened and take into account the rural nature of the area, with support for retaining safe pedestrian/cycle interconnectedness of villages; Where minimal traffic routes are used to connect villages to surrounding resources or communities these should be identified and development should not be allowed that would increase traffic along these routes and result in the loss of the freedom of movement otherwise afforded.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Interested.

Full name: jane moffatt

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

2(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not legally compliant. Please be as precise as possible.: TR01 focuses on settlements which have public transport and/or cycle routes. This has put a huge focus for development on Lypstone and Exmouth using the excuse that most people can use the train or cycle to work. This is simply not true and totally impractical. For residents of Lypstone, the train only goes to Exmouth or Exeter and our recent survey on transport needs shows most households have to commute by car to both work and schools. The nearest large supermarket can only be accessed via car as it would take both train and a combination of bus routes to get to it. Walking or cycling is just not possible.

This part of the local plan is admirable but it has been used to dump overdevelopment on both these settlements.

2(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Lypstone was designated a tier 3 settlement, allowing approx 53 houses. EDDC have assigned over 300 houses using the argument of sustainable transport links. Remove the Lypstone sites from the plan and return to the 53 houses in the original plan.

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: David Morgan

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport.

Comment: pages 183-4, Paragraph 11.5), quote: “Exmouth, Honiton, Seaton, and Ottery St Mary have bespoke bus services, with several high-frequency routes linking East Devon settlements to Exeter. The district has nine train stations across two lines, with significant usage increases over the past 20 years. High-quality active travel corridors, like the Exe Estuary Trail, are also present.” The Justification for Policy TR01 fails to recognise there are disparities in this ‘broad brush’ assumption contained in paragraph 11.5. Towns such as Seaton have no bus services serving the town from Exeter after 7:05PM for six days of the week, (6:05PM on Sundays), whereas Exmouth, Honiton and Ottery St Mary do. Nor is there a bus service from Axminster to Seaton after 6:30PM for six days of the week, (Mondays to Saturdays), and none on Sundays, to provide a link with Axminster’s railway station. There is also no bus service from Honiton to Seaton after 5:50PM, or after 5:05PM from Seaton to Honiton, for seven days of the week, to provide a link with Honiton and its railway station. Moreover, compared to Honiton, Sidmouth and Exmouth which have at least two bus services an hour providing a direct bus link to Exeter, Seaton on average has one bus service an hour linking the town with Exeter city, from 10am until 7PM. Furthermore, Policy TR01 does not take into account there is no early morning bus service from Seaton (before 8am) on Saturdays and Sundays to any destinations, including Axminster, Sidmouth, Honiton and Exeter, all of which are major hubs for employment, medical facilities, leisure and recreational activities. Moreover, Sunday services are also limited from Seaton, with just one bus route (the 9A) operating to provide a connection with Sidmouth and Exeter. Unlike Exmouth, Axminster and Honiton, Seaton does not have a supplementary railway to provide further travelling opportunities on public transport. Therefore, Transport Policy TR01’s ‘broadbrush’ assumption that each of the aforementioned towns has a comparable level of “high-frequency routes linking East Devon settlements to Exeter” is incorrect. It must, therefore, must be disregarded in relation to suggesting it meets the needs of residents living in Seaton and the surrounding parishes.

Full name: Helen Mary Roulson

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Regular storms affect out public transport links already. The road between Sidbury and Sidford floods regularly with heavy downpours and gets cancelled. Improvements need to be made at flash points. Rail services appear to be fragile in the face of storms. Much improved maintenance of trees need to be proactively maintained rather than reactive and paused servies.

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Reference should be made to designing linear transport links which consider and provide enhancements to biodiversity.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reference should be made to designing linear transport links which consider and provide enhancements to biodiversity.

Full name: Helene Jessop

Organisation (where relevant): RSPB

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: RSPB supports this policy. It accords with the National Planning Policy Framework (December 2024) chapter 9 on Promoting sustainable transport, and specifically para 109e. Facilitating more active travel and use of public transport over reliance of private cars is better for the environment and, critically in reference to the East Devon heaths SPA/SAC, reducing reliance on private cars for commuting will help in reducing polluting emissions.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Prioritising Active and Public Transport (Strategic Policy TR01 & Broadclyst T4, T5)

- The Local Plan mandates that all new developments prioritise walking, cycling, and public transport over car travel.
- Broadclyst's Policy T4 requires comprehensive cycling infrastructure, including safe crossings and cycle storage.
- Low-carbon travel incentives (Policy T5) include electric bike hire schemes, bus connectivity enhancements, and charging infrastructure for electric vehicles.

Full name: Lucy Tyrrell

Organisation (where relevant): Lymptstone Parish Council

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Walking and wheeling as a priority is not possible safely in Lymptstone where the roads are predominantly Devon lanes with no pavements, and the A376, which splits the parish in two. Bus services to Lymptstone are limited, and do not carry passengers to the rail station. The sustainability appraisal and site selection process which defines a sustainable location as being a 20 minute walk, does not take into account public safety i.e. no pavements on the majority of our roads. (reference Appendix B, and photos 2 and 3 above).

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Strategic Policy TR01 prioritises the provision of facilities for active and sustainable travel modes as part of new development and seeks to align new proposals with existing plans such as the Local Cycling and Walking Infrastructure Plan and Bus Service Improvement Plan. The policy is supported by National Highways.

Full name: Craig Hatton

Organisation (where relevant): Network Rail

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Network Rail supports the prioritisation of public transport and is working with the Council to deliver the Devon Metro rail link. As a priority, developer contributions should fund the link and other rail improvements that are required to support growth. Network Rail is supportive of the Council's approach to this Policy and will continue to work with East Devon to deliver these improvements.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Grace Lewis

Organisation (where relevant): Network Rail

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR01

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: This policy looks at the concept of mobility hubs to promote walking, cycling and public transport usage through secure cycle storage, bus stops, car sharing spaces etc all being in one place. It would be beneficial to prioritise mobility hubs, where existing integration between modes and facilities are currently lacking/a priority in light of future development. This could include stations such as Exmouth, Lympstone Village and Topsham

TR02

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To align this policy with the priority schemes identified in the Countywide Local Cycling and Walking Infrastructure Plan (which was formally adopted by Devon County Council in March 2025), the county council requests that the following routes are added to the bullet points in Policy TR02 under the Strategic cycle network schemes:

- Otter Trail
- Beer to Axminster and Uplyme

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Vistry support Strategic Policy TR02 and the welcome support from the Council for the delivery of sites and routes that are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.

Land at Addlepool Farm does not require significant transport improvements or infrastructure to be delivered and can come forward on its own to accommodate a self-sufficient, sustainable, new village on the western edge of East Devon.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:

2.91 It is noted that the Council will support the delivery of sites and routes that are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development, and this will include aiding the delivery of routes including the Local Cycling and Walking Infrastructure Plans, Bus Service Improvement Plans, Local Transport Plans.

Full name: Jemma Shorrock

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Persimmon Homes South West Limited

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Whilst PHSW acknowledge the importance of developing infrastructure, we consider Strategic Policy TR02 to be unjustified due to lack of sufficient evidence regarding the delivery and viability of the Axminster relief road.

Within the evidence base for the Draft LP, there is no evidence of a review of the current requirement for a relief road, nor is there any information demonstrating that the relief road is viable, deliverable or justified following the history of funding issues. Until the evidence base is updated accordingly to include further information with regards to the delivery of the relief road, there is no justification for safeguarding land for the purposes of the Axminster relief road. To be considered sound, any reference to safeguarding land for the route of Axminster relief road should be removed from Policy TR02.

The proposed development at land at east Axminster is deliverable and is not reliant on the relief road to come forward.

Full name: Dan Yeates

Organisation (where relevant): Savills

Other party name (if relevant): Sidbury LVA LLP

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: We support draft Policy TR02, and specifically the Sidford to Sidbury Strategic cycle network schemes. We agree that the delivery of this route is critical in developing infrastructure to widen transport choice in the local area.

However, in order to ensure this critical infrastructure is delivered it is vital that new development is supported in order to aid the delivery of such infrastructure. It is clear for example that for the entirety of the Sidford to Sidbury route to be delivered this will require the delivery of the Land South of Furzehill, Sidbury (SIDM_34). Indeed, draft Policy SIDM_34 reflects this by stating “development of this site will enable the second phase of the Devon County Council proposed multi-use trail”. The pending outline planning application for the site (ref: 24/2434/MOUT) also includes the provision of the second phase of the multi-use path and is therefore consistent with the aspirations of both draft policies TR02 and SIDM_34.

It is therefore clear that the delivery of the two go hand in hand, so it therefore follows that both should be supported as part of the draft local plan.

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is important that Sidbury LVA LLP is present to participate in the hearing session for Policy TR02 owing to their interest in Land South of Furzehill (Sidm_34). It is important that they are given the opportunity to make their case in relation to this policy.

Full name: will halwyn

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: I would like to vouce strong support for passing loops on the railway line.

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: I would like to see the feniton to ottery cycle route scheme included in the plan as this would have significant transport interconnectedness benefits, giving ottery residents car-free access to the waterloo railway line.

Full name: Dr Robert Murdoch

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: EXMO 20 is a rural development based around the B3179 with no public transport along that section or indeed St Johns Rd. Public transport access would need to be enhanced. Car access to B3179 would be dangerous from the proposed development as this follows the national speed limit

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Helena Ryan

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Further to this, the "Development would be expected to play its role in delivering part of the Sidbury to Sidmouth cycle route through the allocation". The one person in favour of this development was from the Sidmouth Cycling Campaign, who although they want a cycle route, pointed out the current plan of having the multi-use path coming from the site onto Ebdon Lane in order to connect to the phase 1 cycle route, is considerably steeper, approximately a 15% gradient, than the absolute maximum gradient of 8% specified in LTN 1/20. Even ignoring the steepness of the road, the exit from the phase one route onto Ebdon lane would take cyclists downhill on a blind corner on a single lane road, that although not busy all day every day, certainly has busy periods with farm vehicles so big they take up the entire width of the lane, repeatedly driving up and down it. How anyone taking toddlers in a cargo bike or families with small children on their own bikes, for example, could be expected to use this route is beyond me.

The Sidmouth Cycling Campaign also pointed out that the high differential from the site down to the road for the proposed footpath is also steep and impractical, bearing in mind the need to accommodate disabled people. They then suggested a location further up Ebdon Lane. As far as I can see, there is no location along Ebdon Lane where the height difference would make a suitable footpath exit/entrance, and in any case would mean anyone in a wheelchair having to push their way up the hill to it, or hold back their wheelchair in order to safely come down it to the A375.

Regarding both Phase one of the Sidmouth cycle route (SD06) Land west of Two Bridges (sidm_06a) Sidford, and phase two, SD26 Development Allocation at Sidbury. LTN 1/20 guidelines say that cycle route designs should be inclusive - from eight to eighty and beyond, and be accessible, catering for the broadest range of people and abilities.

Clearly, this is not possible if any part of the route includes Ebdon Lane, at least as far as what is currently proposed.

The guidelines also state that cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles. Neither phase one nor phase two adhere to this.

LTN/1/20 4.2.9 further suggests that, "Not only must cycle infrastructure be safe, it should also be perceived to be safe so that more people feel able to cycle". I have been told that some parents are wary of allowing their children to use the Sidford to Sidbury cycle route due to it running across the middle of two or three fields with no buildings overlooking it and not easily visible from the road. This would be even more problematic in winter due to poor or little light, and made worse again when there is no easy access to the route except from either end at Hillside/Ebdon Lane or Ottery Lane. The worry is not just stranger danger, but also of accidents.

Also from LTN/1/20 4/2/12 - "Cycle routes remote from roads may have other risks relating to crime and personal security. The risk of crime can be reduced through the removal of hiding places along a route, by providing frequent access points, lighting, and by passive surveillance from overlooking buildings and other users".

Sustrans, a UK-based charity and custodian of the National cycle Network, suggests that, "National funding should ensure any proposed local schemes include a safety audit and address personal safety". They go on to say, "Good levels of visibility along routes through clear sightlines, avoiding blind corners, and lighting which is provided at a human-scale, which makes it easy to recognise people and does not result in long shadows, rather than reliance on tall streetlights provided for highways." Is any of this being considered, especially for the phase one Sidford to Sidbury part of the route? Has a safety evaluation including looking at personal safety been carried out?

I believe the council is in danger of creating a white elephant that will largely be used by mountain bike and gravel bike riders. A site visit is a necessity as looking at photographs or a map do not give a clear impression of the steepness of the hills here in Sidbury, or how dangerous the terrain might be for personal safety. Visit steep, busy roads like Hillside, when people are pulling out of driveways onto the narrow road to go off to work, so you can see how dangerous it would be if children using the road to reach the cycle

path at the same time were added into the mix, or at the other end of the day when people are returning from work and children would be returning from after school activities.

A safe, level cycle route would be fantastic to have, but the only way I can see it working here would be for it to run along as close to the A375 as possible. Put it behind a hedge, keep the hedges cut low so the cycle route is visible or perhaps create an elevated cycle path, but don't waste money on a plan that is only usable by a small percentage of the population.

Kind regards

Helena Ryan

Full name: Donna Crabtree

Organisation (where relevant): National Trust

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Strategic Policy TR02: Protecting transport sites and routes The National Trust previously set out in respect of Strategic Policy 66 (at Reg 18 stage), that it would be beneficial if at further details could be set out with regards to the Partnership working required to ensure that these strategic trails are connected to the wider active travel network, where these cross Local Planning Authority boundaries. These comments remain applicable to the updated policy wording.

Full name: Helene Jessop

Organisation (where relevant): RSPB

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: RSPB supports the delivery of sites and routes in respect of enabling active travel and public transport instead of prioritising further private car use. This accords with National Planning Policy Framework (December 2024), chapter 9 Promoting sustainable transport.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Strategic Policy TR02 seeks to protect sites and routes that are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development. Protected sites and routes of interest to National Highways include the Cranbrook to Exeter cycle route, rail passing loops between Honiton and Cranbrook, a bus priority route on approach to M5 J30 and improvements to the Clyst St Mary roundabout, improvements to the A30 Airport junction, and the route of the Axminster relief road. 53. The policy is supported by National Highways, but we recommend that East Devon District Council commit to strong cross-boundary working with neighbouring authorities (particularly Exeter City Council and Devon County Council) where routes would facilitate cross-boundary travel. Any further transport sites and routes identified as part of ongoing work on the Greater Exeter Transport Strategy should also be included in the final policy wording, and as necessary should also be identified in the IDP. This is particularly relevant for the Second New Community where the vision for the site should promote sustainable travel to nearby areas of employment and transport facilities.

Full name: Craig Hatton

Organisation (where relevant): Network Rail

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR02

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Network Rail supports the protection of the passing loop from Honiton to Cranbrook as part of the Policy as this is an essential part of delivering improved rail connections. Network Rail will continue to engage with the Council on this.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

TR03

Full name: George Marshall

Organisation (where relevant): Exeter City Council

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR03

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Transport Development allocations in the area will have implications on the transport network and these will be felt at Exeter due to the city's role at the centre of England's second largest travel to work area. In recognition of this, the City Council welcomes the collaborative approach being taken forward through the strategic traffic modelling and transport strategy for the area. This involves East Devon, Exeter, Mid Devon and Teignbridge Councils together with Devon County Council as highway authority and National Highways. The City Council looks forward to the continuation of this work to ensure that development impacts of the various local plans in the area are managed appropriately.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR03

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Vistry support Policy TR03 and agree with the proposed requirement for a transport statement or transport assessment, and subsequent travel plan if a development is likely to generate significant amounts of vehicle movements

Paragraph 117 of the NPPF (2023) which states that “all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.” Vistry therefore considers that Policy TR03 is consistent with National Policy.

A future planning application on Addlepool Farm will be supported by relevant Travel Plans and Transport Assessments.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR03

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:

3.20 The policy sets out the requirement of a transport assessment/statement, followed by a subsequent travel plan, to be submitted as part of the application for schemes that will likely generate significant amounts of vehicular movements.

3.21 This policy is supported and a future planning application relating to land off Northcote Hill will be supported by a suitable Travel Plan and Transport Assessment in accordance with this Draft LP policy.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C R Down Farming Ltd and Stuart Partners Ltd

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR03

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Policy TR03 mirrors the Framework, which already mandates that significant developments must provide transport assessments and travel plans and Policy TR03 essentially repeats this requirement without materially altering or expanding it.

We have the following detailed comments:

C. It is not clear to us why or how a TS/TA should take into account proximity to environmental designations.

E. It is not clear to us what is being required.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It is considered that Policy TR03 would be better addressed as a validation requirement.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): CR Down Farming Ltd and Stuart Partners Ltd

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR03

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Policy TR03 mirrors the Framework, which already mandates that significant developments must provide transport assessments and travel plans and Policy TR03 essentially repeats this requirement without materially altering or expanding it. We have the following detailed comments: C. It is not clear to us why or how a TS/TA should take into account proximity to environmental designations. E. It is not clear to us what is being required.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It is considered that Policy TR03 would be better addressed as a validation requirement.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR03

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR03

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:

5.13 Draft Policy TR03 outlines EDDCs approach to Travel Plans, Transport Statements and Transport Assessments. 5.15 The Landowner supports the above policies and expects that development of the promotion site for around 150 dwellings will comply with all the requirements of the above.

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR03

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Strategic Policy TR03 identifies the need to prepare a Travel Plan, Transport Statement or Transport Assessment for developments likely to generate significant amounts of vehicle movements. 55. The policy does not define what represents a ‘significant amount’ and it would be helpful if guidance was provided. We consider that the requirement should be extended to people movements rather than just vehicle movements . Reference to the need for a ‘vision-led’ transport statement or transport assessment, and the need to monitor travel outcomes through the Travel Plan process could also be included to reflect latest guidance set out in the National Planning Policy Framework (NPPF). 56. Whilst the focus of Strategic Policy TR03 is in terms of sustainable travel arrangements, it should also reference the potential need for assessments to identify measures that mitigate highway safety concerns or adverse impacts associated with additional traffic demand. As is noted in supporting text at paragraph 11.14 of the publication draft, new developments will still generate car travel, especially in rural East Devon, necessitating policies to address transport network impacts. 57. It is recommended that the current wording of TR03 could be amended to better address the risk that sustainable travel measures are insufficient to address highway impacts, with highway improvements therefore required to address residual impacts or remedial issues identified through monitoring.

Full name: Craig Hatton

Organisation (where relevant): Network Rail

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR03

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Network Rail supports the Policy as it is effective at assessing transport needs from proposed development and provides full consideration of these issues.

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Grace Lewis

Organisation (where relevant): Network Rail

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR03

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Where transport assessments and statements are required, the assessment of the impact of development on level crossings should be included to understand what the predicted use for vehicular, pedestrian and cycle would be following the occupation of this proposed site. The risk level would then be assessed against the predicted forecast of usage.

Where an increase in use is predicted, we would need to understand what mitigation the developer proposes and how this will be included within any future planning application, so that any increase in risk, is either at the same level as is experienced today or less.

Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

TR04

Full name: Roy Russell

Organisation (where relevant): Sidmouth Cycling Campaign

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Class E(a) (both non-food retail and supermarket/food retail) The short stay cycle parking standard of 1 per 6 staff should be replaced by “1 per 200 sqm” to accord with LTN 1/20, Table 11.1. There are a number of planning classes missing from this policy such as E(c) to E(f), C2, F1 and F2.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Class E(a) (both non-food retail and supermarket/food retail) The short stay cycle parking standard of 1 per 6 staff should be replaced by “1 per 200 sqm” to accord with LTN 1/20, Table 11.1. There are a number of planning classes missing from this policy such as E(c) to E(f), C2, F1 and F2.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Whilst Vistry do not object to a parking policy within EDDC's emerging LP, we question whether the proposed requirement for an average of 1.7 spaces per residential dwelling is effective, and request that greater clarity be provided within the proposed policy text.

This blanket approach offers no flexibility and does not consider site's locational context, which may justify adopting an alternative approach to parking. Car parking requirements for development schemes should be established on a case-by-case basis.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure that the draft policy is sound, we strongly recommend that the reference to 1.7 spaces per residential dwelling is omitted from this policy.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:

3.22 We acknowledge the requirements of Policy TR04, which set parking standards for new development within the district.

3.23 Draft LP policy stipulates 1.7 car parking spaces will need to be provided per dwelling across all residential developments within East Devon. This blanket approach offers no flexibility and does not consider a site's locational context, which may justify adopting an alternative approach to parking.

3.24 Whilst we do not object to the provision of a parking policy, or the policy text which requires parking provision to be of sufficient size to accommodate vehicles and to consider access/egress, we object to the inclusion of the restrictive minimum parking standards. At present this part of the policy is not effective.

Full name: Jemma Shorrock

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Persimmon Homes South West Limited

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Policy TR04 proposes an average of 1.7 car parking spaces per dwelling (rounded up to the nearest whole number in individual applications) and 1 cycle parking space per bedroom.

PHSW Support Policy TR04 and welcome the flexibility for different provision based on public transport accessibility, the nature of occupants of dwellings or presence of locally available off-road parking provision.

Full name: Nick Guildford

Organisation (where relevant): C G Fry & Son

Other party name (if relevant): Mr & Mrs Cowling

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: The requirement for 1 secure and under cover cycle space per bedroom for all dwelling types has the potential to impact on plot layout, potentially requiring larger plots, with cumulative effects across a larger scheme in terms of the ability to achieve the required level of housing. Equally, the blanket reference to garage spaces not counting towards car parking space quantum has land take implications. In other authorities garage spaces can be included subject to a minimum size threshold (internal dimension of 6m by 3m with 2.3m headroom that enables space for storage as well as parking of a car. Flexibility should be provided through the policy to enable such an approach. The viability implications of this have not been specifically assessed in the Three Dragons Viability Assessment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Any standard needs to be properly justified. Flexibility should be included in relation to inclusion of garages as parking spaces with reference to a minimum garage size as referred to.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C R Down Farming Ltd and Stuart Partners Ltd

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: The requirement for 1 secure and under cover cycle space per bedroom for all dwelling types has the potential to impact on plot layout, potentially requiring larger plots, with cumulative effects across a larger scheme in terms of the ability to achieve the required level of housing.

The viability implications of this have not been specifically assessed in the Three Dragons Viability Assessment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Any standard needs to be properly justified.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C G Fry & Son Ltd

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: The requirement for 1 secure and under cover cycle space per bedroom for all dwelling types has the potential to impact on plot layout, potentially requiring larger plots, with cumulative effects across a larger scheme in terms of the ability to achieve the required level of housing.

Equally, the blanket reference to garage spaces not counting towards car parking space quantum has land take implications. In other authority's garage spaces can be included subject to a minimum size threshold (internal dimension of 6m by 3m with 2.3m headroom that enables space for storage as well as parking of a car. Flexibility should be provided through the policy to enable such an approach.

The viability implications of this have not been specifically assessed in the Three Dragons Viability Assessment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Any standard needs to be properly justified.

Flexibility should be included in relation to inclusion of garages as parking spaces with reference to a minimum garage size as referred to.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): CR Down Farming Ltd and Stuart Partners Ltd

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: The requirement for 1 secure and under cover cycle space per bedroom for all dwelling types has the potential to impact on plot layout, potentially requiring larger plots, with cumulative effects across a larger scheme in terms of the ability to achieve the required level of housing. The viability implications of this have not been specifically assessed in the Three Dragons Viability Assessment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Any standard needs to be properly justified.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Cavanna Homes (Cavanna)

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: The requirement for 1 secure and under cover cycle space per bedroom for all dwelling types has the potential to impact on plot layout and site yield, potentially requiring larger plots or larger garages reducing garden space. The cumulative effects of this across a larger scheme could substantially reduce the ability to achieve the required level of housing. While Cavanna is not against adequate cycle storage on future developments, the implications of this policy requirement on site delivery need to be understood. Flexibility should be provided through the policy to take account of site constraints. The viability implications of this have not been specifically assessed in the Three Dragons Viability Assessment.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Any standard needs to be properly justified.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:

5.14 Draft Policy TR04 identifies the requirement for 1.7 car parking spaces per dwelling and 1 cycle space per bedroom in all residential development. 5.15 The Landowner supports the above policies and expects that development of the promotion site for around 150 dwellings will comply with all the requirements of the above.

Full name: Owen Jones

Organisation (where relevant): LRM Planning

Other party name (if relevant): David Wilson Homes

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: POLICY TR04 – PARKING STANDARDS

9.48 DWH is broadly supportive of emerging Policy TR04, which utilises the same residential car parking requirements contained within Policy 20 of the Cranbrook Plan, which were independently examined and found to be appropriate.

9.49 They do however note that garages will not count as parking provision. This again follows the parking standards set within Policy CB20 of the Cranbrook Plan. However, DWH note that despite this policy position, the Local Planning Authority insisted that Condition 39 was placed on planning permission 22/1532/MOUT, which requires any domestic garages provided within the Treasbeare Expansion Area to be kept free for the parking of motor vehicles and/or bicycles only. Consequently, there was a deliberate decision not to rigidly implement Policy CB20 of the Cranbrook Plan.

9.50 DWH also note that Policy TR04 seeks to ensure that all developments are provided with electric vehicle charging points. As set out in para. 11.22 of the emerging Plan, this is a matter that is covered by Building Regulations and therefore it is arguable that this element of the Policy does not serve a clear purpose as it duplicates the Building Regulations process. It is therefore not consistent with national planning policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It

will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Suggested changes
“In addition to the requirements of Part S of the Building Regulations, all new parking provision must provide provision of charging points to charge electric vehicles and electric bikes.”

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Due to the significant policy issues concerned.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: The Cherwell Group broadly supports emerging Policy TR04, which utilises the same residential car parking requirements contained within Policy 20 of the Cranbrook Plan, which were independently examined and found to be appropriate.

They do, however, note that garages will not count as parking provision. This again follows the parking standards set within Policy CB20 of the Cranbrook Plan. However, the Cherwell Group note that despite this policy position, the Local Planning Authority insisted that Condition 39 was placed on planning permission 22/1532/MOUT, which requires any domestic garages provided within the Treasbeare Expansion Area to be kept free for the parking of motor vehicles and/or bicycles only. Consequently, there was a deliberate decision not to rigidly implement Policy CB20 of the Cranbrook Plan.

The Cherwell Group also note that Policy TR04 seeks to ensure that all developments are provided with electric vehicle charging points. As set out in para. 11.22 of the emerging Plan, this is a matter that is covered by Building Regulations and therefore it is arguable that this element of the Policy does not serve a clear purpose and duplicates the Building Regulations process. It is therefore not consistent with national planning policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: SUGGESTED CHANGES

“In addition to the requirements of Part S of the Building Regulations, all new parking provision must provide provision of charging points to charge electric bikes.”

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Due to the significant policy issues concerned.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:

4.112. The average provision of 1.7 vehicle parking spaces per dwelling is consistent with the standards for other Districts within Devon. These standards may then be adjusted per dwelling depending on the number of bedrooms proposed but the total number should be consistent with that. Any reduction in terms of standards may need to see the provision of public transport within the site and the provision of frequent services reaching Exmouth Station and Exeter. This may need significant infrastructure improvements for buses to be able to access the site, stop and turn around, and bus operators may be reluctant.

4.113. These parking spaces would need to have a minimum number of EV Charging Spaces which is equal to the number of homes provided. A number of accessible spaces would also need to be provided.

4.114. The Regulation 19 Publication Draft states that employment parking standards should be complied with the standards stated. Any potential reduction in the number of spaces would depend on the land uses provided, while offices (for example) may be argued that nowadays generate less vehicle trips due to the opportunity for people to work from home, at least partially, other uses like retail may need to provide the total amount of spaces in compliance with these standards.

4.115. Bloor Homes support this policy save for the suggested amendments to the different forms of employment.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not legally compliant. Please be as precise as possible.: A supporting Statement has been submitted on behalf of Bloor Homes in respect of the Land to the South of Littleham, Exmouth. It has been submitted in respect of Policy SP01 but considers Policy TR04 and others.

2(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Please see Supporting Statement

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter fails to comply with the duty to cooperate. Please be as precise as possible.: Please see Supporting Statement

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: A supporting Statement has been submitted on behalf of Bloor Homes in respect of the Land to the South of Littleham, Exmouth. It has been submitted in respect of Policy SP01 but considers Policy HN02 and others

Full name: Sylvia Meller

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Parking in new developments should not be taking up even more space

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Parking spaces for new developments should be build underground to free up more space. Same for big parking lots which should be build as parking houses to reduce the area they are impacting. Existing parking lots of big businesses should be encouraged to build solar panel roofs over the parking space.

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Same as 3b and 3c

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Strategic Policy TR04 sets out minimum car parking standards for new development. Whilst we recognise that the policy wording permits the submission of evidence to demonstrate that a different provision is more appropriate, we have concern that minimum standards for selected uses could be considered high. The availability of parking is a significant factor influencing mode choice and is a key lever in the successful implementation of a vision-led approach.

TR05

Full name: Robert Barnes

Organisation (where relevant): Planning Prospects Ltd

Other party name (if relevant): Exeter and Devon Airport Ltd (EDAL)

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR05

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: The draft policy includes provisions around navigational systems but not the wider safeguarding requirements of the Airport.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The opening text of the third paragraph of the draft Policy should be amended to read, “Development that that could have an adverse impact on the operation or safety or navigational systems at the Airport or any safeguarding requirements of the Airport...”

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Exeter Airport is a facility of sub-regional importance and this policy is central to its future operation.

TR06

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR06

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.:

3.25 Policy TR06 sets out the requirement that all major developments have access to terrestrial or satellite superfast broadband and high-quality communications.

3.26 Policy TR06 is overly restrictive, especially for sites in smaller, isolated communities where practicality and viability are important considerations.

3.27 It is important to engage in discussions with developers to determine the practicality and feasibility of providing superfast broadband connections near the site, The consideration should depend on the size of the development and the costs associated with the additional works required.

Full name: Jemma Shorrock

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Persimmon Homes South West Limited

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR06

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Policy TR06 states that “planning permission for major developments, that will be used or occupied by people, will not be granted unless the scheme will have access to terrestrial or satellite superfast broadband and high-quality communications”. Whilst PHSW understand that EDDC support digital connectivity, we question whether this is justified.

The current policy wording has no flexibility for areas where superfast broadband and high-quality communications may not be available. As digital connectivity is in the control of strategic providers, and not in the control of the developer, Policy TR06 is therefore considered to be unreasonable and unjustified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy text should therefore be amended to provide flexibility and request that digital connectivity be provided on site in accordance with the current building regulations.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Taylor Wimpey Exeter

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR06

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: While the provision of digital connectivity to new developments is supported, the mandatory wording of the policy is too restrictive with no flexibility / acknowledgement that provision of digital connectivity is not in the control of developers. There is too much emphasis on the developer and instead should be focussed on them linking into wider plans to increase connectivity in their areas, where practical. As currently worded this policy could also create a prohibition on smaller rural schemes – it is entirely unrealistic to require such schemes to facilitate connections to isolated sites if providers do not have plans for those areas. A more sensible approach would be to ask developers for evidence about connectivity to superfast broadband in the vicinity of any site. Then discussions on whether it is practical and viable to facilitate www.carneysweeney.co.uk connections can then be had, and this would be dependent on size of development and costs of additional works.

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Policy should be reworded to require assessment and discussion but not mandating provision.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Owen Jones

Organisation (where relevant): LRM Planning

Other party name (if relevant): David Wilson Homes

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR06

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: POLICY TR06 – DIGITAL CONNECTIVITY

9.51 Policy TR06 of the emerging Local Plan requires major development that will be used or occupied by people, to have access to terrestrial or satellite superfast broadband and high-quality communications. As a matter of principle, this is unobjectionable and is supported by DWH. However, as stated within para. 11.30 of the emerging Local Plan, the requirements for gigabit ready physical infrastructure and, subject to a cost cap per dwelling, a connection to a gigabit-capable network, are established in Approved Document R of the Building Regulations.

9.52 Consequently, it is arguable that this element of the Policy does not serve a clear purpose and duplicates the Building Regulations process. It is therefore not consistent with national planning policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Suggested changes

9.53 The Policy should be deleted.

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Due to the significant policy issues concerned.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR06

2. Do you consider that this part of the Sustainable Transport and Communications chapter is legally compliant?: Yes

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: Policy TR06 of the emerging Local Plan requires major development that will be used or occupied by people, to have access to terrestrial or satellite superfast broadband and high-quality communications. As a matter of principle, this is unobjectionable and is supported by the Cherwell Group.

However, as stated within para. 11.30 of the emerging Local Plan, the requirements for gigabit ready physical infrastructure and, subject to a cost cap per dwelling, a connection to a gigabit-capable network are established in Approved Document R of the Building Regulations.

Consequently, it is arguable that this element of the Policy does not serve a clear purpose and duplicates the Building Regulations process. It is therefore not consistent with national planning policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: SUGGESTED CHANGES

The Policy should be deleted.

4. Do you consider that this part of the Sustainable Transport and Communications chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Due to the significant policy issues concerned.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR06

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: Digital Infrastructure for Remote Work (Strategic Policy TR06 & Broadclyst EW1)

- High-speed broadband and 5G coverage are a planning requirement to support remote work.
- Broadclyst's Policy EW1 facilitates the creation of rural work hubs, reducing commuting and boosting local employment.

TR07

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal: 11. Sustainable Transport and Communications

1. To which part of the Sustainable Transport and Communications chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR07

3(b). If no, please give details of why you consider this part of the Sustainable Transport and Communications chapter is not sound. Please be as precise as possible.: ‘...avoiding harm to landscape character, heritage, environment, and bio-diversity’ should be reworded to read ‘protecting and enhancing biodiversity’.

3(c). Please set out the modification(s) you consider necessary to make this part of the Sustainable Transport and Communications chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Sustainable Transport and Communications chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ‘...avoiding harm to landscape character, heritage, environment, and bio-diversity’ should be reworded to read ‘protecting and enhancing biodiversity’.