

Contents

4.1	3
4.4	15
4.25	16
WS01	18
WS02	233
WS03	235
WS04	236
WS05	238
WS06	242
WS07	255
WS08	259
WS09	265
WS10	302
WS11	330
WS12	366
WS13	367
WS15	372

Filtered Data Export

4.1

Full name: Dan Trundle

Organisation (where relevant): Black Box Planning Ltd

Other party name (if relevant): of Greenhayes (Greendale Group / Crealy Farms)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Paragraph

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

4.1

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

6.1 These Representations have been prepared by Black Box Planning on behalf of Greenhayes, comprised of Greendale Group and Crealy Farms, in response to the Pre-Submission (Regulation 19) consultation for the East Devon Local Plan 2020-2042 which runs between Thursday 13th February and Monday 31st March 2025.

6.2 Greenhayes is a strategic promotion for a new, thriving community which seeks to utilise and build on existing assets locally, such as the Greendale Farm Shop complex which already offers a range of services and facilities, taking advantage of the strong connections to significant employment hubs in the locality and the proposed expansion of the Clyst Valley Regional Park.

6.3 Greenhayes is identified within the emerging Plan evidence base as a reasonable alternative considered as part of the proposed delivery of a Second New Community. Greenhayes is supportive of a new community in the West End of the District. However, the Plan will require several modifications if it is to be concluded as sound.

6.4 The proposal is the vision of two local farming families, the Carter family (FWS Carter & Sons Ltd) and the Down family (Crealy Farms) who have been working comprehensively for several years to promote a carefully designed and sustainable new community to integrate into the established employment sites at Greendale Business Park, Greendale Farm Shop and Crealy Theme Park and Resort. There is a cogent case to incorporate it within the emerging Plan, but it has been excluded without detailed

rationale. This is in the context of a broad location for the new community which is not sufficiently evidenced at this stage.

6.5 The Greenhayes masterplan sets out an opportunity to deliver:

- A new, thriving rural community south of the A3052 Sidmouth Road potentially comprising of circa 2,000 no. homes (including both affordable and self-build and custom-build properties);
- A ready-made, thriving neighbourhood centre with an enhanced Farm Shop and café / restaurant at its core, together with a variety of supporting community services and facilities, such as retail, nursery and medical facilities;
- A new two-form entry 420-place primary school facility;
- A sustainable active travel corridor focused on the A3052 providing wheeling and walking connections into Exeter, Clyst Mary and into the proposed new community;
- Highway infrastructure improvements along the A3052 enabling access;
- Park and ride facility shared with Crealy visitor parking;
- Significant green infrastructure, providing strong recreational and biodiversity linkages into the Clyst Valley Regional Park project;
- Health and sports venue with playing pitches, gym, facilities and events venue;
- Rebalancing the resident to jobs ratio locally given the established and significant employment provision at Greendale and Hill Barton Business Parks and Crealy Theme Park and Resort already providing in the region of 3,600 no. jobs on the doorstep, meaning that place of work is located alongside place of residence, reducing the necessity for out-commuting;
- Increased renewable energy infrastructure, building on the 1.3MW anaerobic digestion plant already operated at Greendale Business Park.

6.6 The emerging Plan and this consultation have clearly been prepared to fall within the provisions of the Transitional Arrangements for Plan Making as set out in the December 2024 version of the NPPF at Annex 1: Implementation. However, it does not fully meet the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is also clear that, in accelerating the Local Plan timetable, to meet the Transitional Arrangements, there are several unresolved matters which, as acknowledged in the Plan, require a further consultation (in accordance with Regulation 19) and additional evidence to support it. These shortcomings go to the heart of the tests of soundness and should be available prior to consultation of a pre-submission Local Plan.

6.7 The Plan does not meet the Transitional Arrangements. It will be necessary to reconvene work on the emerging spatial strategy to incorporate sufficient development to meet the full objectively assessed needs of the area. This should be done alongside the full evidence base to assess the likely infrastructure requirements and amount of affordable housing the Plan will deliver necessary components to understand the deliverability of the strategy.

6.8 These Representations have set out matters in respect of soundness and legal compliance which require resolution prior to the Plan being advanced for submission to the Secretary of State for Examination.

6.9 If the Plan were submitted at this stage, it could not be concluded as being positively prepared, justified, effective or consistent with national policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.:

6.10 It has been set out that, in addressing serious issues of soundness, to meet identified housing needs that it would be entirely appropriate (and necessary to be sound) to identify the missing 2,000 homes at Greenhayes, immediately to the south of the current preferred location for the Second New Community. This would enable the community to come forward in accordance with the Government's New Town Programme, as well as aiding housing delivery within the Plan period in a sustainable manner.

6.11 Greenhayes would welcome further engagement with the Council to set out a Local Plan which is robust, with sustainable development at its heart. This also includes provisions relating to the CVRP.

Full name: Dan Trundle

Organisation (where relevant): Black Box Planning Ltd

Other party name (if relevant): of Greenhayes (Greendale Group / Crealy Farms)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Paragraph

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

4.1

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

1.1 These Representations have been prepared by Black Box Planning on behalf of “Greenhayes”, comprised of Greendale Group and Crealy Farms, in response to the Pre-Submission (Regulation 19) consultation for the East Devon Local Plan 2020-2042 which runs between Thursday 13th February and Monday 31st March 2025.

1.2 Greenhayes is a strategic promotion for a thriving new community which seeks to utilise and build on existing assets locally, such as the Greendale Farm Shop complex which already offers a range of services and facilities, taking advantage of the strong connections to significant employment hubs in the locality and the proposed expansion of the Clyst Valley Regional Park.

1.3 Greenhayes is identified within the emerging Plan evidence base as a reasonable alternative considered as part of the proposed delivery of a Second New Community. Greenhayes is supportive of a new community in the West End of the District. However, the Plan will require several modifications if it is to be concluded as sound.

1.4 The proposal is the vision of two local farming families, the Carter family (FWS Carter & Sons Ltd) and the Down family (Crealy Farms) who have been working comprehensively for several years to promote a carefully designed and sustainable new community to integrate into the established employment sites at Greendale Business Park, Greendale Farm Shop and Crealy Theme Park and Resort. There is a cogent case to incorporate it within the emerging Plan, but it has been excluded without detailed rationale. This is in the context of a broad location for the new community which is not sufficiently evidenced at this stage.

1.5 The Greenhayes masterplan sets out an opportunity to deliver:

- A new, thriving community south of the A3052 Sidmouth Road potentially comprising of circa 2,000 no. homes (including both affordable and self-build and custom-build properties);
- A ready-made, thriving neighbourhood centre with an enhanced Farm Shop and café / restaurant at its core, together with a variety of supporting community services and facilities, such as retail, nursery and medical facilities;
- A new two-form entry 420-place primary school facility;
- A sustainable active travel corridor focused on the A3052 providing wheeling and walking connections into Exeter, Clyst Mary and into the proposed new community;
- Highway infrastructure improvements along the A3052 enabling access;
- Park and ride facility shared with Crealy visitor parking;
- Significant green infrastructure, providing strong recreational and biodiversity linkages into the Clyst Valley Regional Park project;
- Health and sports venue with playing pitches, gym, facilities and events venue;
- Rebalancing the resident to jobs ratio locally given the established and significant employment provision at Greendale and Hill Barton Business Parks and Crealy Theme Park and Resort already providing in the region of 3,600 no. jobs on the doorstep, meaning that place of work is located alongside place of residence, reducing the necessity for out-commuting;
- Increased renewable energy infrastructure, building on the 1.3MW anaerobic digestion plant already operated at Greendale Business Park.

1.6 The emerging Plan and this consultation have clearly been prepared to fall within the provisions of the Transitional Arrangements for Plan Making as set out in the December 2024 version of the NPPF at Annex 1: Implementation. However, it does not fully meet the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is also clear that, in accelerating the Local Plan timetable, to meet the Transitional Arrangements, there are several unresolved matters which, as acknowledged in the Plan, require a further consultation (in accordance with Regulation 19) and additional evidence to support it. These shortcomings go to the heart of the tests of soundness and should be available prior to consultation of a pre-submission Local Plan.

1.7 These Representations set out matters in respect of soundness and legal compliance which require resolution prior to the Plan being advanced for submission to the Secretary of State for Examination.

1.8 It will be set out that, in addressing serious issues of soundness, to meet identified housing needs that it would be entirely appropriate (and necessary to be sound) to identify the missing 2,000 homes at Greenhayes, immediately to the south of the current preferred location for the Second New Community. This would enable the community to come forward in accordance with the Government's New Town Programme, as well as aiding housing delivery within the Plan period in a sustainable manner.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMLIII Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Paragraph

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

4.1

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Strategic Policies WS01-WS15 allocate land for development at the West End but the land which Eagle One MMLIII Ltd owns at Tithebarn Way, Exeter (HELAA Site Brcl_25) is omitted from the sites which are proposed to be allocated. The site was granted a renewed outline permission (Ref: 21/3148/MOUT) in 2023 for employment development and is actively being marketed. Both of these factors clearly demonstrate that it is, contrary to the Council's site sifting assessment (Housing and Economic Land Availability Assessment (HELAA) Appendix F (iii) Sites submitted in response to the 2022 call for sites) available for employment development and it should, at the very least, be allocated for that use within the draft local plan. However, there has not as yet been viable occupier interest in developing the site for employment purposes and because it is also in a suitable location for housing, in accordance with the NPPF, consideration should be given to whether it should be identified in the draft local plan as a site to help meet the more substantial housing requirements of the district. To rule this out, as appears to have happened within the site sifting report, solely on airport noise issues does not seem reasonable or justified when the site adjoins land which is being developed for over a thousand other houses with appropriate infrastructure, including a new school, local centre, sports pitches, etc, now also being delivered. Eagle One is a South West based private property development and investment company with it's head office located at Exeter Science Park (within 350 m from the site). The company retains a substantial commercial investment portfolio including office buildings in Exeter, Plymouth, Bath and Bristol with the majority of the portfolio comprising properties that have been built by the company over its 40 year existence. This site has been within Eagle One ownership since 2003. The focus for the company has been to develop the site for the consented office use and retain it within their portfolio. Eagle One have made extensive efforts to bring forward the development, including:

- Property agents initially appointed in 2015 –a mix of local and regional firms of surveyors with specialism in offices
- Web-site set up in 2015
- High profile marketing board on site since Jan 2016
- Computer generated images produced
- Dedicated financial and scheme proposals made to occupiers
- Renewed outline planning application for offices submitted in 2021 More than £175,000 has been spent on marketing and planning (not including the original outline permission) specifically to promote office use for this site, excluding infrastructure costs. Eagle One has engaged with numerous occupiers over the marketing period but despite their best efforts have been unable to secure an occupier. The site has been serviced since completion of the Tithebarn Link Road final phase in 2018. Eagle One's commitment to trying to deliver office development on the site is emphasised by the effort and cost put into the planning process. They are very experienced in delivering commercial development across all sectors. However, since the Covid pandemic there has been a major change in demand for office space with a shift towards working from home. This has had a significant impact on office investment values, which together with the increase in build costs has meant that office development in this location is no longer viable. This is a view supported by the Council's Economic Development Officer. Furthermore, the Council's Economic Development Needs Assessment report of January 2023 also identifies an oversupply of 'office sites' with an expected demand in the period 2020-2040 of 2-14ha (page 65) against a supply (page 66) of 16-41ha. Planning permission (LPA ref: 21/3235/MFUL) was granted in January 2024 for the construction of 44 dwellings on land which adjoins the site to the east as shown on the approved layout plan set out below [see email submission for layout plan]. This means that Eagle One's land at Tithebarn Way, Exeter (HELAA Site Brcl_25) is now bordered by consented housing to the east and north. Tithebarn Way/Anning Road borders it to the west while Honiton Road borders it to the south. It is eminently suitable for housing development and clearly in a highly sustainable location. Paragraph 127 of the NPPF states that planning policies and decisions need to reflect changes in the demand for land and be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of development coming forward for its identified use it should reallocate the land for a more deliverable use that can help to address identified needs. In light of the very substantial housing need now identified under the standard method, published on 12 December 2024 and the significant implications identified above arising from Council's decision to only plan for 80% of that need, including the requirement for the plan to have a very significant update within five years of adoption

and the Council needing to demonstrate a six year housing land supply for the purposes of decision making almost from the point of adoption, the Council's reasons for dismissing this site and its omission as a housing allocation means that the draft plan is not Positively prepared, Justified, Effective or Consistent with national policy and fails all four of the tests of soundness. We therefore object to its omission as a site allocation on this basis.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Eagle One's land at Tithebarn Way, Exeter (HELAA Site Brcl_25) is available for development and within a highly sustainable location for housing. It is also of a size that would mean it could be developed quickly and would be capable of forming part of the Council's five-year housing supply. It should be allocated for housing within the draft Plan.

Full name: Nick Matthews

Organisation (where relevant): Savills

Other party name (if relevant): FWS Carter and Sons

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Paragraph

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

4.1

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please refer to the supporting representations attached to this response.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 refer to the supporting representations attached to this response.

4. Do you consider that this part of the Development at the West End 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.: FWS Carter and Sons, as the owner of Greendale Business Park, is a significant landowner and employer within East Devon and is capable of delivering significant development to address the needs and aims identified within the draft Local Plan.

Full name: Andrew Sly

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Paragraph

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

4.1

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: It's not sound because local residents are having to suffer because of the increased traffic, disruption & at the moment the roads cannot cope at peak times.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Cancel the redevelopments as the community will be over saturated.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There are too many homes being built & the infrastructure cannot cope-sewage & water.

4.4

Organisation (where relevant): Carden Group

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Paragraph

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

4.4

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The Site

6.1 As previously mentioned, we believe the Local Plan does not provide a sufficiently flexible supply of housing land. To meet identified housing needs in a sustainable location, we propose that our site that is situated south of the approved Treasbeare Farm development and covers approximately 60 acres (see outline below) to the south of Cranbrook should be allocated for housing.

6.2 The site consists of arable land and grassland pasture, enclosed by a network of hedgerows and trees. At its centre lies the Treasbeare Farmstead, which includes several deteriorating buildings covering approximately 4 acres of the site.

Housing and Economic Land Availability Assessment (HELAA) (2022) – Site Reference GH/ED/02

6.3 In the latest HELAA, the Council rightly concluded that the site, along with the area which is now approved for housing, is suitable for both housing and employment uses.

4.25

Full name: Helen Leggett

Organisation (where relevant): Emery Planning

Other party name (if relevant): Oxenwood Real Estate LLP

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Paragraph

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

4.25

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.: N/A

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:
N/A

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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.: N/A

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: N/A

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The supporting text to Policy WS06 at paragraph 4.25 is not sufficiently clear to ensure the delivery of the aims of the Policy. The wording as drafted provides a degree of ambiguity

and therefore fails the test of effectiveness. Please see Emery Planning's supporting letter - EP ref: 21-040 – LPR R19.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 a minor amendment to the text at paragraph 4.25 would significantly increase its clarity and serve to ensure that the Plan is effective and sound. Please see Emery Planning's supporting letter - EP ref: 21-040 – LPR R19.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.: N/A

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: N/A

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)

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

WS01

Full name: Martin Thurgood

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Only large-scale development provides for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Development at the West End should be given priority, should be of such a scale that most other 'edge of communities' housing development is unnecessary, should be of class-beating standard (such as demonstrated by the Cornish Nansledan development) and should be commenced without delay.

Full name: Ben Ingham

Organisation (where relevant): EDDC

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: I believe the process used to identify growth rates is flawed. The second new community could be developed much faster (700 dwellings per annum), embracing sustainability and coherent infrastructure. If this was done, fewer dwellings would be needed in other communities where the infrastructure is already exhausted and will become harm communities.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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.: The Strategic Planning Committee were not allowed to discuss the overall aim of the eEDLP before debating and formulating policy. This meant officers controlled the outcomes with negligible input from councillors. Primarily, the committee were a tick box exercise following an officer generated checklist.

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Councillors were forced down a bias journey only identify limited build out of a second community and excessive development at communities with weak and outdated infrastructure. This fails existing communities and misses the chance fast track the second new community and other adjacent large new developments (1500 dwellings) that could start tomorrow.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Reject the eEDLP. Instruct EDDC to: Revisit second community roll out, adjacent large sites for potential development, THEN consider other sites. They did the opposite. Contrived.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Officer led strategic thinking with contrived objectives, therefore not really democratic or a reflection of public opinion.

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.: Yes

Full name: Andrew McKeon

Organisation (where relevant): EXETER CIVIC SOCIETY

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Exeter Civic Society objects to the proposed allocation of land for a new community in East Devon and at Exmouth and Topsham on the grounds that the implications for the road network and infrastructure development have not been properly considered and the plan is therefore unsound in respect of these proposals. We are making this objection because of the levels of the current levels of congestion on roads in Exeter at peak times, and the increasing number of vehicles on the Strategic Road Network around the city. In addition, it is clear from current traffic movements that there is already a significant increase in traffic leaving and returning to the city at peak times to workplaces outside of the city; possibly at Skypark, Hill Barton and Greendale Industrial Parks. We expect this trend to continue. It is unsound because: The assessment of transport impacts was modelled on a previous draft plan. The updated modelling in December 2024 noted that the final plan may be different. It is indeed, with increases of 25% for the new town albeit over a longer timescale and of 30% for Exmouth. These will have a significant impact and should be modelled and considered before the plan is finalised and considered sound. The updated December 2024 modelling notes: 'In 2040 many of the junctions in Exeter show an increased V/C ratio due to higher traffic flows on the network. There are some junctions which were already over-capacity in 2017 and/or 2030 and remain so in the future years, but others which were below capacity and now have at least one turn that is over-capacity. For example, several SRN junctions between the A30 airport junction, M5 J29 and M5 J30 had worst turn V/C ratios below 95% in 2030 that go over 95% in 2040. Junctions that were already over-capacity in 2030 and get worse in 2040 include Clyst St Mary roundabout, Clyst St George roundabout, and the A38 northbound approach to M5 J31.' The further housing development proposed will

exacerbate this but no assessment has been made. Prime access to the North of Topsham site will be along Clyst Road. This is a narrow road with a traffic light controlled junction to the A376 near to J30 of the M5. The plan suggests making a cycle route and/or a bus route along it but the feasibility and cost of doing so needs to be assessed first before the allocation can be made as local knowledge suggests the likelihood of doing so is negligible. Strategic Policy WS10 proposes that EDDC and Exeter City Council will work jointly on infrastructure and traffic mitigation matters, specifically in relation to the M5 J 30 roundabout. It is not clear whether this includes the Clyst Road/A376 junction, but that should specifically be referenced and included in the policy. Also, there is no reference to changes to the junction in the Infrastructure Delivery Plan. They need to be included as Priority 1. The A376 from Exmouth to Exeter is known to be heavily congested at peak times - a point made by Devon County Council in earlier consultations. This has been omitted from the S19 version of the plan but is even more relevant given the extra housing proposed. There is little practical prospect of a bus priority route, given the nature of the A376 from the town to the M5 and Exeter, passing through many villages including the congested roads within Topsham. There are no proposals to improve the railway line other than enhancements to specific stations. Devon County Council's November 2020 Exeter Transport Strategy is now over five years old and is half way through. It cannot be considered reliable evidence at this point without updating and going further to 2035 or beyond. A number of the schemes listed as completed by March 2025 have been significantly reduced in scope because of public objections, so their likely impact is much reduced. Given the track record in significantly modifying and reducing the impact of such schemes in light of public opinion, the proposed future schemes and their mitigating effect need to be reassessed for the plan to be sound. The November 2020 Transport Strategy notes that much of the impact of additional traffic in and on Exeter has been effectively absorbed by Exeter residents changing their travel habits (Para 3.3). There is diminishing scope for this. 80% of commuting journeys from towns outside Exeter are by car, from rural areas it is 90%. It also notes that 'existing (i.e. 2020) transport networks [are] already at capacity in peak periods' (Para 3.20) It notes but makes no specific assessment of the impact of Cranbrook, other than that it will grow to the size of Tiverton, and its highways will become congested. Better quantification of travel habits and impact of Cranbrook residents would better inform the S19 Plan and its soundness. The proposed new town (and to a lesser extent the other housing developments down the Exe Estuary and including Exmouth) might reasonably be expected to have similar impacts to Cranbrook. The empirical data informing the strategy is also over 7 years old and indeed makes use of the 2011 census which has been superseded by the 2021 census. It is therefore unreliable and unsound to base a plan on such out-of-date data. The impact of Cranbrook and of the proposed developments on Exeter to be reassessed using more up-to-date data before the plan is approved. The Infrastructure Delivery Plan includes significant rail developments to make EDDC's S19 plan workable in respect of

sustainable travel and its likely impact on the road network and Exeter. However, there are no costings or commitment from Network Rail. It is unclear where these proposed developments stand and whether they now feature in Network Rail's business plans. This needs to be clarified positively before the plan can be considered sound. The WSP Mitigation Modelling dated 9 December 2024 cites the possibility of four P&R sites, and whilst that at Peamore has planning approval, those at Markham and EDNC North and EDNC South have not been consulted upon. Indeed, the proposal by the highway authority for a P&R site at the A30 Ide interchange has previously been proposed by them but did not succeed because of public objection and an inability to demonstrate that a bus link would be effective on the already congested Alphington Road. As for the two proposed in East Devon, the EDNC South site is unlikely to be effective at peak times because the A3052 and Clyst St Mary roundabout are already congested. Although improvements for the highway at the A3052/A376 roundabout is highlighted in chapter 11 of The Plan, the Infrastructure Delivery Plan does not include any works to improve this route to the M5/Exeter. The Infrastructure Delivery Plan also includes significant development by South West Water (SWW) on a new sewage treatment plant for the new town and development of the one at Countess Wear. Since the IDP was prepared Ofwat has determined a significantly lower price increase to support SWW's business plan than the company sought. The continued inclusion of these items in SWW's business plan needs to be settled before EDDC's own plan and the allocations it provides can be approved.

4. Do you consider that this part of the Development at the West End 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.: The transport and traffic consequences of the proposals at the West End (and Exmouth) are very significant, have been inadequately considered and deserve greater analysis and assessment.

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Good to try and change people's behaviours and reliance on cars. The new settlement should have some form of access to a railway station, so as not to be reliant on cars, and add to existing problems of congestion and pollution around Exeter and M5.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Minerals and Waste Planning In regard to Policy WS01, the southern end of the proposed second new community sits within the Waste Consultation Zone (WCZ) of Hill Barton which has a number of important existing and permitted waste uses. The county council recommends that less sensitive uses should be located within the WCZ or suitable mitigation measures should be provided in order to ensure the continued availability of adequate capacity at the waste sites in Hill Barton in accordance with Policy W10 (Protection of Waste Management Capacity) of the Devon Waste Plan. Further comments on this are provided below in Appendix 1 including the additional wording which is requested is added to Policy WS01 and its justification. As mentioned above, due to the location of the proposed second new community, as identified in Policy WS01, in relation to the Waste Consultation Zone (WCZ) of Hill Barton, the county council requests that a new paragraph is added to the justification for Policy WS01 (after paragraph 4.8) to clarify the importance of the waste management facilities at Hill Barton, with wording as follows: “The Waste Consultation Zone (WCZ) of Hill Barton has a number of important existing and permitted waste uses including a permitted energy recovery capacity of 80,000 tonnes as supported by Policy W6 (Energy Recovery) of the Devon Waste Plan. Proposed development within the Waste Consultation Zone should therefore be brought forward in consultation with the waste planning authority in accordance with Policy W10 of the Devon Waste Plan.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: It should be noted that Devon County Council may not be able to forward fund the infrastructure requirements of the second new community during the plan period.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: In respect of the second new community, the response to this consultation is based on the planned delivery of 3,300 dwellings during the plan period (2020 – 2042) and a total of 8,000 dwellings once complete. The county council recognises the longer term plan which would see the community grow to 10,000 dwellings and can provide a detailed response on the total education infrastructure requirements for the second new community upon request. The location of the new community means that the infrastructure planning needs to take into account the wider infrastructure needs of the plan. This has been detailed in the IDP, which outlines all education infrastructure requirements for the plan period (2020 – 2042), and will support the masterplan development. Provision for children and young people is considered critical for the delivery of the plan. Devon County Council and East Devon District Council have successfully delivered education infrastructure early in Cranbrook which has supported the new town to grow, including a new primary and an education campus and timing of delivery in the second new community will be a key consideration for successful delivery. 23 hectares of land has been identified for education provision in the new community based on 8,000 dwellings. It should be noted that additional education land and infrastructure is required to accommodate an additional 2,000 homes at the second new community. DCC will provide further detail on this matter as part of the second Regulation 19 consultation following further collaboration with the district council. The re-evaluation of land requirements for the second new community will also need to ensure there is sufficient land to provide for the wider aspirations of the plan as required.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: Adult Social Care Devon County Council supports the inclusion of Policy HN03 ‘Housing to meet the needs of older people’. DCC considers the policy enables extra care housing to be secured through development proposals and addresses the necessary points that DCC suggested in its response to the Draft Local Plan in January 2023. Additionally, the county council supports the inclusion of six extra care housing schemes at existing towns across the district in the IDP. DCC requests that Policy WS01 is amended to include reference to provision of a 70-unit extra care housing scheme and residential care home accommodation within the second new community in line with the requirements of Policy HN03, as detailed in Appendix 1. The county council requests that the following wording is added under the ‘New homes’ heading in Policy WS01 to ensure the provision of extra care housing and residential care home accommodation in line with the requirements of Policy HN03: “D. a 70-unit extra care housing scheme on 0.8 hectares in accordance with Policy HN03; and E. residential care home accommodation in accordance with Policy HN03.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Minerals and Waste Planning In regard to Policy WS01, the southern end of the proposed second new community sits within the Waste Consultation Zone (WCZ) of Hill Barton which has a number of important existing and permitted waste uses. The county council recommends that less sensitive uses should be located within the WCZ or suitable mitigation measures should be provided in order to ensure the continued availability of adequate capacity at the waste sites in Hill Barton in accordance with Policy W10 (Protection of Waste Management Capacity) of the Devon Waste Plan. Further comments on this are provided below in Appendix 1 including the additional wording which is requested is added to Policy WS01 and its justification. The southern end of the proposed site for the new community sits within the Waste Consultation Zone (WCZ) of Hill Barton which has a number of important existing and permitted waste uses including a permitted energy recovery capacity of 80,000 tonnes as supported by Policy W6 (Energy Recovery) of the Devon Waste Plan. It is noted that Policy WS01 includes a new waste transfer station. DCC considers that this facility is well-suited to the Hill Barton location but it will have an impact on future amenity as the facility will have its own WCZ. The county council recommends that less sensitive uses should be located within the WCZ or suitable mitigation measures should be provided in order to ensure the continued availability of adequate capacity at the waste sites in Hill Barton in accordance with Policy W10 of the Devon Waste Plan. Therefore, DCC requests that the following wording is added to Policy WS01 (at the end of the third paragraph on page 50) to ensure reference to the Devon Waste Plan: “Proposed development within the Waste Consultation Zone should be brought forward in consultation with the waste planning authority in accordance with Policy W10 of the Devon Waste Plan.” In addition, DCC requests the following wording is added to the Waste transfer station section on page 54: “The development is to include a new waste transfer station that is to be completed and capable of operation. Development within the Waste Consultation Zone for the new Waste Transfer Station should be considered in accordance with Policy W10 of the Devon Waste Plan.”

Full name: George Marshall

Organisation (where relevant): Exeter City Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: Second new community The City Council notes the significant emphasis placed on the allocation of the second new community in East Devon, to the east of Exeter, to meet housing needs. Allocating a considerable area will facilitate a Comprehensive approach to development delivery. It is vital that the second new community provides for a mix of uses and significant infrastructure to enable sustainable, healthy lifestyles, to mitigate development impact and complement the role and function of Exeter. The City Council has been involved as a stakeholder in the preparation of evidence and master planning to underpin the second new community and looks forward to continuing to input to this process in future.

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: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: Please see attached representations.

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.: To be able to address queries in relation the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: WS01 is sound.

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: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Dorepark Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: Please see attached representations.

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.: To have the opportunity to discuss matters which are relevance to the delivery of the Council's housing supply and spatial strategy.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr and Mrs Feast

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 refer to the attached sheet.

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:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Vistry do not dispute the allocation of a further new town on the edge of Exeter, and it is agreed that the Western edge of East Devon is a sustainable location for development, meeting housing need close to jobs and services at Exeter.

Whilst we do not contend with the strategy to include a further new town within the Draft LP, we have significant concerns as to whether such a development can deliver 3,300 dwellings within the Draft LP period and commence housing delivery by 2030 (as proposed within the Council's housing trajectory).

It is noted that the Policy WS01 states that the new community “will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis”. The policy proceeds to reference the requirement for a “allocation-wide Masterplan”, which will set out the affordable housing provision across the entire allocation and housing tenure and densities. By the end of the Draft Plan period, the Site will need to include a 5-hectare completed and operational town centre.

However, the Draft LP fails to confirm how the developments shall be delivered in a phased and co-ordinated manner. It is our assumption that this will be secured via a Development Plan Document (DPD).

A DPD cannot be adopted in advance of the Draft LP to which it relates and arguably, for the DPD to be effective, planning applications relating to the new town should not be submitted in advance of the DPD being adopted.

Even after the adoption of a DPD, as set out within our response to Strategic Policy SP02, there are significant lag times associated with housing delivery in large allocations.

It is not considered realistic that the new settlement could deliver housing by 2030.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: For this policy to be effective and, therefore sound, the quantum of development proposed through the new town in this Draft LP should be reduced to reflect a more justified delivery figure; and additional housing sites allocated across East Devon to ensure the housing requirement is fulfilled and the consistent delivery of homes throughout the Draft LP period.

Land at Addlepool Farm should be included as an allocation. The proposed scheme aligns with the Council's overarching principles of delivering development in accordance with the 20-minute neighbourhood concept, whereby key facilities and services are within a 20-minute distance using public transport, walking or cycling.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

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

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

2.46 We have significant concerns regarding the Plan's delivery assumptions for the new settlement. In particular, the effectiveness of the Plan given its over-reliance on the new settlement delivering 3,300 homes between 2030 and 2042.

2.47 This consultation document does not contain evidence to justify the delivery rates proposed for the allocation of the new settlement. It is noted that the Council intend to do a further Regulation 19 consultation later in 2025, at which time they hope to identify evidence to support the allocation's delivery rates. Given the current absence of evidence Policy WS01 is not justified and unsound.

2.48 Research undertaken by Litchfields 'Start to Finish' provides such empirical evidence for considering housing delivery in the context of preparing local plans. The research demonstrates that:

- the average timeframe for sites of 2,000+ homes from validation of a first planning application to the completion of the first dwelling is 6.6 years;
- the average lower to upper quartile range for build-out rates for sites of 2,000+ homes is 100 to 188 dpa; and
- looking ahead, the OBR's forecasted drop in housing transactions and worsening market conditions will likely lead to a reduction in build out rates over the beginning of the plan period.

2.49 It is highly unlikely that the new settlement would be started in 2030, and Policy WS01 is ineffective and unsound. We say this because prior to the preparation and

determination of any future planning application significant work is required, inter alia, to:

- Undertake masterplanning work, public consultation and community involvement. Draft Policy WS01 proposes that the new community “will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis”. The policy proceeds to reference the requirement for a “allocation-wide Masterplan”, which will set out the affordable housing provision across the entire allocation and housing tenure and densities.
 - Scope and coordinate the delivery of significant supporting infrastructure, including the construction of an operational, 5-hectare town centre.
 - It is assumed that a Development Plan Document (DPD) will need to be prepared to ensure the allocation is delivered in a coordinated manner. To prevent abortive work, it is anticipated that the DPD would not be prepared until the draft LP had been adopted. It is noted that the Cranbrook DPD was not adopted until October 2022, despite the LP having been adopted more than 6 years prior in 2016.
-
- Planning applications would be prepared and submitted following the adoption of the DPD to ensure they can demonstrate consistency with the approved masterplan. Noting the scale of the site, it is likely that any future application would proceed in Outline and would be considered as EIA development, therefore requiring additional assessments to be undertaken as part of the application preparation process, and an associated elongated determination timescale.

2.50 On this basis, a more realistic timeframe would be:

- 2025/26 - Adoption of the Local Plan
- 2026/27 – Consultation and approval of “Whole New Community Masterplan”

- 2028/30 – Preparation of Development Plan Document
- 2031 - Preparation and submission of outline planning application and EIA
- 2037 - Planning Committee resolution to grant and s106 agreement signed to allow planning permission to be issued and the first completion in 2036
- 2037 – 2042 - An average build-out rate of 120 dpa from 2036 to 2042 delivering 600 homes before the end of the Plan period.

2.51 This would leave 2,700 homes short of meeting the Plan’s housing requirement.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.:

2.52 For this policy to be effective and therefore sound, the quantum of development proposed through the new town must be reduced to reflect a justified housing delivery figure; and additional housing sites allocated across East Devon to ensure the Plan’s housing requirement is met by 2042.

2.53 Land off Northcote Hill, Honiton (south of the railway line) should be allocated to deliver 285- 300 homes, which would ensure the development can make a meaningful contribution towards EDDC’s housing land supply in the short to medium term, allowing for any unforeseen delays in housing delivery within the new settlement. By increasing the proposed allocation on Land off Northcote Hill, Honiton (south of the railway line), this will ensure that the allocation makes the most effective use of land, in accordance with national policy and guidance.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

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

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End 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 overall aim of Policy WS01 is acknowledged. However, there is at present no delivery model for the development and as such there is no evidence against which an assessment of the viability and deliverability of the second new community can be undertaken. This therefore casts some doubts on how quickly the site would be able to come forward. It follows that the claim that it will deliver “around” 3,300 new homes by 2042 cannot be evidenced.

These uncertainties offer very little confidence that the second new community will achieve what is required of it in the timescales needed to meet development needs. This is in the context of District that is subject to significant development pressures – arising from within the District and Exeter City - is heavily constrained in environmental terms and where political continuity at a national level cannot be guaranteed by virtue of potential local government reorganisation.

It is considered that the draft EDLP should also and plan for and consult on the approach to delivering the additional 2,000 new homes proposed at the second new community, rather than delaying the decision to a future local plan. To do this, it will be necessary for the draft LP to take a longer-term view of the delivery of the second new community in accordance with the Framework, by extending the plan period.

Uncertainties remain over the approach, procedures and timescales for future consultation on the second new community in the summer of 2025 and the effect of this on the submission of a comprehensive draft EDLP for examination and its ultimate adoption.

DRAFT EXETER CITY PLAN (REG 19)

We made representations on the draft Exeter Plan during formal consultation (which ended on 06 February 2025 and which is running neck and neck with the draft EDLP). These representations asserted that in the context of significant under-delivery against the adopted Local Plan requirement (as noted above, around 2,400 homes), the draft Exeter Plan would not deliver the homes required of it and that it had failed to engage with East Devon District Council (EDDC) under the Duty to Co-operate to explore the ability of unmet need in Exeter to be met in East Devon District. We further asserted that the best place to meet this need would be the West End for the very reasons acknowledged by the draft East Devon LP.

It is considered a further strategic site allocation is needed in the West End to provide the flexibility needed to account for the uncertainties around viability and deliverability of the second new community, the likelihood of having to meet need in the West End arising in Exeter City Council's administrative area that cannot be met there and shortfalls in housing delivery on allocated sites elsewhere in the District.

Our client is promoting land for a sustainable strategic scale mixed-use development to the south of the second new community between the A3052 and the A376, that is unconstrained in land ownership, environmental and infrastructure terms and could come forward quickly.

This site was considered by the Council as part of the site appraisal process for the second new community (GEV-003). The site being promoted by our clients (Option 3) was scored at 37.4. The selected site (Option 1) scored at 38.3. The main difference between the overall scoring (0.9) was because at the time, the Option 3 site was larger and controlled by multiple landowners, none of whom were contractually bound. The site is now smaller and controlled by three landowners who are contractually bound to promote the development.

The proposals could deliver up to 2,000 new homes, together with a local centre and a range of complementary uses, services and facilities to optimise self-containment, with a focus on active travel connections to employment, leisure and retail destinations. The Vision Statement accompanying these representations provides further detail on the proposals.

THE EFFECT OF DRAFT EDLP POLICIES ON HOUSING DELIVERY AND DEVELOPMENT VIABILITY

As can be seen from our tabulated representations, it is our view that the cumulative (and often individual) effect of numerous draft EDLP policies will be to delay and restrict the delivery the number of new homes on allocated sites. Development viability will also become challenging, which will in turn impact on affordable housing delivery.

This will create growing pressure to release more land for development in order to maintain housing land supply and to meet at least 80% of the identified need, undermining the plan-led approach to delivering new homes and jobs.

As a result, it is considered that the draft EDLP should address this by allocating more land for development, including land for a further sustainable self-contained strategic-scale development in addition to land for a second new community.

As noted above, our clients are promoting a site for such a development in the West End, which the Council acknowledges at paragraph 3.4.1 of the draft EDLP to be an appropriate location to accommodate major new development.

A Vision Statement accompanies these representations. This document is based on detailed technical analysis, including a “Vision-led” transport and access appraisal, a full season of ecology surveys, landscape assessment, arboricultural assessment and a flood risk and surface water drainage assessment. It presents a full constraints and opportunities analysis that culminates in a draft Illustrative Masterplan and land use plan.

SUMMARY

CarneySweeney submits representations on behalf of CR Down Farming Ltd and Stuart Partners Ltd.

We identify legal and procedural challenges with the Council's approach to plan preparation. These relate to:

- The approach to planning to meet up to 80% of need rather than the entire need or at least 80% of the need.
- Splitting the plan into two parts, with a Regulation 19 consultation on the one part of the plan and a future Regulation 18 consultation on the other part, which relates to a second new community which will be the central plank of the Council's future housing delivery strategy.
- The second new community consultation assuming that the only option for delivering a strategic sustainable new development to meet housing need is via the Council's preferred option site between the A30 and the A3052. It is an option but not the only one. The option being promoted by our client would complement the second new community rather than prejudicing it.

There are also a number of policies that impose technical and other standards that while entirely laudable, have not been properly evidenced or justified and as such are, in themselves, unsound. Furthermore, it is the cumulative (and often individual) effect of these policies (including those listed below) on scheme viability and overall deliverability that is of significant concern. These include:

- 20% BNG (Policy PB05)

- 110 litres per day restriction (Policy AR02)
- First Homes Standard (Policy CC02)
- BREAM “Excellent” for all non-residential development (Policy CC02)
- Design Code for all major development (Policy DS02)
- Housing design standards (Policy HN04)
- 5% custom and self build (Policy HN05)
- Public open space standards (Policy OS02)
- Bond of 25% of the cost of landscaping (Policy PB09)

A number of other policies introduce policy, procedural requirements and new standards that are not consistent with those in the Framework and PPG. It is considered that these will delay the submission and determination of planning applications and ultimately delay housing delivery.

As a result, the draft EDLP will delay and restrict housing delivery, such that the allocated sites will not meet the needs identified and the ability of windfall sites to “step in” to meet the shortfall are equally restricted in policy terms.

It has not been demonstrated that the second new community will deliver as the draft EDLP claims and the Council’s experience of the delivery timeline for Cranbrook (30 + years and counting) underlines the challenges that lie ahead. Furthermore, it is considered that the draft EDLP has failed to allocate enough sites to meet local need in full or to have planned positively to meet at least 80% of this need. This suggests strongly that the draft EDLP should either be paused to enable the second new community plans to “catch up” so that the whole draft LP can be considered comprehensively as one, or that more sites should be allocated at this stage to provide sufficient headroom for the significant uncertainties inherent in the draft EDLP.

Our clients are promoting land in the West End to the south of the 2nd new community for a self-contained residential-led, sustainable new village that is viable, sustainable and does not require external funding. It could come forward quickly and would eventually form part of and compliment (rather than prejudice delivery of) the second new community. It is considered that this land should be allocated in the draft EDLP.

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.: We ask to be kept informed of next stages of consultation and also that we have an opportunity to participate in any public examination of this document.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

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

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The overall aim of Policy WS01 is acknowledged. However, there is at present no delivery model for the development and as such there is no evidence against which an assessment of the viability and deliverability of the second new community can be undertaken. This therefore casts some doubts on how quickly the site would be able to come forward. It follows that the claim that it will deliver “around” 3,300 new homes by 2042 cannot be evidenced.

These uncertainties offer very little confidence that the second new community will achieve what is required of it in the timescales needed to meet development needs. This is in the context of District that is subject to significant development pressures – arising from within the District and Exeter City - is heavily constrained in environmental terms and where political continuity at a national level cannot be guaranteed by virtue of potential local government reorganisation.

It is considered that the draft EDLP should also and plan for and consult on the approach to delivering the additional 2,000 new homes proposed at the second new community, rather than delaying the decision to a future local plan. To do this, it will be necessary for the draft LP to take a longer-term view of the delivery of the second new community in accordance with the Framework, by extending the plan period.

Uncertainties remain over the approach, procedures and timescales for future consultation on the second new community in the summer of 2025 and the effect of this on the submission of a comprehensive draft EDLP for examination and its ultimate adoption.

DRAFT EXETER CITY LOCAL PLAN (REG 19) We made representations on the draft Exeter Plan during formal consultation (which ended on 06 February 2025 and which is running neck and neck with the draft EDLP). These representations asserted that in the context of significant under-delivery against the adopted Local Plan requirement (as noted above, around 2,400 homes), the draft Exeter Plan would not deliver the homes required of it and that it had failed to engage with East Devon District Council (EDDC) under the Duty to Co-operate to explore the ability of unmet need in Exeter to be met in East Devon District. We further asserted that the best place to meet this need would be the West End for the very reasons acknowledged by the draft East Devon LP.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 a further strategic site allocation is needed in the West End to provide the flexibility needed to account for the uncertainties around viability and deliverability of the second new community, the likelihood of having to meet need in the West End arising in Exeter City Council's administrative area that cannot be met there and shortfalls in housing delivery on allocated sites elsewhere in the District.

Our client is promoting land for a sustainable strategic scale mixed-use development to the south of the second new community between the A3052 and the A376, that is unconstrained in land ownership, environmental and infrastructure terms and could come forward quickly.

This site was considered by the Council as part of the site appraisal process for the second new community (GEV-003). The site being promoted by our clients (Option 3) was scored at 37.4. The selected site (Option 1) scored at 38.3 The main difference between the overall scoring (0.9) was because at the time, the Option 3 site was larger

and controlled by multiple landowners, none of whom were contractually bound. The site is now smaller and controlled by three landowners who are contractually bound to promote the development.

The proposals could deliver up to 2,000 new homes, together with a local centre and a range of complementary uses, services and facilities to optimise self-containment, with a focus on active travel connections to employment, leisure and retail destinations. The Vision Statement accompanying these representations provides further detail on the proposals.

Full name: Claire Alers-Hankey

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: This chapter focuses on continued growth in the West End, where support for high growth is given. The West End is a key strategic location for growth in a highly sustainable area that has seen significant development since 2010, with substantial residential growth, employment opportunities, and has strong functional links to Exeter. The West End offers extensive infrastructure, close proximity to urban services, and efficient transport connections, making it a prime location for further strategic development.

Strategic Policy WS01: Development of a second new community east of Exeter

This policy proposed the development of a new community on the western side of East Devon. The new community would be a long-term strategic development scheme, with the expectation that the house and employment development will be delivered by 2042, i.e. within the Plan period.

While the principle of a new settlement is supported, the detail of how the new community can be delivered is very limited within the consultation document. No masterplan for the new community is included within the consultation document. It would appear that the new community concept is being fast-tracked to attempt to progress the Local Plan under the transitional arrangements of the new NPPF. EDDC

should not be criticised for wanting to progress its Local Plan under transitional arrangements given the work that has already been put into preparation of the Local Plan, however, it does appear that the new settlement concept is at a very early stage and therefore, to expect early delivery of housing and employment development is a very unrealistic target.

Accordingly, the employment and housing allocations within the consultation document fail the soundness test on the basis of not being effective, with a significant question over the deliverability over the Plan period.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Less reliance of the new community delivering such high a quantum of development within the Plan period. Inclusion of sites that are deliverable within the Plan period as allocated sites, for example land north of Sowton to be included as an employment allocation.

4. Do you consider that this part of the Development at the West End 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.: To present the case for the inclusion of land north of Sowton as an employment allocation and to scrutinise the deliverability of the new community within Plan period timescales.

Full name: Chris Dadds

Organisation (where relevant): JLL

Other party name (if relevant): Charles Kislingbury on behalf of L Askew

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: To

accommodate significant housing growth, the Local Plan allocates land for a new community at the West End. Our client supports the principle of the proposed new community as identified on the policies map and outlined in draft policy WS01.

Draft policy SW01 states that “the new community will need to accommodate at least 10,000 new homes and associated mixed use development. In the first instance, the land allocated in this plan further to this policy is for the new community to accommodate at least 8,000 new homes, some to be completed before 2042 and some after. The further land to be allocated to accommodate greater housing number and associated mixed use development and infrastructure so the new community can accommodate at least 10,000 new homes will be determined through further work and set out in subsequent development plans.

For the first 8,000 new homes, and supporting facilities and development, land is allocated, as shown on the Policies Plan. This policy sets out requirements to get to this scale of development but all planning and infrastructure capacity and needs work for the new community should take account accommodating greater levels of development, to accommodate at least 10,000 new homes and associated development.” Without the identification of the land required to support the additional 2,000 homes to meet the 10,000-home aspiration, it is not clear how the proposed planning, infrastructure capacity and needs work will be undertaken. The strategy as

proposed is therefore not justified or effective having regards to the soundness tests outlined in the NPPF.

Furthermore, it is understood that a further Regulation 19 consultation on the new community will follow this current Local Plan consultation in May-June 2025. The additional land required to form part of the proposed new community, to deliver at least 10,000 dwellings, should be considered as part of the forthcoming masterplanning process to ensure a comprehensive and coordinated approach to placemaking is undertaken and the full potential of the new settlement realised.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Our client's land is situated to the east of the proposed new community as outlined on the attached site location. The land comprises c.64 hectares which has potential to deliver 1,000-1,500 new homes alongside suitable supporting infrastructure, subject to masterplanning.

The land that is put forward represents a suitable and sustainable location for the expansion of the proposed new settlement in accommodating residential mixed-use development.

The land is not the subject of any national policy or designations that would preclude new development. The land has existing vehicular access points from the B3184. Access to the highway network is therefore readily available from the subject sites. The site lies largely in Flood Zone 1. The land is subject to Flood Zone 2 and 3, where a watercourse associated with the River Clyst crosses the land to the south. The site is not within a National Landscape. The subject site is not situated within a conservation area and there are no listed buildings within the site. The site is not situated within a Locally Listed Park and Garden.

The subject land is suitable, available and achievable as a potential development site and presents a logical extension to the proposed new settlement which is to occupy land to the west.

This land should form part of the proposed new community to realise the 10,000-home aspiration. Draft policy WS01 and the associated policies map should therefore be updated to include the land at Wares Farm as part of the proposed new settlement. Furthermore, the Government's emerging new towns programme has an expectation of proposals reaching a minimum size threshold of 10,000 new homes. Under this programme there would be the potential for substantial support in planning work, financial and other workstreams which it would be desirable for East Devon District Council to take advantage of. This provides a compelling reason as to why it would be advantageous to identify the land required for the delivery of the 10,000 new homes in full.

If the land at Wares Farm is not included in the new community designation, then at the very least, it should be subject to a safeguarding designation to provide certainty around the comprehensive form of development to be delivered. It is important that the land required to meet the full 10,000 quantum should be identified to allow the subject land to be considered as part of ongoing evidence gathering work and future masterplanning activities.

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.: To ensure the Local Plan and policies contained within are found sound having regard to the NPPF.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Church Commissioners

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:

[Representation on behalf of the Church Commissioners who own land at Clyst Honiton] The Commissioners recognise that long-term strategic developments can be crucial to meeting housing requirements in the district, along with providing key infrastructure and facilities for new and existing residents. In this context, The Commissioners endorse Strategic Policy WS01 and the development of a second new town east of Exeter. The Commissioners particularly endorse the Option for allocation brought forward to the Regulation 19 Draft Plan, which benefits from good access via the A30, proximity to Exeter Airport and Exeter Gateway Distribution facility to promote commercial uses, and can be made acceptable in terms of landscape, heritage and ecology via appropriate masterplanning. The site would provide the opportunity to deliver infrastructure to support other development within the local area, particularly complementing the existing Clyst Valley Regional Park and providing opportunity for expansion.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.: ///// PART 2 - CONTINUED FROM PART 1 67fe60e856049900121af0e8 /////

The Strategy and Framework confirms that the Trust is to be responsible for:

maintenance of public open spaces and community facilities;

the maintenance of the SANG land;

sustainable transport initiatives, including bus services and subsidy, e-bikes and car clubs;

costs for the Trust's staff and its ongoing operation; and

placemaking, including community development, activities and events.

A number of potential sources of revenue were identified, including:

an estate charge for each dwelling and commercial unit;

income from community assets, periodic income and charitable grants; and

a scheme of endowment, whereby a number of residential properties were gifted to the charitable trust to be let to private tenants to provide a long term and unrestricted income. Initially, 19 dwellings were endowed to the Trust.

Subject to viability, such an approach to delivering the stewardship of the new community over the longer-term would be supported by the Cherwell Group.

THE COUNCIL'S EMERGING MASTERPLAN

The Cherwell Group note that the Council's more detailed proposals for the new community will be published in the second Regulation 19 consultation later in 2025. They therefore understand that the Council's masterplanners will be continuing to work on the masterplan until that point and that the versions of the masterplan issued by the Council to the landowners in January 2025 is subject to change. However, in order to assist the Council in preparing their final masterplan, the Cherwell Group have the following comments on the most recent version of the masterplan shared in January 2025:

Park and ride – the park and ride is currently proposed to be located to the west of the proposed access from the A3052. It is within land that is not controlled by the Cherwell Group. As shown in the Cherwell Group's masterplan, which is provided in Appendix 2, there is sufficient room within land controlled by the Cherwell Group for the park and ride to be accommodated within their masterplan. To allow for its earlier delivery, the park and ride should be relocated to the east of the proposed access road from the A3052 and within land controlled by the Cherwell Group.

Secondary school – the Cherwell Group note that the only secondary school proposed within the emerging masterplan is located in the north eastern area of the land under their control. However, Policy WS01 of the emerging Local Plan indicates that the preference is for the site to accommodate a “an education campus which will provide primary and secondary school places as well as provision for early years, pupils with special educational needs and Post 16.” There therefore seems to be a disconnect

between the emerging Policy and the Council's proposed masterplan. There is approximately a 2.25ha difference in size between a secondary school and an education campus. Analysis undertaken by the Cherwell Group's masterplanner has indicated that there is not the sufficient quantum of land within the north eastern portion of the Cherwell Group's landholding, of a suitable level, to accommodate an education campus and its ancillary infrastructure, including playing pitches. In order to ensure that the masterplan and therefore Policy WS01 of the emerging Local Plan is effective, there will be a need to relocate the school to an alternative location.

APPLICATION REQUIREMENTS

The emerging Policy requires proposals within the new community to progress in accordance with an agreed allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and a financial appraisal. Additionally, the Policy also confirms that a stewardship strategy is required as part of the site wide masterplan. Unless otherwise agreed with the Local Planning Authority, each planning application should accord with the approved documents.

The Cherwell Group has four principal concerns with these elements of the Policy, as follows:

To ensure that the emerging Policy is clearly written and unambiguous, the Plan should be clear as to what stage of the development management process the allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and the financial appraisal is required to be agreed (i.e. is it prior to the submission of the first application, or as part of it). In that regard we draw attention to the wording of the Cranbrook Expansion Area policies, which state that "the parameter plans shall be agreed in writing by the Local Planning Authority as part of the first approval of any planning application for development..."

Again, to ensure that the emerging Policy is clearly written and unambiguous, there will be a need for the Policy to indicate how the allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and financial appraisal is required to be agreed.

As there is no obvious lead developer (i.e. with an overall controlling portion of the second new community), there will, given the significant implications that the allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and financial appraisal will have on the deliverability of all development proposals within the new community, be a need for these elements of work to be undertaken with meaningful engagement with all landowners. Agreement should be reached with all members of the consortium before the work is approved by the Local Planning Authority. To ensure that Policy WS01 is effective, this should be specified in the wording of the Policy.

The Policy states that whilst the emerging Local Plan only allocates land to accommodate 8,000 new homes and supporting facilities and infrastructure, infrastructure capacity should take account of the ambition to grow the community by a further 2,000 homes, to 10,000 in the longer term. Whilst for some elements of infrastructure this could be a possibility, without any surety over where the additional development will be located, it may be difficult for others. For instance, what assumptions will or can be made about trip assignment in relation to junctions onto the existing public highway and the location of education provision, when the location of the additional 2,000 homes is unknown?

OTHER CONSIDERATIONS

LAND USE BUDGET

No land use budget has been provided with the current Local Plan consultation that can be used to demonstrate that the development proposed in the area of land allocated at Policy WS01 is deliverable and therefore effective. The Cherwell Group reserves the right to provide further comment on this matter in future iterations of the Plan.

VIABILITY

Financial viability was a key consideration for the Cranbrook new community and it is likely to be for the second new community, particularly given the likely requirements for significant levels of infrastructure that will be necessary to support such a

development. At Cranbrook, a detailed Infrastructure Delivery Plan was prepared to support the Cranbrook Plan. The Cherwell Group notes that the Local Planning Authority intends to publish an Infrastructure Delivery Plan for the second new community alongside the second Regulation 19 version of the Local Plan. The necessary infrastructure listed in that document and total costs for delivering the infrastructure will be key to understanding whether or not the new community is financially viable and therefore deliverable and in turn effective. The Cherwell Group therefore reserves the right to comment on the infrastructure delivery plan and the scheme's financial viability in their representations to future iterations of the Plan.

In addition, whilst the Community Infrastructure Levy is operational in parts of East Devon, the Local Planning Authority made Cranbrook exempt during the plan-making process. Instead, infrastructure has been secured through the conventional Section 106 process. The approach to funding and delivering infrastructure at the second new town needs early consideration and confirmation.

CONFORMITY WITH PARAGRAPH 74 OF THE NPPF

Para. 74 of the 2023 version of the NPPF confirms that the supply of new homes can often best be achieved through planning for larger scale development, such as new communities, provided they are:

well located;

well designed; and

are supported by necessary infrastructure and facilities.

Moreover, working with communities and other stakeholders, local planning authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

ensure that the size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development, or in larger towns to which there is good access;

set clear expectations for the quality of the places to be created and how this will be maintained;

ensure appropriate tools, such as masterplans and design codes are used to secure a variety of well-designed homes to meet the needs of different groups of the community;

make a realistic assessment of likely rates of delivery; and

consider whether it is appropriate to establish a Green Belt around or adjoining new developments of a significant size.

An assessment of how the new community proposed at Policy WS01 of the emerging Plan accords with each of these tests is set out below in turn.

WELL LOCATED

As has been demonstrated in Section 5 above, the new community provides a strong fit with the Plan's spatial strategy, which was assessed through the Sustainability Appraisal and was found to be the preferred option. It mirrors the strategy employed in the Adopted Local Plan.

Moreover, three options for the location of the new community have been assessed within the evidence base supporting the Local Plan, including the Sustainability Appraisal. The location of the new community was again found to be the most appropriate when considering reasonable alternatives.

WELL DESIGNED

The Local Planning Authority's own assessment work underpinning the emerging Local Plan, the design work required by Policy WS01 of the emerging Local Plan, together with other more generic design related policy, including Policy DS01 and DS02, will ensure that the new community is well designed. SUPPORTED BY NECESSARY INFRASTRUCTURE AND FACILITIES

We understand that the Infrastructure Delivery Plan for the second new community, which will be published later in 2025, will establish the necessary infrastructure and facilities that will need to support the new community. This will ensure that the services and facilities required on a daily basis by the future residents of the new community will be available and can be accessed via active and sustainable modes of travel. It will also ensure that the impact of the development is mitigated.

EXISTING OR PLANNED INVESTMENT IN INFRASTRUCTURE

The location of the new community ensures that it is in close proximity to the strategically important Clyst Valley Regional Park, which aims to, amongst other things, connect communities with nature, by traffic free trails. The active travel strategy prepared by AWP ensures that the new community will provide active travel connections between the development and the Clyst Valley Regional Park, including via green connections, which will also provide a functional connection for the benefit of biodiversity interest.

The new community is also located in close proximity to an energy from waste facility. There are proposals for the facility to provide residual heat to the Cranbrook New Community and we understand that it could also supply heat for all or some of the second new community. Whilst, as discussed in Section 8 below, there are potentially other alternatives, it does, in the context of para. 73(a) of the 2023 version of the NPPF, constitute an opportunity presented by infrastructure.

ECONOMIC POTENTIAL

The employment land proposed within the new community will complement the existing and planned strategically important employment provision located within the western area of East Devon and on the eastern edge of Exeter.

NET GAINS TO BIODIVERSITY

An appropriate net gain to biodiversity can be achieved from the new community. Functional green connections are also proposed to the Clyst Valley Regional Park.

SERVICES, FACILITIES AND EMPLOYMENT OPPORTUNITIES WITHIN THE NEW COMMUNITY AND IN THE WIDER ENVIRONS

As set out in Policy WS01 of the emerging Local Plan, the new community will house a full range of social, community and education facilities, a town centre, a number of smaller neighbourhood centres and employment land. The new community will also be located in close proximity to the services, facilities and employment opportunities located within the West End, on the eastern edge of Exeter and within Exeter city centre.

EXPECTATIONS ABOUT THE QUALITY OF PLACE

The combination of the vision for the new community and the detailed policy framework provided by Policy WS01 of the emerging Local Plan, and more generic development management policies, ensure that there are clear expectations regarding the quality of the place.

MASTERPLAN AND DESIGN CODES

Policy WS01 and DS02 of the emerging Local Plan will require the submission of an allocation wide masterplan and a design code or codes.

REALISTIC ASSESSMENT OF RATES OF DELIVERY

The Cherwell Group provided an assessment of the anticipated rates of delivery in Section 6 above. They consider that whilst the rates of delivery for the new community are ambitious, they are aspirational, but deliverable.

GREEN BELT

The Cherwell Group do not consider it necessary for a Green Belt to be provided to the east of Exeter. The proposed new community benefits from strong defensible boundaries to the west, south and north, including the Clyst Valley Regional Park, the M5, the A3052 and the A30.

No such designation has been required for the Cranbrook New Community and it is considered that, if necessary, other development management policies would suffice. The Cherwell Group are aware that, for instance, Green Wedge designations have successfully been used at Cranbrook. Moreover, such a designation may impact on the ability for the Local Planning Authority to allocate land for the additional 2,000 homes that is to be made in a subsequent development plan document. Consequently, it is not considered that the tests of para. 144 of the NPPF have been met in this instance.

SUMMARY

It can be seen that the proposed new community strongly accords with para. 74 of the NPPF. It is therefore, in these terms, consistent with national planning policy.

SYNTHESIS

The Cherwell Group considers that, fundamentally, the second new town is a sound proposition. They consider that it is founded on robust evidence and provides a strong fit with national planning policy.

They have suggested a number of minor amendments to the proposed wording of Policy WS01. These suggested alterations are proposed to ensure that the allocation is both justified and effective.

THE EVIDENCE BASE

As has been demonstrated in the previous sections of this representation, the Cherwell Group are generally supportive of the emerging Local Plan, including the proposed second new community. However, they do have a number of concerns relating to the evidence base underpinning the Plan. Their main concerns primarily relate to the 'East Devon – Options Appraisal for a potential New Settlement' Report. However, they also have more minor concerns in relation to the Housing and Economic Land Availability Assessment (HELAA). These concerns are outlined in turn below.

EAST DEVON - OPTIONS APPRAISAL FOR A POTENTIAL NEW SETTLEMENT REPORT

The 'East Devon – Options Appraisal for a potential New Settlement' Report rightfully concludes that of the options assessed, Option 1 (land to the north of the A3052 and to the south of the A30) is the preferred option. However, the Cherwell Group consider that for the reasons set out below, the assessment work underscores Option 1 and overscores Option 3 (land to the south of the A3052). The revised assessment work undertaken on behalf of the Cherwell Group therefore indicates that Option 1 outperforms Option 3 by a more significant margin.

The Cherwell Group's revised assessment work is set out below and follows the assessment categories set out in the original Report. It only re-assesses Options 1 and 3, as Option 2 was discounted in the evidence work.

LANDSCAPE SENSITIVITY

Work undertaken on behalf of the Cherwell Group to evaluate landscape capacity broadly corroborates the findings of the ‘Landscape Sensitivity Assessment for New Community East of Exeter’ Report, prepared by Fiona Fyfe Associates Ltd. The assessment work concludes that land to the centre west of the study area is the least sensitive in landscape terms.

However, work undertaken on behalf of the Cherwell Group concludes that land to the immediate south of the A30 (northern part of LLU A) should be considered of medium sensitivity due to its proximity to the A30, and Exeter Airport, and the influence that these elements exert over the landscape. Moreover, development visible on higher land is not untypical of the wider landscape, and that with sensitive design and structural planting this could be accommodated. The way in which LLU boundaries have been determined does not however allow for this finer grain of assessment. Consequently, it was considered that LLU A should in fact be divided into two separate areas and assessed independently in a similar fashion to LLU G and LLU I.

The Cherwell Group’s work also concluded that a broader proportion of LLU G to the south should be considered of High – Medium sensitivity due to the availability of distant views, its openness, its proximity to Clyst St George and its rural character.

On balance, the Cherwell Group are of the opinion that Option 1 and 3 should score equally.

ECOLOGICAL IMPACT / BIODIVERSITY

In the absence of any detailed ecological assessment work for large parts of Option 1 and for Option 3, no amendments are proposed to the original assessment’s scoring for both Options in respect of ecological impact/biodiversity.

Notwithstanding the above, we note the conclusions of the Sustainability Appraisal [Page 268] in respect of Option 3, which afforded Option 3 a major negative score “given its proximity to the Exe Estuary and greater overall risk to the ecological network.”

FLOOD RISK

The original Assessment work, for flood risk, concludes for both Options 1 and 3 that they would result in a “low to medium flood risk that can be reduced by well designed and implemented drainage and water mitigation strategies.” Both Options were therefore scored 4.

Work by Calibro has suggested that the access from the A3052 required to deliver Option 3 would need to traverse a large area of floodplain (in excess of 150m). They conclude that delivering this access could require significant engineering works. It is likely that the Environment Agency will seek for minimum works to be included within the floodplain, so a wide clear-span bridge with intermediate supporting piers may be required for some of its length. Openings would need to be at least 0.3m but could be up to 0.6m above the flood level. Road construction is likely to be a further metre but could be higher to allow for buried services.

Whilst watercourse crossings will be required to deliver Option 1, the watercourses flow through much narrower well-defined valleys, so the crossing would be much shorter.

On the basis of the above, Calibro conclude that Option 3 is more constrained by flood risk than the original Assessment work suggests and should be downgraded to a 3, rather than a 4. The mitigation works required for its access could also have implications for other assessment categories, including landscape sensitivity and ecological impact.

MINERALS

An assessment of the impact that Options 1 and 3 would have on mineral resources was provided in Section 6 of the original Report. Option 1 was afforded a score of 3, whilst Option 3 scored 5.

As set out in Table 6.5 of the Assessment, Option 1’s reduced score reflects the Mineral’s Safeguarding Zone within Hill Barton Business Park (Policy M2 of the Devon Minerals Plan) and the established strategic waste facility within the same Business Park (Policy W10 of the Devon Waste Plan).

In both instances the designations and their uses are geographically limited to the Hill Barton Business Park. As set out in para. 3.14 of the Report, the Hill Barton Business Park was excluded from the land take required to deliver the new community. Whilst this is not entirely reflected in Figure 3.3 of the Assessment, it clearly should have been.

Consequently, the score for Option 1 should be improved by a further 2 points.

HISTORIC ENVIRONMENT

At the present time, the Cherwell Group do not provide any comment relating to the impact that either Option could have on designated heritage assets. They note that the conclusions presented in the Options Assessment mirrors the conclusions with the Sustainability Appraisal, which itself concludes that:

“...all Options are likely to have minor negative effect due to potential impact upon the setting of designated heritage assets [Page 270].”

We also note that there is only one Grade II Listed Building within Option 1 and three Grade II Listed Buildings within Option 3. As there are three times the number of designated heritage assets in Option 3, it follows that there is a greater chance of harming the significance of designated assets in Option 3, than Option 1. Therefore, whilst the scoring of both Options within this Representation mirrors the Options assessment, it could be argued that Option 3 should score lower than Option 1.

Given the above, the historic environment scoring from the original assessment work has been used within the revised assessment.

SUSTAINABLE ACCESSIBILITY

Section 7 of the CBRE report provides scores for the four assessment categories namely: walking, cycling, public transport and proximity to employment.

WALKING

The report acknowledges that pedestrian infrastructure is presently limited as all three options are in a predominantly rural area. However, there are footways along the A3052 to the west of the Cat and Fiddle, which the report states are in the “immediate vicinity of all three options”. Whilst it is true that these footways are within close proximity to Option 1 and the western part of Option 2, they are not close to the bulk of Option 3 with only the extreme northern part of this Option located within walking distance. The A376 and B3179 (Woodbury Road) relate better to the bulk of Option 3 and do not have footways.

The Report also states that the proposed Clyst Valley Trail (CVT) is within the vicinity of Options 1 and 3. However, it is considered that Option 1 is better located for pedestrian access to the CVT in terms of distance and the ability to use existing routes such as Bishops Court Road. Option 3 is located further from the CVT and is separated by the A376, which would need to be safely crossed to access this route.

Therefore, it is hard to fathom how Option 3 scores higher than Option 1 for walking (by 4 to 3). It is suggested that Option 1 should score higher than Option 3.

CYCLING

Again, the report acknowledges that cycling infrastructure is presently limited in the area, but states that Option 3 is close (within 1.5km) of National Cycle Route 2 (NCN2). This may be correct but it fails to mention that cyclists will have to cross the A376 and travel along Topsham Road to access this route. NCN2 is not immediately adjacent to Option 3 and so is not as convenient as the cycling score (4) suggests.

As already noted, it is our view that Option 1 is better located for the CVT, which will provide a direct, safe, green route to employment centres at the Science Park, Sky Park, and close access to Exeter Business Park and Sowton Industrial Estate. In addition, there is a traffic-free/advisory cycle route to the north of the A3052 from Westpoint that provides a route to Digby and Sowton train station and connects with other routes leading into Exeter city centre.

Therefore, it is difficult to comprehend why Option 3 scores higher than Option 1 for cycling (by 4 to 3). It is suggested that Option 1 and Option 3 should have similar scores for cycling (4 each).

PUBLIC TRANSPORT

The Report states that whilst “all three options have a good level of existing connectivity by bus,” high-quality public transport provision will be needed for all options.

The Report identifies that there are already bus services along the A3052. It is worth noting that these stops are located within 500m of the centre of land at Axehayes Farm, and that two Planning Inspectors have found the location to be “well related in sustainability terms” in recent Appeal decisions.

The Report states that Options 1 and 3 are well related to train stations located on the Avocet railway line and in Exeter itself.

Therefore, again it is difficult to see why Option 3 scores higher than Option 1 for public transport (by 5 to 4). Given it is acknowledged that services will need to be improved for all options, it is suggested that Option 1 and Option 3 should both score 4 for public transport.

REVISED SCORING

Given the above, it is suggested that the sustainable accessible assessment category scores should be adjusted as shown in Table 2 on page 55 of the attached document for the three categories (walking, cycling and public transport).

The above scoring would provide a better fit with the conclusions of the Sustainability Appraisal [Page 277], which concludes that Option 1 as having a major positive effect for connectivity and transport, with Option 3 only having a minor positive effect.

HIGHWAYS

The modelling undertaken by WSP, which was approved by Devon County Council, identifies that Option 1 has a lesser adverse effect upon the surrounding highway network than Option 3. This is mainly due to the significant traffic impact that Option 3 has at the Clyst St Mary roundabout, and also at Junction 30 of the M5 motorway.

Various improvement options are identified in the report for the Clyst St Mary roundabout. Only two of these are deemed to be easily deliverable; namely the signalisation of the roundabout and the provision of a Park and Ride facility at Westpoint to reduce traffic flows through this junction. The latter could be provided on the Axehayes site as shown within the Vision Document appended to these representations. Given this, the score for the impact of Option 1 at the Clyst St Mary roundabout should be increased to 4 (from 3) and the deliverability score similarly increased to 5 (from 4). Indeed, it is odd how Option 2 and 3 have been awarded the same scores for the Clyst St Mary roundabout even though Table 7 in the WSP Technical Note clearly states that Option 3 has the “highest impact of the scenarios”.

The Report states that the East of Exeter Network will only be affected by Option 2. However, this seems hard to believe given that Option 3 will be accessed from the A376 according to the WSP Technical Note (along with an access onto the A3052 and B3179) and so some of this traffic will undoubtedly route onto the road network to the east and south of Clyst St Mary (as defined in Section 8.40 of the CBRE Report). Given this, the score for both the impact and deliverability of Option 3 on the East of Exeter Network should be decreased to 4 (from 5).

REVISED SCORING

The existing and revised scores for the highways assessment category are shown in Table 3 on page 56 of the attached document for the two categories identified above to reflect the findings of the Hydrock/WSP technical work more accurately.

UTILITIES

The Cherwell Group do not demure from the conclusions presented within Section 9 of the Assessment in relation to utilities.

NET ZERO CARBON ASSESSMENT

At this stage, the Cherwell Group consider that the scoring for net zero carbon is appropriate. That said, they question why para. 9.131 raises concerns about the proximity of Exeter Airport being a potential constraint for solar energy in Option 1. At Cranbrook, which is located adjacent to the Airport, solar photovoltaic solutions are actively promoted within the Development Plan.

The Cherwell Group also note that Option 1 performed better than Option 3 in the Sustainability Assessment on minimising carbon emissions [Page 270].

CLIMATE RESILIENCE

Appendix F of the Options Appraisal includes an assessment of each Option's resilience to climate change. Figures are provided within the assessment work. However, for each element of work the three options appear to be located to the north of the A3052 and to the south of the A30 (i.e. within Options 1 and 2). Consequently, the Cherwell Group are unsure as to whether the climate resilience work has assessed only sub-areas within Options 1 and 2 and not Option 3, or whether the figures presented within the work are inaccurate.

Given the above, the Cherwell Group reserved the right to comment on this work at subsequent stages of the plan-making process and have excluded climate resilience from their revised assessment work.

They do however note that the Sustainability Appraisal concluded that "Options 1 and 3 have similar overall climate resilience [Page 272]."

DELIVERABILITY

The Cherwell Group agree with the assessment work in relation to deliverability. They also agree that land assembly concerns reflect valuable lessons learnt at Cranbrook. We are also aware that the promoters of Option 1 have a proven record of delivering complex sites. The Cherwell Group are willing to work with other developers with land within Option 1 to bring forward a comprehensive development.

OVERALL SCORE

The revised assessment work presented above would result in the overall scores in Table 4 on page 57 of the attached document.

HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT

Land at Axehayes Farm was assessed in the HELAA as site GH/ED/52. The assessment work rightfully concludes that the site is suitable, available and achievable. The Cherwell Group agree with this conclusion. The work provided in the accompanying Vision Document also demonstrates that this conclusion is appropriate.

Notwithstanding the above, the technical work undertaken by the Cherwell Group indicates that some of the site's suitability assessment work in the HELAA is overly cautious. These matters are set out below:

Heritage - the HELAA assessment work concluded that the heritage sensitivity of the site is medium, as there is the potential for development to impact on Higher Holbrook Farm, which is a designated heritage asset. However, technical work prepared on behalf of the Cherwell Group by Orion Heritage concludes that "there was no direct intervisibility between the built heritage assets within the 1km study area and the study site due to distance, vegetation and topography." Consequently, the development of Axehayes Farm would not impact on the significance of any designated asset, including Higher Holbrook Farm.

Highways - The HELAA Panel concluded that there was a need for significant preparatory strategic highways improvements to allow for the site to be developed. This

included delivering infrastructure to minimise impacts on Junctions 29 and 30 of the M5 Motorway. However, this conflicts with more recent evidence prepared on behalf of the Council which concludes that “development of 2,500 new homes up to the end of the Plan period could be accommodated without significant highways interventions [Executive Summary, Options Appraisal Technical Assessment – Summary, ‘East Devon – Options Appraisal for a Potential New Settlement,’ 2022].”

These revised conclusions should be reflected in an updated HELAA assessment for the subject site and the other evidence base documents that the HELAA has influenced.

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: ///// PART 2 - CONTINUED FROM PART 1 67fe60e856049900121af0e8 /////

The Strategy and Framework confirms that the Trust is to be responsible for:

maintenance of public open spaces and community facilities;

the maintenance of the SANG land;

sustainable transport initiatives, including bus services and subsidy, e-bikes and car clubs;

costs for the Trust’s staff and its ongoing operation; and

placemaking, including community development, activities and events.

A number of potential sources of revenue were identified, including:

an estate charge for each dwelling and commercial unit;

income from community assets, periodic income and charitable grants; and

a scheme of endowment, whereby a number of residential properties were gifted to the charitable trust to be let to private tenants to provide a long term and unrestricted income. Initially, 19 dwellings were endowed to the Trust.

Subject to viability, such an approach to delivering the stewardship of the new community over the longer-term would be supported by the Cherwell Group.

THE COUNCIL'S EMERGING MASTERPLAN

The Cherwell Group note that the Council's more detailed proposals for the new community will be published in the second Regulation 19 consultation later in 2025. They therefore understand that the Council's masterplanners will be continuing to work on the masterplan until that point and that the versions of the masterplan issued by the Council to the landowners in January 2025 is subject to change. However, in order to assist the Council in preparing their final masterplan, the Cherwell Group have the following comments on the most recent version of the masterplan shared in January 2025:

Park and ride – the park and ride is currently proposed to be located to the west of the proposed access from the A3052. It is within land that is not controlled by the Cherwell Group. As shown in the Cherwell Group's masterplan, which is provided in Appendix 2, there is sufficient room within land controlled by the Cherwell Group for the park and ride to be accommodated within their masterplan. To allow for its earlier delivery, the park and ride should be relocated to the east of the proposed access road from the A3052 and within land controlled by the Cherwell Group.

Secondary school – the Cherwell Group note that the only secondary school proposed within the emerging masterplan is located in the north eastern area of the land under their control. However, Policy WS01 of the emerging Local Plan indicates that the preference is for the site to accommodate a “an education campus which will provide primary and secondary school places as well as provision for early years, pupils with special educational needs and Post 16.” There therefore seems to be a disconnect between the emerging Policy and the Council's proposed masterplan. There is

approximately a 2.25ha difference in size between a secondary school and an education campus. Analysis undertaken by the Cherwell Group’s masterplanner has indicated that there is not the sufficient quantum of land within the north eastern portion of the Cherwell Group’s landholding, of a suitable level, to accommodate an education campus and its ancillary infrastructure, including playing pitches. In order to ensure that the masterplan and therefore Policy WS01 of the emerging Local Plan is effective, there will be a need to relocate the school to an alternative location.

APPLICATION REQUIREMENTS

The emerging Policy requires proposals within the new community to progress in accordance with an agreed allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and a financial appraisal. Additionally, the Policy also confirms that a stewardship strategy is required as part of the site wide masterplan. Unless otherwise agreed with the Local Planning Authority, each planning application should accord with the approved documents.

The Cherwell Group has four principal concerns with these elements of the Policy, as follows:

To ensure that the emerging Policy is clearly written and unambiguous, the Plan should be clear as to what stage of the development management process the allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and the financial appraisal is required to be agreed (i.e. is it prior to the submission of the first application, or as part of it). In that regard we draw attention to the wording of the Cranbrook Expansion Area policies, which state that “the parameter plans shall be agreed in writing by the Local Planning Authority as part of the first approval of any planning application for development...”

Again, to ensure that the emerging Policy is clearly written and unambiguous, there will be a need for the Policy to indicate how the allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and financial appraisal is required to be agreed.

As there is no obvious lead developer (i.e. with an overall controlling portion of the second new community), there will, given the significant implications that the

allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and financial appraisal will have on the deliverability of all development proposals within the new community, be a need for these elements of work to be undertaken with meaningful engagement with all landowners. Agreement should be reached with all members of the consortium before the work is approved by the Local Planning Authority. To ensure that Policy WS01 is effective, this should be specified in the wording of the Policy.

The Policy states that whilst the emerging Local Plan only allocates land to accommodate 8,000 new homes and supporting facilities and infrastructure, infrastructure capacity should take account of the ambition to grow the community by a further 2,000 homes, to 10,000 in the longer term. Whilst for some elements of infrastructure this could be a possibility, without any surety over where the additional development will be located, it may be difficult for others. For instance, what assumptions will or can be made about trip assignment in relation to junctions onto the existing public highway and the location of education provision, when the location of the additional 2,000 homes is unknown?

OTHER CONSIDERATIONS

LAND USE BUDGET

No land use budget has been provided with the current Local Plan consultation that can be used to demonstrate that the development proposed in the area of land allocated at Policy WS01 is deliverable and therefore effective. The Cherwell Group reserves the right to provide further comment on this matter in future iterations of the Plan.

VIABILITY

Financial viability was a key consideration for the Cranbrook new community and it is likely to be for the second new community, particularly given the likely requirements for significant levels of infrastructure that will be necessary to support such a development. At Cranbrook, a detailed Infrastructure Delivery Plan was prepared to support the Cranbrook Plan. The Cherwell Group notes that the Local Planning

Authority intends to publish an Infrastructure Delivery Plan for the second new community alongside the second Regulation 19 version of the Local Plan. The necessary infrastructure listed in that document and total costs for delivering the infrastructure will be key to understanding whether or not the new community is financially viable and therefore deliverable and in turn effective. The Cherwell Group therefore reserves the right to comment on the infrastructure delivery plan and the scheme's financial viability in their representations to future iterations of the Plan.

In addition, whilst the Community Infrastructure Levy is operational in parts of East Devon, the Local Planning Authority made Cranbrook exempt during the plan-making process. Instead, infrastructure has been secured through the conventional Section 106 process. The approach to funding and delivering infrastructure at the second new town needs early consideration and confirmation.

CONFORMITY WITH PARAGRAPH 74 OF THE NPPF

Para. 74 of the 2023 version of the NPPF confirms that the supply of new homes can often best be achieved through planning for larger scale development, such as new communities, provided they are:

well located;

well designed; and

are supported by necessary infrastructure and facilities.

Moreover, working with communities and other stakeholders, local planning authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

ensure that the size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development, or in larger towns to which there is good access;

set clear expectations for the quality of the places to be created and how this will be maintained;

ensure appropriate tools, such as masterplans and design codes are used to secure a variety of well-designed homes to meet the needs of different groups of the community;

make a realistic assessment of likely rates of delivery; and

consider whether it is appropriate to establish a Green Belt around or adjoining new developments of a significant size.

An assessment of how the new community proposed at Policy WS01 of the emerging Plan accords with each of these tests is set out below in turn.

WELL LOCATED

As has been demonstrated in Section 5 above, the new community provides a strong fit with the Plan's spatial strategy, which was assessed through the Sustainability Appraisal and was found to be the preferred option. It mirrors the strategy employed in the Adopted Local Plan.

Moreover, three options for the location of the new community have been assessed within the evidence base supporting the Local Plan, including the Sustainability Appraisal. The location of the new community was again found to be the most appropriate when considering reasonable alternatives.

WELL DESIGNED

The Local Planning Authority's own assessment work underpinning the emerging Local Plan, the design work required by Policy WS01 of the emerging Local Plan, together with other more generic design related policy, including Policy DS01 and DS02, will ensure that the new community is well designed. SUPPORTED BY NECESSARY INFRASTRUCTURE AND FACILITIES

We understand that the Infrastructure Delivery Plan for the second new community, which will be published later in 2025, will establish the necessary infrastructure and facilities that will need to support the new community. This will ensure that the services and facilities required on a daily basis by the future residents of the new community will be available and can be accessed via active and sustainable modes of travel. It will also ensure that the impact of the development is mitigated.

EXISTING OR PLANNED INVESTMENT IN INFRASTRUCTURE

The location of the new community ensures that it is in close proximity to the strategically important Clyst Valley Regional Park, which aims to, amongst other things, connect communities with nature, by traffic free trails. The active travel strategy prepared by AWP ensures that the new community will provide active travel connections between the development and the Clyst Valley Regional Park, including via green connections, which will also provide a functional connection for the benefit of biodiversity interest.

The new community is also located in close proximity to an energy from waste facility. There are proposals for the facility to provide residual heat to the Cranbrook New Community and we understand that it could also supply heat for all or some of the second new community. Whilst, as discussed in Section 8 below, there are potentially other alternatives, it does, in the context of para. 73(a) of the 2023 version of the NPPF, constitute an opportunity presented by infrastructure.

ECONOMIC POTENTIAL

The employment land proposed within the new community will complement the existing and planned strategically important employment provision located within the western area of East Devon and on the eastern edge of Exeter.

NET GAINS TO BIODIVERSITY

An appropriate net gain to biodiversity can be achieved from the new community. Functional green connections are also proposed to the Clyst Valley Regional Park.

SERVICES, FACILITIES AND EMPLOYMENT OPPORTUNITIES WITHIN THE NEW COMMUNITY AND IN THE WIDER ENVIRONS

As set out in Policy WS01 of the emerging Local Plan, the new community will house a full range of social, community and education facilities, a town centre, a number of smaller neighbourhood centres and employment land. The new community will also be located in close proximity to the services, facilities and employment opportunities located within the West End, on the eastern edge of Exeter and within Exeter city centre.

EXPECTATIONS ABOUT THE QUALITY OF PLACE

The combination of the vision for the new community and the detailed policy framework provided by Policy WS01 of the emerging Local Plan, and more generic development management policies, ensure that there are clear expectations regarding the quality of the place.

MASTERPLAN AND DESIGN CODES

Policy WS01 and DS02 of the emerging Local Plan will require the submission of an allocation wide masterplan and a design code or codes.

REALISTIC ASSESSMENT OF RATES OF DELIVERY

The Cherwell Group provided an assessment of the anticipated rates of delivery in Section 6 above. They consider that whilst the rates of delivery for the new community are ambitious, they are aspirational, but deliverable.

GREEN BELT

The Cherwell Group do not consider it necessary for a Green Belt to be provided to the east of Exeter. The proposed new community benefits from strong defensible boundaries to the west, south and north, including the Clyst Valley Regional Park, the M5, the A3052 and the A30.

No such designation has been required for the Cranbrook New Community and it is considered that, if necessary, other development management policies would suffice. The Cherwell Group are aware that, for instance, Green Wedge designations have successfully been used at Cranbrook. Moreover, such a designation may impact on the ability for the Local Planning Authority to allocate land for the additional 2,000 homes that is to be made in a subsequent development plan document. Consequently, it is not considered that the tests of para. 144 of the NPPF have been met in this instance.

SUMMARY

It can be seen that the proposed new community strongly accords with para. 74 of the NPPF. It is therefore, in these terms, consistent with national planning policy.

SYNTHESIS

The Cherwell Group considers that, fundamentally, the second new town is a sound proposition. They consider that it is founded on robust evidence and provides a strong fit with national planning policy.

They have suggested a number of minor amendments to the proposed wording of Policy WS01. These suggested alterations are proposed to ensure that the allocation is both justified and effective.

THE EVIDENCE BASE

As has been demonstrated in the previous sections of this representation, the Cherwell Group are generally supportive of the emerging Local Plan, including the proposed second new community. However, they do have a number of concerns relating to the evidence base underpinning the Plan. Their main concerns primarily relate to the ‘East Devon – Options Appraisal for a potential New Settlement’ Report. However, they also have more minor concerns in relation to the Housing and Economic Land Availability Assessment (HELAA). These concerns are outlined in turn below.

EAST DEVON - OPTIONS APPRAISAL FOR A POTENTIAL NEW SETTLEMENT REPORT

The ‘East Devon – Options Appraisal for a potential New Settlement’ Report rightfully concludes that of the options assessed, Option 1 (land to the north of the A3052 and to the south of the A30) is the preferred option. However, the Cherwell Group consider that for the reasons set out below, the assessment work underscores Option 1 and overscores Option 3 (land to the south of the A3052). The revised assessment work undertaken on behalf of the Cherwell Group therefore indicates that Option 1 outperforms Option 3 by a more significant margin.

The Cherwell Group’s revised assessment work is set out below and follows the assessment categories set out in the original Report. It only re-assesses Options 1 and 3, as Option 2 was discounted in the evidence work.

LANDSCAPE SENSITIVITY

Work undertaken on behalf of the Cherwell Group to evaluate landscape capacity broadly corroborates the findings of the ‘Landscape Sensitivity Assessment for New Community East of Exeter’ Report, prepared by Fiona Fyfe Associates Ltd. The assessment work concludes that land to the centre west of the study area is the least sensitive in landscape terms.

However, work undertaken on behalf of the Cherwell Group concludes that land to the immediate south of the A30 (northern part of LLU A) should be considered of medium sensitivity due to its proximity to the A30, and Exeter Airport, and the influence that these elements exert over the landscape. Moreover, development visible on higher land is not untypical of the wider landscape, and that with sensitive design and structural planting this could be accommodated. The way in which LLU boundaries have been determined does not however allow for this finer grain of assessment. Consequently, it was considered that LLU A should in fact be divided into two separate areas and assessed independently in a similar fashion to LLU G and LLU I.

The Cherwell Group's work also concluded that a broader proportion of LLU G to the south should be considered of High – Medium sensitivity due to the availability of distant views, its openness, its proximity to Clyst St George and its rural character.

On balance, the Cherwell Group are of the opinion that Option 1 and 3 should score equally.

ECOLOGICAL IMPACT / BIODIVERSITY

In the absence of any detailed ecological assessment work for large parts of Option 1 and for Option 3, no amendments are proposed to the original assessment's scoring for both Options in respect of ecological impact/biodiversity.

Notwithstanding the above, we note the conclusions of the Sustainability Appraisal [Page 268] in respect of Option 3, which afforded Option 3 a major negative score "given its proximity to the Exe Estuary and greater overall risk to the ecological network."

FLOOD RISK

The original Assessment work, for flood risk, concludes for both Options 1 and 3 that they would result in a "low to medium flood risk that can be reduced by well designed and implemented drainage and water mitigation strategies." Both Options were therefore scored 4.

Work by Calibro has suggested that the access from the A3052 required to deliver Option 3 would need to traverse a large area of floodplain (in excess of 150m). They conclude that delivering this access could require significant engineering works. It is likely that the Environment Agency will seek for minimum works to be included within the floodplain, so a wide clear-span bridge with intermediate supporting piers may be required for some of its length. Openings would need to be at least 0.3m but could be up to 0.6m above the flood level. Road construction is likely to be a further metre but could be higher to allow for buried services.

Whilst watercourse crossings will be required to deliver Option 1, the watercourses flow through much narrower well-defined valleys, so the crossing would be much shorter.

On the basis of the above, Calibro conclude that Option 3 is more constrained by flood risk than the original Assessment work suggests and should be downgraded to a 3, rather than a 4. The mitigation works required for its access could also have implications for other assessment categories, including landscape sensitivity and ecological impact.

MINERALS

An assessment of the impact that Options 1 and 3 would have on mineral resources was provided in Section 6 of the original Report. Option 1 was afforded a score of 3, whilst Option 3 scored 5.

As set out in Table 6.5 of the Assessment, Option 1's reduced score reflects the Mineral's Safeguarding Zone within Hill Barton Business Park (Policy M2 of the Devon Minerals Plan) and the established strategic waste facility within the same Business Park (Policy W10 of the Devon Waste Plan).

In both instances the designations and their uses are geographically limited to the Hill Barton Business Park. As set out in para. 3.14 of the Report, the Hill Barton Business Park was excluded from the land take required to deliver the new community. Whilst this is not entirely reflected in Figure 3.3 of the Assessment, it clearly should have been.

Consequently, the score for Option 1 should be improved by a further 2 points.

HISTORIC ENVIRONMENT

At the present time, the Cherwell Group do not provide any comment relating to the impact that either Option could have on designated heritage assets. They note that the conclusions presented in the Options Assessment mirrors the conclusions with the Sustainability Appraisal, which itself concludes that:

“...all Options are likely to have minor negative effect due to potential impact upon the setting of designated heritage assets [Page 270].”

We also note that there is only one Grade II Listed Building within Option 1 and three Grade II Listed Buildings within Option 3. As there are three times the number of designated heritage assets in Option 3, it follows that there is a greater chance of harming the significance of designated assets in Option 3, than Option 1. Therefore, whilst the scoring of both Options within this Representation mirrors the Options assessment, it could be argued that Option 3 should score lower than Option 1.

Given the above, the historic environment scoring from the original assessment work has been used within the revised assessment.

SUSTAINABLE ACCESSIBILITY

Section 7 of the CBRE report provides scores for the four assessment categories namely: walking, cycling, public transport and proximity to employment.

WALKING

The report acknowledges that pedestrian infrastructure is presently limited as all three options are in a predominantly rural area. However, there are footways along the A3052 to the west of the Cat and Fiddle, which the report states are in the “immediate vicinity

of all three options”. Whilst It is true that these footways are within close proximity to Option 1 and the western part of Option 2, they are not close to the bulk of Option 3 with only the extreme northern part of this Option located within walking distance. The A376 and B3179 (Woodbury Road) relate better to the bulk of Option 3 and do not have footways.

The Report also states that the proposed Clyst Valley Trail (CVT) is within the vicinity of Options 1 and 3. However, it is considered that Option 1 is better located for pedestrian access to the CVT in terms of distance and the ability to use existing routes such as Bishops Court Road. Option 3 is located further from the CVT and is separated by the A376, which would need to be safely crossed to access this route.

Therefore, it is hard to fathom how Option 3 scores higher than Option 1 for walking (by 4 to 3). It is suggested that Option 1 should score higher than Option 3.

CYCLING

Again, the report acknowledges that cycling infrastructure is presently limited in the area, but states that Option 3 is close (within 1.5km) of National Cycle Route 2 (NCN2). This may be correct but it fails to mention that cyclists will have to cross the A376 and travel along Topsham Road to access this route. NCN2 is not immediately adjacent to Option 3 and so is not as convenient as the cycling score (4) suggests.

As already noted, it is our view that Option 1 is better located for the CVT, which will provide a direct, safe, green route to employment centres at the Science Park, Sky Park, and close access to Exeter Business Park and Sowton Industrial Estate. In addition, there is a traffic-free/advisory cycle route to the north of the A3052 from Westpoint that provides a route to Digby and Sowton train station and connects with other routes leading into Exeter city centre.

Therefore, it is difficult to comprehend why Option 3 scores higher than Option 1 for cycling (by 4 to 3). It is suggested that Option 1 and Option 3 should have similar scores for cycling (4 each).

PUBLIC TRANSPORT

The Report states that whilst “all three options have a good level of existing connectivity by bus,” high-quality public transport provision will be needed for all options.

The Report identifies that there are already bus services along the A3052. It is worth noting that these stops are located within 500m of the centre of land at Axehayes Farm, and that two Planning Inspectors have found the location to be “well related in sustainability terms” in recent Appeal decisions.

The Report states that Options 1 and 3 are well related to train stations located on the Avocet railway line and in Exeter itself.

Therefore, again it is difficult to see why Option 3 scores higher than Option 1 for public transport (by 5 to 4). Given it is acknowledged that services will need to be improved for all options, it is suggested that Option 1 and Option 3 should both score 4 for public transport.

REVISED SCORING

Given the above, it is suggested that the sustainable accessible assessment category scores should be adjusted as shown in Table 2 on page 55 of the attached document for the three categories (walking, cycling and public transport).

The above scoring would provide a better fit with the conclusions of the Sustainability Appraisal [Page 277], which concludes that Option 1 as having a major positive effect for connectivity and transport, with Option 3 only having a minor positive effect.

HIGHWAYS

The modelling undertaken by WSP, which was approved by Devon County Council, identifies that Option 1 has a lesser adverse effect upon the surrounding highway

network than Option 3. This is mainly due to the significant traffic impact that Option 3 has at the Clyst St Mary roundabout, and also at Junction 30 of the M5 motorway.

Various improvement options are identified in the report for the Clyst St Mary roundabout. Only two of these are deemed to be easily deliverable; namely the signalisation of the roundabout and the provision of a Park and Ride facility at Westpoint to reduce traffic flows through this junction. The latter could be provided on the Axehayes site as shown within the Vision Document appended to these representations. Given this, the score for the impact of Option 1 at the Clyst St Mary roundabout should be increased to 4 (from 3) and the deliverability score similarly increased to 5 (from 4). Indeed, it is odd how Option 2 and 3 have been awarded the same scores for the Clyst St Mary roundabout even though Table 7 in the WSP Technical Note clearly states that Option 3 has the “highest impact of the scenarios”.

The Report states that the East of Exeter Network will only be affected by Option 2. However, this seems hard to believe given that Option 3 will be accessed from the A376 according to the WSP Technical Note (along with an access onto the A3052 and B3179) and so some of this traffic will undoubtedly route onto the road network to the east and south of Clyst St Mary (as defined in Section 8.40 of the CBRE Report). Given this, the score for both the impact and deliverability of Option 3 on the East of Exeter Network should be decreased to 4 (from 5).

REVISED SCORING

The existing and revised scores for the highways assessment category are shown in Table 3 on page 56 of the attached document for the two categories identified above to reflect the findings of the Hydrock/WSP technical work more accurately.

UTILITIES

The Cherwell Group do not demure from the conclusions presented within Section 9 of the Assessment in relation to utilities.

NET ZERO CARBON ASSESSMENT

At this stage, the Cherwell Group consider that the scoring for net zero carbon is appropriate. That said, they question why para. 9.131 raises concerns about the proximity of Exeter Airport being a potential constraint for solar energy in Option 1. At Cranbrook, which is located adjacent to the Airport, solar photovoltaic solutions are actively promoted within the Development Plan.

The Cherwell Group also note that Option 1 performed better than Option 3 in the Sustainability Assessment on minimising carbon emissions [Page 270].

CLIMATE RESILIENCE

Appendix F of the Options Appraisal includes an assessment of each Option's resilience to climate change. Figures are provided within the assessment work. However, for each element of work the three options appear to be located to the north of the A3052 and to the south of the A30 (i.e. within Options 1 and 2). Consequently, the Cherwell Group are unsure as to whether the climate resilience work has assessed only sub-areas within Options 1 and 2 and not Option 3, or whether the figures presented within the work are inaccurate.

Given the above, the Cherwell Group reserved the right to comment on this work at subsequent stages of the plan-making process and have excluded climate resilience from their revised assessment work.

They do however note that the Sustainability Appraisal concluded that "Options 1 and 3 have similar overall climate resilience [Page 272]."

DELIVERABILITY

The Cherwell Group agree with the assessment work in relation to deliverability. They also agree that land assembly concerns reflect valuable lessons learnt at Cranbrook. We are also aware that the promoters of Option 1 have a proven record of delivering complex sites. The Cherwell Group are willing to work with other developers with land within Option 1 to bring forward a comprehensive development.

OVERALL SCORE

The revised assessment work presented above would result in the overall scores in Table 4 on page 57 of the attached document.

HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT

Land at Axehayes Farm was assessed in the HELAA as site GH/ED/52. The assessment work rightfully concludes that the site is suitable, available and achievable. The Cherwell Group agree with this conclusion. The work provided in the accompanying Vision Document also demonstrates that this conclusion is appropriate.

Notwithstanding the above, the technical work undertaken by the Cherwell Group indicates that some of the site's suitability assessment work in the HELAA is overly cautious. These matters are set out below:

Heritage - the HELAA assessment work concluded that the heritage sensitivity of the site is medium, as there is the potential for development to impact on Higher Holbrook Farm, which is a designated heritage asset. However, technical work prepared on behalf of the Cherwell Group by Orion Heritage concludes that "there was no direct intervisibility between the built heritage assets within the 1km study area and the study site due to distance, vegetation and topography." Consequently, the development of Axehayes Farm would not impact on the significance of any designated asset, including Higher Holbrook Farm.

Highways - The HELAA Panel concluded that there was a need for significant preparatory strategic highways improvements to allow for the site to be developed. This included delivering infrastructure to minimise impacts on Junctions 29 and 30 of the M5 Motorway. However, this conflicts with more recent evidence prepared on behalf of the Council which concludes that "development of 2,500 new homes up to the end of the Plan period could be accommodated without significant highways interventions [Executive Summary, Options Appraisal Technical Assessment – Summary, 'East Devon – Options Appraisal for a Potential New Settlement,' 2022]."

These revised conclusions should be reflected in an updated HELAA assessment for the subject site and the other evidence base documents that the HELAA has influenced.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: ///// PART 2
- CONTINUED FROM PART 1 67fe844e1dcf64001372fce3 /////

EMPLOYMENT LAND AND THE TOWN CENTRE

The proposed development at Axehayes Farm does not, as reflected in the Council's proposed masterplan for the second new community, propose any employment land or town centre uses. Consequently, the Cherwell Group do not provide any detailed comments regarding the proposals.

Notwithstanding the above, they are supportive of the provision of both employment land and town centre uses within the second new community, which will provide a strong fit with national planning policy [Para. 74 and 105 of the NPPF]. The provision of employment and town centre uses (housing a range of services and facilities) will be key components of the proposed new community. Both the employment and town centre uses will ensure that the daily needs of the residents of the new community are met, which will, by internalising trips, therefore limit the need to travel, which in turn will help to reduce congestion and emissions.

SOCIAL, COMMUNITY & EDUCATION FACILITIES AND OTHER INFRASTRUCTURE

The Cherwell Group acknowledge that to ensure that the second new community constitutes sustainable development, there will be a need for it to include social,

community and education facilities. For large-scale development such as that being proposed, this is a requirement of national planning policy [Para. 74 and 97 of the NPPF].

In regard to Policy WS01, it is noted that there will be a requirement for a full range of social, cultural, leisure, health, community and education facilities. This is not disputed by the Cherwell Group. Indeed, they will be an important placemaking component of the second new community. However, it is noted that a number of key evidence base documents that will be required to underpin the Local Plan, including the infrastructure delivery strategy for the new community, the playing pitch strategy and the open space strategy, have not, as yet, been produced. These will need to be published alongside the second Regulation 19 consultation in order to demonstrate that the proposals are justified and effective.

Indeed, it is highly likely that the social, community and education requirements for the new town will be informed by consultation with key infrastructure providers. These responses will need to be assessed to ensure that they satisfy the tests of Regulation 122(2) of the Community Infrastructure Levy Regulations and are afforded a prioritisation. As with the Cranbrook Plan, the prioritisation will be an important element of work so as to ensure that the development is a viable proposition.

We comment on the proposals shown in the Council's latest masterplanning work for an all-through school to be located within land that is within the control of the Cherwell Group in the masterplanning section below.

INFRASTRUCTURE

PUBLIC OPEN SPACE PROVISION

The Cherwell Group acknowledge that the new community will be required to provide on-site public open space provision. As stated in national planning policy, access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and has other wider benefits [Para. 102 of the NPPF].

However, national planning policy also states that policies should be based on robust and up-to-date assessment of needs for open space, sport and recreation and opportunities for new provision. At the time of writing, neither the playing pitch strategy nor the open space strategy has been published. As stated above, these documents will be required to be published alongside the second Regulation 19 consultation in order to demonstrate that the Council's masterplan proposals are deliverable within the land allocated in the emerging Local Plan for the new community, and therefore Policy WS01 is an effective and justified proposition.

SANG

As set out in para. 13.15 of the emerging Plan, the provision of SANG land forms a key element of mitigation for developments that are located within 10km of the Exe Estuary Special Protection Area (SPA) and the Pebblebed Heaths Special Area of Conservation (SAC). The emerging Plan's supporting text suggests that mitigation should be provided at a rate of 8ha per 1,000 population, which was the same requirement as set out in Policy CB14 of the Cranbrook Plan. However, unlike Policy CB14 of the Cranbrook Plan, an occupancy rate is not provided. To ensure that there is no ambiguity regarding the expectations for SANG land, an occupancy rate should be clearly stated within the emerging Plan.

ACTIVE, SUSTAINABLE TRANSPORT AND OTHER HIGHWAYS IMPROVEMENTS

As evidenced by AWP's joint commission, which is discussed in Section 2 above, the Cherwell Group are supportive of the transport strategy for the new community affording a priority to active and sustainable modes of transport as part of a wider 'vision and validate' approach. Indeed, alongside the mix of uses proposed within the development, it will ensure that journeys within the new community are capable of being made by active and sustainable modes of transport. This will not only reduce carbon emissions and have health benefits, but it will also potentially avoid physical infrastructure improvements. Active and sustainable transport connections will also be proposed to local destinations, including via the provision of park and rides and mobility hubs.

The Cherwell Group's masterplan, which is described in Section 2 above, incorporates the proposed pedestrian, cycle and highway connections proposed in AWP's work.

COMMUNITY ENERGY/HEATING AND ON-SITE RENEWABLE ENERGY PRODUCTION

The Cherwell Group comment on the emerging policy framework in relation to carbon reduction, district heating and renewable energy generation in Section 8 of these representations.

SURFACE WATER DRAINAGE

As set out in Section 2 above, on behalf of the wider consortium, AWP have prepared a surface water drainage strategy for the new community. It has, where relevant to Axehayes Farm, been incorporated into the Cherwell Group's masterplan.

NEW EDUCATION PROVISION

As indicated above, the Cherwell Group acknowledge that education provision will be an important component of social infrastructure within the new community that will help with place-making. They are therefore supportive of its provision on-site. They do, however, have concerns relating to the proposed location of the campus school. These concerns are set out below.

HIGH SPEED PROVISION

It is noted that the emerging policy requires the provision of high speed broadband. However, since December 2022, for new homes, it has been a requirement of Approved Document R of the Building Regulations for developments to provide: (1) gigabit-ready physical infrastructure necessary for gigabit-capable connections up to a network distribution point, or as close as is reasonably practicable where the developer does not have the right to access land up to that distribution point; and (2) subject to a costs cap, a functioning gigabit-capable connection.

As such, for residential development, it is considered that the policy requirement duplicates Building Regulations and therefore it does not serve a clear purpose.

Accordingly, it conflicts with national policy and should be removed from future iterations of the Plan.

WASTE TRANSFER STATION AND WASTE WATER TREATMENT WORKS

The Cherwell Group are aware of the need for a new waste water treatment works to serve the new development. They are also aware that the utility provider is currently undecided as to whether it should be located within the new community. Whilst the Cherwell Group are aware of its strategic need and if necessary, its location within the new community, it should not be at the expense of restricting delivery from it. Indeed, whilst the waste water treatment works is being constructed, existing capacity and if necessary, temporary package treatment works, should be utilised to ensure that housing delivery from the new community comes forward as early as possible.

STEWARDSHIP

Policy WS01 confirms that a town-wide stewardship vehicle and governance will be required early on in the planning and delivery process. There remains a requirement for the allocation wide masterplan to provide a stewardship strategy that provides full details of the governance structure, methods of funding the stewardship vehicle, details of the public spaces and community assets to be owned, managed and maintained by the stewardship vehicle and an indicative programme for the establishment of the proposed stewardship vehicle. It is noted that para. 4.8 of the Local Plan confirms that public spaces and community assets within the new community will need to remain in public ownership.

The Cherwell Group acknowledge that stewardship will be a critical component of the new community. They are also aware that, as the proposed new community is the second that will occur within East Devon, many of these considerations will have been debated previously at Cranbrook. The Cherwell Group is aware of an East Devon Cabinet Paper dated 28th July 2021, which discussed the various stewardship models that had been discussed in the context of Cranbrook, which by the time that the paper was written, was a thriving community, with the established Town Council providing effective local leadership.

The Paper discussed various stewardship models. It confirmed that initially within Cranbrook, as with many developments, an estate management company was responsible for, amongst other things, the management and maintenance of public spaces. This was funded by a management charge applied to each home. However, in 2018, public assets and services were transferred to Cranbrook Town Council, with their management and maintenance being funded through the parish precept and residents having their estate charge removed. This did not require any commuted sums to be paid by the developers to the Town Council, but is reflected on the Council Tax bill for each property.

Two further options were considered within the Cabinet Paper for the stewardship of assets; asset endowment and profit share. In terms of the former, LRM Planning have been involved in a development where such an approach was used, alongside a conventional estate charge.

As part of the Former Wisley Airfield development, a Stewardship Strategy and an In Perpetuity Funding Framework was agreed. Through that work it was agreed that the Wisley Airfield Community Trust would be established, which is a charitable trust responsible for the operation and maintenance of the community assets (after they were fully funded and built out) and the promotion of community activities to aid with placemaking. The Trust is to be governed by a board of Trustees including residents, the Council, the County Council, the Parish Council, specialist stakeholders, the developers and other business interest groups.

The Strategy and Framework confirms that the Trust is to be responsible for:

maintenance of public open spaces and community facilities;

the maintenance of the SANG land;

sustainable transport initiatives, including bus services and subsidy, e-bikes and car clubs;

costs for the Trust's staff and its ongoing operation; and

placemaking, including community development, activities and events.

A number of potential sources of revenue were identified, including:

an estate charge for each dwelling and commercial unit;

income from community assets, periodic income and charitable grants; and

a scheme of endowment, whereby a number of residential properties were gifted to the charitable trust to be let to private tenants to provide a long term and unrestricted income. Initially, 19 dwellings were endowed to the Trust.

Subject to viability, such an approach to delivering the stewardship of the new community over the longer-term would be supported by the Cherwell Group.

THE COUNCIL'S EMERGING MASTERPLAN

The Cherwell Group note that the Council's more detailed proposals for the new community will be published in the second Regulation 19 consultation later in 2025. They therefore understand that the Council's masterplanners will be continuing to work on the masterplan until that point and that the versions of the masterplan issued by the Council to the landowners in January 2025 is subject to change. However, in order to assist the Council in preparing their final masterplan, the Cherwell Group have the following comments on the most recent version of the masterplan shared in January 2025:

Park and ride – the park and ride is currently proposed to be located to the west of the proposed access from the A3052. It is within land that is not controlled by the Cherwell Group. As shown in the Cherwell Group's masterplan, which is provided in Appendix 2, there is sufficient room within land controlled by the Cherwell Group for the park and ride to be accommodated within their masterplan. To allow for its earlier delivery, the

park and ride should be relocated to the east of the proposed access road from the A3052 and within land controlled by the Cherwell Group.

Secondary school – the Cherwell Group note that the only secondary school proposed within the emerging masterplan is located in the north eastern area of the land under their control. However, Policy WS01 of the emerging Local Plan indicates that the preference is for the site to accommodate a “an education campus which will provide primary and secondary school places as well as provision for early years, pupils with special educational needs and Post 16.” There therefore seems to be a disconnect between the emerging Policy and the Council’s proposed masterplan. There is approximately a 2.25ha difference in size between a secondary school and an education campus. Analysis undertaken by the Cherwell Group’s masterplanner has indicated that there is not the sufficient quantum of land within the north eastern portion of the Cherwell Group’s landholding, of a suitable level, to accommodate an education campus and its ancillary infrastructure, including playing pitches. In order to ensure that the masterplan and therefore Policy WS01 of the emerging Local Plan is effective, there will be a need to relocate the school to an alternative location.

APPLICATION REQUIREMENTS

The emerging Policy requires proposals within the new community to progress in accordance with an agreed allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and a financial appraisal. Additionally, the Policy also confirms that a stewardship strategy is required as part of the site wide masterplan. Unless otherwise agreed with the Local Planning Authority, each planning application should accord with the approved documents.

The Cherwell Group has four principal concerns with these elements of the Policy, as follows:

To ensure that the emerging Policy is clearly written and unambiguous, the Plan should be clear as to what stage of the development management process the allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and the financial appraisal is required to be agreed (i.e. is it prior to the submission of the first application, or as part of it). In that regard we draw attention to the wording of the Cranbrook Expansion Area policies, which state that “the parameter plans shall be agreed in writing by the

Local Planning Authority as part of the first approval of any planning application for development...”

Again, to ensure that the emerging Policy is clearly written and unambiguous, there will be a need for the Policy to indicate how the allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and financial appraisal is required to be agreed.

As there is no obvious lead developer (i.e. with an overall controlling portion of the second new community), there will, given the significant implications that the allocation-wide masterplan, infrastructure delivery strategy, phasing strategy and financial appraisal will have on the deliverability of all development proposals within the new community, be a need for these elements of work to be undertaken with meaningful engagement with all landowners. Agreement should be reached with all members of the consortium before the work is approved by the Local Planning Authority. To ensure that Policy WS01 is effective, this should be specified in the wording of the Policy.

The Policy states that whilst the emerging Local Plan only allocates land to accommodate 8,000 new homes and supporting facilities and infrastructure, infrastructure capacity should take account of the ambition to grow the community by a further 2,000 homes, to 10,000 in the longer term. Whilst for some elements of infrastructure this could be a possibility, without any surety over where the additional development will be located, it may be difficult for others. For instance, what assumptions will or can be made about trip assignment in relation to junctions onto the existing public highway and the location of education provision, when the location of the additional 2,000 homes is unknown?

OTHER CONSIDERATIONS

LAND USE BUDGET

No land use budget has been provided with the current Local Plan consultation that can be used to demonstrate that the development proposed in the area of land allocated at Policy WS01 is deliverable and therefore effective. The Cherwell Group

reserves the right to provide further comment on this matter in future iterations of the Plan.

VIABILITY

Financial viability was a key consideration for the Cranbrook new community and it is likely to be for the second new community, particularly given the likely requirements for significant levels of infrastructure that will be necessary to support such a development. At Cranbrook, a detailed Infrastructure Delivery Plan was prepared to support the Cranbrook Plan. The Cherwell Group notes that the Local Planning Authority intends to publish an Infrastructure Delivery Plan for the second new community alongside the second Regulation 19 version of the Local Plan. The necessary infrastructure listed in that document and total costs for delivering the infrastructure will be key to understanding whether or not the new community is financially viable and therefore deliverable and in turn effective. The Cherwell Group therefore reserves the right to comment on the infrastructure delivery plan and the scheme's financial viability in their representations to future iterations of the Plan.

In addition, whilst the Community Infrastructure Levy is operational in parts of East Devon, the Local Planning Authority made Cranbrook exempt during the plan-making process. Instead, infrastructure has been secured through the conventional Section 106 process. The approach to funding and delivering infrastructure at the second new town needs early consideration and confirmation.

CONFORMITY WITH PARAGRAPH 74 OF THE NPPF

Para. 74 of the 2023 version of the NPPF confirms that the supply of new homes can often best be achieved through planning for larger scale development, such as new communities, provided they are:

well located;

well designed; and

are supported by necessary infrastructure and facilities.

Moreover, working with communities and other stakeholders, local planning authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

ensure that the size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development, or in larger towns to which there is good access;

set clear expectations for the quality of the places to be created and how this will be maintained;

ensure appropriate tools, such as masterplans and design codes are used to secure a variety of well-designed homes to meet the needs of different groups of the community;

make a realistic assessment of likely rates of delivery; and

consider whether it is appropriate to establish a Green Belt around or adjoining new developments of a significant size.

An assessment of how the new community proposed at Policy WS01 of the emerging Plan accords with each of these tests is set out below in turn.

WELL LOCATED

As has been demonstrated in Section 5 above, the new community provides a strong fit with the Plan's spatial strategy, which was assessed through the Sustainability Appraisal

and was found to be the preferred option. It mirrors the strategy employed in the Adopted Local Plan.

Moreover, three options for the location of the new community have been assessed within the evidence base supporting the Local Plan, including the Sustainability Appraisal. The location of the new community was again found to be the most appropriate when considering reasonable alternatives.

WELL DESIGNED

The Local Planning Authority's own assessment work underpinning the emerging Local Plan, the design work required by Policy WS01 of the emerging Local Plan, together with other more generic design related policy, including Policy DS01 and DS02, will ensure that the new community is well designed. SUPPORTED BY NECESSARY INFRASTRUCTURE AND FACILITIES

We understand that the Infrastructure Delivery Plan for the second new community, which will be published later in 2025, will establish the necessary infrastructure and facilities that will need to support the new community. This will ensure that the services and facilities required on a daily basis by the future residents of the new community will be available and can be accessed via active and sustainable modes of travel. It will also ensure that the impact of the development is mitigated.

EXISTING OR PLANNED INVESTMENT IN INFRASTRUCTURE

The location of the new community ensures that it is in close proximity to the strategically important Clyst Valley Regional Park, which aims to, amongst other things, connect communities with nature, by traffic free trails. The active travel strategy prepared by AWP ensures that the new community will provide active travel connections between the development and the Clyst Valley Regional Park, including via green connections, which will also provide a functional connection for the benefit of biodiversity interest.

The new community is also located in close proximity to an energy from waste facility. There are proposals for the facility to provide residual heat to the Cranbrook New Community and we understand that it could also supply heat for all or some of the second new community. Whilst, as discussed in Section 8 below, there are potentially other alternatives, it does, in the context of para. 73(a) of the 2023 version of the NPPF, constitute an opportunity presented by infrastructure.

ECONOMIC POTENTIAL

The employment land proposed within the new community will complement the existing and planned strategically important employment provision located within the western area of East Devon and on the eastern edge of Exeter.

NET GAINS TO BIODIVERSITY

An appropriate net gain to biodiversity can be achieved from the new community. Functional green connections are also proposed to the Clyst Valley Regional Park.

SERVICES, FACILITIES AND EMPLOYMENT OPPORTUNITIES WITHIN THE NEW COMMUNITY AND IN THE WIDER ENVIRONS

As set out in Policy WS01 of the emerging Local Plan, the new community will house a full range of social, community and education facilities, a town centre, a number of smaller neighbourhood centres and employment land. The new community will also be located in close proximity to the services, facilities and employment opportunities located within the West End, on the eastern edge of Exeter and within Exeter city centre.

EXPECTATIONS ABOUT THE QUALITY OF PLACE

The combination of the vision for the new community and the detailed policy framework provided by Policy WS01 of the emerging Local Plan, and more generic development management policies, ensure that there are clear expectations regarding the quality of the place.

MASTERPLAN AND DESIGN CODES

Policy WS01 and DS02 of the emerging Local Plan will require the submission of an allocation wide masterplan and a design code or codes.

REALISTIC ASSESSMENT OF RATES OF DELIVERY

The Cherwell Group provided an assessment of the anticipated rates of delivery in Section 6 above. They consider that whilst the rates of delivery for the new community are ambitious, they are aspirational, but deliverable.

GREEN BELT

The Cherwell Group do not consider it necessary for a Green Belt to be provided to the east of Exeter. The proposed new community benefits from strong defensible boundaries to the west, south and north, including the Clyst Valley Regional Park, the M5, the A3052 and the A30.

No such designation has been required for the Cranbrook New Community and it is considered that, if necessary, other development management policies would suffice. The Cherwell Group are aware that, for instance, Green Wedge designations have successfully been used at Cranbrook. Moreover, such a designation may impact on the ability for the Local Planning Authority to allocate land for the additional 2,000 homes that is to be made in a subsequent development plan document. Consequently, it is not considered that the tests of para. 144 of the NPPF have been met in this instance.

SUMMARY

It can be seen that the proposed new community strongly accords with para. 74 of the NPPF. It is therefore, in these terms, consistent with national planning policy.

SYNTHESIS

The Cherwell Group considers that, fundamentally, the second new town is a sound proposition. They consider that it is founded on robust evidence and provides a strong fit with national planning policy.

They have suggested a number of minor amendments to the proposed wording of Policy WS01. These suggested alterations are proposed to ensure that the allocation is both justified and effective.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: The Cherwell Group's comments on housing land supply are limited to the proposed second new community. Please see Section 6 of the attached representation (see below):

HOUSING SUPPLY

The following section of this representation provides a broad assessment of the proposed housing land supply contained within the East Devon Local Plan. It specifically concerns lead-in times associated with strategic sites, including the second new community.

LEAD-IN TIMES ASSOCIATED WITH THE SECOND NEW COMMUNITY

In order to meet the proposed housing requirement within the emerging Local Plan, the Local Planning Authority have rightfully identified the need for strategic housing allocations, including a second new community. Housing monitoring information published by the Local Planning Authority confirms that strategic allocations provided a valuable and consistent component of supply and will continue to do so.

For instance, over the period 2013/14 to 2023/24 the strategic allocations located within the West End alone have contributed just under 50% of total housing completions (4,932 homes out of 9,984 net total completions), with Cranbrook alone contributing approximately 29% of supply over the same timescale. Moreover, Table 14 of the latest Housing Monitoring Update continues to demonstrate that the expansion areas at Cranbrook will provide a valuable source of housing over the period 2026/27 to 2030/31 and beyond.

Notwithstanding the above, so as to ensure that the objectively assessed need for housing is deliverable over the plan period, which in turn will ensure that the emerging Local Plan is positively prepared, justified, effective and consistent with national policy, there is a need to ensure that the components of housing supply will deliver as anticipated by the Plan.

As the largest allocation proposed within the emerging Local Plan, the delivery assumptions for the second new community should be carefully considered. Indeed, para. 74(d) of the 2023 version of the NPPF confirms that when planning for largescale development, such as a new community, Local Planning Authorities should, amongst other things, make a realistic assessment of the likely rates of delivery, given their lead-in times, and identify opportunities for supporting their rapid implementation.

Reflecting on the delays in the delivery of the Cranbrook Expansion Areas (see para. 6.2 of the latest Housing Monitoring Report), it appears that the Local Planning Authority is, in order to speed up the rate of delivery from the second new community, advocating a conventional approach, with planning applications being submitted pursuant to Policy WS01, rather than, as was the case with the Cranbrook Expansion Areas, requiring the delivery of a second geographically specific development plan document.

Even with the accelerated option, it is likely that it will take a number of years to achieve first completions, with ordinarily, the following stages being required:

the pre-application advice process;

the submission and determination of an outline planning application (resolution to grant);

the completion of the Section 106 Legal Agreement;

site acquisition;

preparation of pre-reserved matters applications, such as a design code;

preparation of a reserved matters application;

submission and determination of a reserved matters application;

submission and discharge of any pre-commencement and pre-occupation planning conditions and obligations;

site clearance/infrastructure servicing; and

first legal completions.

Research undertaken by Lichfields [Lichfields, 'Start to Finish,' March 2024]. indicates that the median timeframe for an application of over 2,000 homes to be validated to the first detailed permission (which could be either an outline and a reserved matters application, or hybrid/full application) is 5.1 years. Whilst it is acknowledged that the new community is likely, given land ownerships, to be brought forward via multiple applications, which could seek permission for a smaller quantum of development on an individual basis, it provides a conservative, yet realistic timeframe for a development of the comprehensive scale being proposed. Lichfields then conclude that sites of over 2,000 dwellings will take between 1.4 and 1.7 years to move from the first planning permission to first occupations. Consequently, they predict that for a site of the scale of the proposed new community, the overall lead-in time to first completions is between six and seven years.

At a local level, the most obvious comparisons are the Expansion Areas at the Cranbrook New Community. An application on the Treasbeare Expansion Area was submitted at the end of July 2022. East Devon District Council resolved to grant approval on the Expansion Area in February 2023 and outline planning permission was approved in June 2024. Consequently, planning permission was achieved in just under two years. The Council's latest housing Monitoring Report confirms that first completions from the Expansion Area are forecast in monitoring year 2026/27. This analysis suggests that it will take five monitoring years from submission of the outline planning application to first completions at the Treasbeare Expansion Area. Consequently, there exists the potential to accelerate delivery from the new community beyond that advocated by Lichfields.

BUILD OUT RATES

Lichfields' analysis confirms that for developments of 2,000 dwellings or more, the average annual completion rate ranges from 100 to 188 dwellings per annum. They do, however, identify three sites where the annual average build-out rate was in excess of 200 dwellings per annum. Again, looking more locally, research by LRM Planning indicates that over the period 2012/13 to 2023/24, a total of 2,879 homes were constructed at Cranbrook, which provides an annual average completion rate of 240 homes. Delivery peaked in 2014/15 at just under 400 completions. This rate of delivery was also achieved whilst other developments in close proximity to Cranbrook and within the West End were also delivering, including Redhayes (Tithebarn Green/Mosshayne) and Pinhoe, which could have impacted on the 'absorption rate.' Again, it indicates that historically, annual average delivery rates at the upper end of Lichfields analysis have recently been achieved within the West End.

It is acknowledged that the rates of delivery from Cranbrook were achieved in differing economic circumstances, but equally delivery from the new community is envisaged over the medium and longer terms and therefore over a full economic cycle.

Moreover, Table 12 of the latest Housing Monitoring Update also envisaged an annual average delivery rate of 288 homes per annum from the Cranbrook Expansion Areas over the period 2026/27 to 2030/31. Excluding the first year of completions, which are ordinarily lower, annual average delivery rates are anticipated to be over 300 homes per annum.

LEAD-IN TIMES

The analysis undertaken by Lichfields suggests that it could take between six and seven years from the submission of a valid planning application to first legal completions. More locally, the Treasbeare Expansion Area is forecast to come forward within five monitoring years.

Based on more locally specific examples, and an assumption that at least one planning application on the new community would be submitted by the time of the Local Plan Examination in Public, a realistic lead-in time until first legal completions is set out in Table 1 on page 20 of the attached document.

On the basis of the lead-in times outlined in Table 1 above, this would leave 12 monitoring years for the 3,300 homes envisaged by Policy WS01 to be delivered by 2042 to be completed. This equates to an annual average delivery rate of 275 homes per annum. Whilst this represents an increase in the historic delivery rates at Cranbrook, it is a rate of delivery that has been achieved across the West End as a whole and it accords with the rate of delivery forecast from the Cranbrook Expansion Areas. Accordingly, it is considered that the planned provision proposed for the second new community is aspirational, but a deliverable proposition. Therefore, the quantum of development proposed for the second new community over the plan period (3,300 homes) will be effective.

However, the historic rates of delivery within the West End and Cranbrook were only achieved because multiple outlets were all delivering homes at the same time. To achieve the rates of delivery anticipated for the second new community within the emerging Local Plan, there will again be the need for multiple outlets delivering at least from both the north and the south simultaneously.

THE SECOND NEW COMMUNITY

Consistent with the Plan's spatial strategy, which has been demonstrated to be the most appropriate, Policy WS01 proposes the allocation of a second new community. Following an assessment of three potential options through both a discrete technical

assessment and via the Sustainability Appraisal, the Regulation 19 version of the Local Plan continues to identify land to the north of the A3052, east of the M5 and to the south of the A30 as being the preferred location for the second new community.

The Cherwell Group strongly supports the Local Planning Authority's assessment that a second new community is required in order to meet the housing requirement and agree with its proposed location. Indeed, as set out in Section 10 below, the Cherwell Group's own analysis of potential locations for the second new community would suggest that the Local Planning Authority's own assessment work underplays the scoring for the proposed location for the new community.

However, their concerns only strengthen the conclusions presented within the Local Planning Authority's assessment work; that Option 1 is the most sustainable option and has rightfully been taken forward as the preferred option in the consultation version of the Local Plan.

Notwithstanding the above, this section of these representations does not focus on the evidence base underpinning the emerging Local Plan, but instead focuses on Policy WS01 of the emerging Local Plan, and the Local Plan's Policies Map.

The Cherwell Group's comments on these matters is provided below.

POLICIES MAP

Whilst not a document that will be subject of Examination, the Cherwell Group are supportive of the Policies Map, which allocates land at Axehayes Farm as part of the wider second new community.

Having regard to the technical work prepared by the Cherwell Group and the Local Planning Authority, the site's allocation is a justified proposition. The development proposed on the site will help to ensure that Policy WS01 and therefore the wider Local Plan, is deliverable and therefore effective.

HOUSING

The emerging Local Plan proposes that around 3,300 new homes will be brought forward on land allocated within the proposed new community in the period up to 2042, with a further 4,700 new homes to follow in the period after 2042. The Local Planning Authority also proposes to increase the size of the new community by a further 2,000 homes, to 10,000 homes, over the longer term.

As set out in the section above, in the period up to 2042, in order for the housing provision envisaged from the second new community to be delivered in full, there is likely to be the need to adopt an average annual rate of delivery of around 275 homes per annum. It has been demonstrated above that whilst this rate of delivery is aspirational, it is deliverable and therefore effective.

In order to achieve the required annual average rate of delivery from the new community, it is highly likely that multiple development locations, each delivering housing at the same time, will be required. This will require development to occur from at least the north and south development nodes. With each development node having multiple outlets, it is likely that the rate of delivery could be achieved. In this regard it is noted that the HELAA methodology states that sites of this scale (or in this case nodes given the geographical area of the second new community) could deliver 150 homes per annum.

FORMS OF HOUSING

The Cherwell Group intend, as is proposed to be required by the emerging Local Plan, for a range of types, sizes and tenures of homes to be provided. Housing will be provided to meet the needs of the community, including families, those that want to build or commission their own homes and the elderly.

PHASING

The Cherwell Group are aware that the Local Planning Authority's advisors have prepared an indicative phasing strategy. It shows Axehayes Farm as coming forward in

the period to 2042. Such an approach would ensure that development closest to the services, facilities and employment opportunities within Exeter would come forward in advance of more peripheral locations to the east. It would help to ensure that the required sustainable and active travel connections within the western areas of the southern development node of the proposed new community come forward before development to the east.

DENSITY

The Policy sets an expectation that there will be a site wide density of 45 dwellings per hectare, with higher density of at least 55 to 60 dwellings per hectare within the town centre, neighbourhood centres and around key destinations and transport hubs.

Based on the land use budget contained within the landowner presentation provided by the Council's consultants, the Cherwell Group have a number of concerns with this approach, including:

the topography across the wider new community presents a significant challenge. Achieving consistent gross densities of 45dph in sloping areas is unlikely to be feasible without compromising on quality design, accessibility and placemaking;

the calculations underpinning the masterplan appear to be based on gross density, which does not reflect how density is actually delivered in residential parcels. Once incidental open space, existing landscape features that will need to be retained and infrastructure (including streets) are factored in, the net density within development parcels would need to be considerably higher, potentially pushing beyond what the local market can realistically support;

in order to achieve these density requirements, the housing mix would need to be skewed heavily towards higher density typologies, which may not reflect local housing need or demand.

These concerns will need to be responded to in the next consultation version of the Regulation 19 Plan.

GYPSY AND TRAVELLER

Policy WS01 of the emerging Local Plan seeks the provision of 30 Gypsy and Traveller pitches within the new community, of which 15 will be provided in the period up to 2042.

The Cherwell Group acknowledges that the Council has a duty to meet the housing needs of the Gypsy and Traveller community. However, the Cherwell Group have a number of issues with the approach being adopted by the Local Planning Authority, which include:

the need for Gypsy and Traveller provision;

the location of the proposed Gypsy and Traveller provision;

reasonable alternatives; and

viability.

THE NEED FOR GYPSY AND TRAVELLER PROVISION

The Gypsy and Traveller Accommodation Assessment (GTAA) confirms that the following provision is required over the plan period to 2042:

Gypsy and Traveller provision that met the planning definition – 18 pitches;

undetermined Gypsy and Traveller need – up to 7 pitches;

Gypsy and Travellers that do not meet the planning definition – 4 pitches; and

Travelling Showpeople – 0 pitches.

At most, there is a need for 29 pitches, although as stated in the Council's GTAA, it is envisaged that the needs of households that were assessed as part of the evidence base work that do not fall within the definition of Annex 1 of the national planning policy for traveller sites "should be met as part of the general housing need [ORS, East Devon District Council Gypsy and Traveller Accommodation Assessment (2024), para. 8.5]." Consequently, there is a need for 25 pitches over the plan period.

The assessment work does not include an assessment of provision that benefits from planning permission, but which has not, as yet, come forward. In that regard we note that planning permission has been secured for 15 pitches from the Cobdens [Application 22/0406/MOUT] and Treasbeare Expansion Areas [Application 22/1532/MOUT]. If, as is suggested by the document, this additional provision has not been included in the assessment, then the residual requirement would reduce to just 10 pitches.

The Cherwell Group are also aware that Policy WS11 of the emerging Local Plan proposes to allocate land to the east of the M5 for at least five pitches. Consequently, on a worst case basis, including assuming that no Gypsy and Traveller provision came forward through criteria-based Policy HN09, then there would be a residual requirement for only five pitches.

To plan for a higher quantum, without the necessary evidence to suggest that it is required, would not be a justified approach.

Over the longer-term, it would appear that there is limited evidence to suggest that there is a need for a further 15 pitches in the period post 2042. The Local Planning Authority's evidence base work only establishes needs between 2023 and 2045. It only identifies a further need for three additional pitches in the period between 2042 and 2045. It does not suggest that there is a need for a further 15 pitches beyond the plan period. Consequently, it would be an unjustified strategy to plan for this additional provision at this stage. Instead, it is considered that the additional provision post 2042 should, if it is to be provided within the second new community, be considered as part of the subsequent development plan document that will allocate the additional 2,000

homes required to ensure that the new community reaches 10,000 homes in total. That would ensure that the requirement is evidenced and would therefore be a justified strategy.

THE LOCATION OF THE PROPOSED GYPSY AND TRAVELLER PROVISION

Without prejudice to the points made above, should there be a need for Gypsy and Traveller provision to be made within the second new community, then its/their location will need to be carefully considered. There will be a need to ensure that, amongst other things, the chosen site or sites is/are suitable from a topographical, landscape and access perspective. Experience from the Cranbrook development would also indicate that noise is a significant constraint given the inability for noise mitigation to be provided for trailers. This could suggest a location divorced from existing noise sources, including the strategic transport network and existing employment sites, would be more appropriate.

Moreover, previous studies have highlighted the A30 as being a key travelling route [Devon Partnership, Gypsy and Traveller Accommodation Assessment, 2015]. As such, a location in close proximity to that strategic route could be appropriate.

REASONABLE ALTERNATIVES

The emerging Local Plan only proposes to make two allocations to meet the needs of the Gypsy and Traveller community; within Policies WS01 and HN09 of the emerging Local Plan. Other than these two options, both of which are allocated for development, there does not appear to be any assessment of other reasonable alternatives within the District where the housing needs of the Gypsy and Traveller community could be met.

This is particularly important, as the evidence base underpinning the spatial strategy confirms that the most preferable distribution of development would see 60% of housing need met within the West End. However, having regard to the committed Gypsy and Traveller development within Cranbrook and proposed allocations WS01 and HN09, 100% of the Gypsy and Traveller need is proposed to be focused in the West End. This appears to conflict with the conclusions of the evidence base and is not, therefore, a justified proposition.

VIABILITY

Evidence prepared in support of the Cranbrook Plan demonstrated that the proposed Gypsy and Traveller provision from the Expansion Areas would have resulted in a financial loss. Cranbrook Plan Document PSD36 confirmed that the cost for constructing the 15 Gypsy and Traveller pitches within the Cranbrook Expansion Areas would be £1,808,000. Cranbrook Plan Document PSD21a confirms that the values of the Gypsy and Traveller plots was, at that time, £55,000, giving a total value for the 15 pitches of £825,000. Consequently, a loss of £983,000 was predicted. We are aware that since the Cranbrook Plan was made, developers are now, via the Section 106 Legal Agreements, required to construct the pitches at their cost, and transfer them for £1 to the Local Planning Authority. Consequently, their construction cost will be a cost borne to the wider development.

Given the above, and assuming that there is a requirement for the development to provide the constructed pitches, as there was at Cranbrook, in order to ensure that the new community is an effective proposition, the loss associated with the Gypsy and Traveller provision should be fully reflected within any viability assessment.

///// END OF PART 1 - CONTINUED IN PART 2 681e28d51b45340013f4e2ce /////

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: N/A

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: N/A

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:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.: *HOUSING SUPPLY*

The following section of this representation provides a broad assessment of the proposed housing land supply contained within the East Devon Local Plan. It specifically concerns lead-in times associated with strategic sites, including the second new community.

LEAD-IN TIMES ASSOCIATED WITH THE SECOND NEW COMMUNITY

In order to meet the proposed housing requirement within the emerging Local Plan, the Local Planning Authority have rightfully identified the need for strategic housing allocations, including a second new community. Housing monitoring information published by the Local Planning Authority confirms that strategic allocations provided a valuable and consistent component of supply and will continue to do so.

For instance, over the period 2013/14 to 2023/24 the strategic allocations located within the West End alone have contributed just under 50% of total housing completions (4,932 homes out of 9,984 net total completions), with Cranbrook alone contributing approximately 29% of supply over the same timescale. Moreover, Table 14 of the latest Housing Monitoring Update continues to demonstrate that the expansion

areas at Cranbrook will provide a valuable source of housing over the period 2026/27 to 2030/31 and beyond.

Notwithstanding the above, so as to ensure that the objectively assessed need for housing is deliverable over the plan period, which in turn will ensure that the emerging Local Plan is positively prepared, justified, effective and consistent with national policy, there is a need to ensure that the components of housing supply will deliver as anticipated by the Plan.

As the largest allocation proposed within the emerging Local Plan, the delivery assumptions for the second new community should be carefully considered. Indeed, para. 74(d) of the 2023 version of the NPPF confirms that when planning for largescale development, such as a new community, Local Planning Authorities should, amongst other things, make a realistic assessment of the likely rates of delivery, given their lead-in times, and identify opportunities for supporting their rapid implementation.

Reflecting on the delays in the delivery of the Cranbrook Expansion Areas (see para. 6.2 of the latest Housing Monitoring Report), it appears that the Local Planning Authority is, in order to speed up the rate of delivery from the second new community, advocating a conventional approach, with planning applications being submitted pursuant to Policy WS01, rather than, as was the case with the Cranbrook Expansion Areas, requiring the delivery of a second geographically specific development plan document.

Even with the accelerated option, it is likely that it will take a number of years to achieve first completions, with ordinarily, the following stages being required:

the pre-application advice process;

the submission and determination of an outline planning application (resolution to grant);

the completion of the Section 106 Legal Agreement;

site acquisition;

preparation of pre-reserved matters applications, such as a design code;

preparation of a reserved matters application;

submission and determination of a reserved matters application;

submission and discharge of any pre-commencement and pre-occupation planning conditions and obligations;

site clearance/infrastructure servicing; and

first legal completions.

Research undertaken by Lichfields [Lichfields, 'Start to Finish,' March 2024]. indicates that the median timeframe for an application of over 2,000 homes to be validated to the first detailed permission (which could be either an outline and a reserved matters application, or hybrid/full application) is 5.1 years. Whilst it is acknowledged that the new community is likely, given land ownerships, to be brought forward via multiple applications, which could seek permission for a smaller quantum of development on an individual basis, it provides a conservative, yet realistic timeframe for a development of the comprehensive scale being proposed. Lichfields then conclude that sites of over 2,000 dwellings will take between 1.4 and 1.7 years to move from the first planning permission to first occupations. Consequently, they predict that for a site of the scale of the proposed new community, the overall lead-in time to first completions is between six and seven years.

At a local level, the most obvious comparisons are the Expansion Areas at the Cranbrook New Community. An application on the Treasbeare Expansion Area was submitted at the end of July 2022. East Devon District Council resolved to grant approval on the Expansion Area in February 2023 and outline planning permission was approved in June 2024. Consequently, planning permission was achieved in just under

two years. The Council's latest housing Monitoring Report confirms that first completions from the Expansion Area are forecast in monitoring year 2026/27. This analysis suggests that it will take five monitoring years from submission of the outline planning application to first completions at the Treasbeare Expansion Area. Consequently, there exists the potential to accelerate delivery from the new community beyond that advocated by Lichfields.

BUILD OUT RATES

Lichfields' analysis confirms that for developments of 2,000 dwellings or more, the average annual completion rate ranges from 100 to 188 dwellings per annum. They do, however, identify three sites where the annual average build-out rate was in excess of 200 dwellings per annum. Again, looking more locally, research by LRM Planning indicates that over the period 2012/13 to 2023/24, a total of 2,879 homes were constructed at Cranbrook, which provides an annual average completion rate of 240 homes. Delivery peaked in 2014/15 at just under 400 completions. This rate of delivery was also achieved whilst other developments in close proximity to Cranbrook and within the West End were also delivering, including Redhayes (Tithebarn Green/Mosshayne) and Pinhoe, which could have impacted on the 'absorption rate.' Again, it indicates that historically, annual average delivery rates at the upper end of Lichfields analysis have recently been achieved within the West End.

It is acknowledged that the rates of delivery from Cranbrook were achieved in differing economic circumstances, but equally delivery from the new community is envisaged over the medium and longer terms and therefore over a full economic cycle.

Moreover, Table 12 of the latest Housing Monitoring Update also envisaged an annual average delivery rate of 288 homes per annum from the Cranbrook Expansion Areas over the period 2026/27 to 2030/31. Excluding the first year of completions, which are ordinarily lower, annual average delivery rates are anticipated to be over 300 homes per annum.

LEAD-IN TIMES

The analysis undertaken by Lichfields suggests that it could take between six and seven years from the submission of a valid planning application to first legal completions. More locally, the Treasbeare Expansion Area is forecast to come forward within five monitoring years.

Based on more locally specific examples, and an assumption that at least one planning application on the new community would be submitted by the time of the Local Plan Examination in Public, a realistic lead-in time until first legal completions is set out in Table 1 on page 20 of the attached document.

On the basis of the lead-in times outlined in Table 1 above, this would leave 12 monitoring years for the 3,300 homes envisaged by Policy WS01 to be delivered by 2042 to be completed. This equates to an annual average delivery rate of 275 homes per annum. Whilst this represents an increase in the historic delivery rates at Cranbrook, it is a rate of delivery that has been achieved across the West End as a whole and it accords with the rate of delivery forecast from the Cranbrook Expansion Areas. Accordingly, it is considered that the planned provision proposed for the second new community is aspirational, but a deliverable proposition. Therefore, the quantum of development proposed for the second new community over the plan period (3,300 homes) will be effective.

However, the historic rates of delivery within the West End and Cranbrook were only achieved because multiple outlets were all delivering homes at the same time. To achieve the rates of delivery anticipated for the second new community within the emerging Local Plan, there will again be the need for multiple outlets delivering at least from both the north and the south simultaneously.

THE SECOND NEW COMMUNITY

Consistent with the Plan's spatial strategy, which has been demonstrated to be the most appropriate, Policy WS01 proposes the allocation of a second new community. Following an assessment of three potential options through both a discrete technical assessment and via the Sustainability Appraisal, the Regulation 19 version of the Local Plan continues to identify land to the north of the A3052, east of the M5 and to the south of the A30 as being the preferred location for the second new community.

The Cherwell Group strongly supports the Local Planning Authority's assessment that a second new community is required in order to meet the housing requirement and agree with its proposed location. Indeed, as set out in Section 10 below, the Cherwell Group's own analysis of potential locations for the second new community would suggest that the Local Planning Authority's own assessment work underplays the scoring for the proposed location for the new community.

However, their concerns only strengthen the conclusions presented within the Local Planning Authority's assessment work; that Option 1 is the most sustainable option and has rightfully been taken forward as the preferred option in the consultation version of the Local Plan.

Notwithstanding the above, this section of these representations does not focus on the evidence base underpinning the emerging Local Plan, but instead focuses on Policy WS01 of the emerging Local Plan, and the Local Plan's Policies Map.

The Cherwell Group's comments on these matters is provided below.

POLICIES MAP

Whilst not a document that will be subject of Examination, the Cherwell Group are supportive of the Policies Map, which allocates land at Axehayes Farm as part of the wider second new community.

Having regard to the technical work prepared by the Cherwell Group and the Local Planning Authority, the site's allocation is a justified proposition. The development proposed on the site will help to ensure that Policy WS01 and therefore the wider Local Plan, is deliverable and therefore effective.

HOUSING

The emerging Local Plan proposes that around 3,300 new homes will be brought forward on land allocated within the proposed new community in the period up to 2042,

with a further 4,700 new homes to follow in the period after 2042. The Local Planning Authority also proposes to increase the size of the new community by a further 2,000 homes, to 10,000 homes, over the longer term.

As set out in the section above, in the period up to 2042, in order for the housing provision envisaged from the second new community to be delivered in full, there is likely to be the need to adopt an average annual rate of delivery of around 275 homes per annum. It has been demonstrated above that whilst this rate of delivery is aspirational, it is deliverable and therefore effective.

In order to achieve the required annual average rate of delivery from the new community, it is highly likely that multiple development locations, each delivering housing at the same time, will be required. This will require development to occur from at least the north and south development nodes. With each development node having multiple outlets, it is likely that the rate of delivery could be achieved. In this regard it is noted that the HELAA methodology states that sites of this scale (or in this case nodes given the geographical area of the second new community) could deliver 150 homes per annum.

FORMS OF HOUSING

The Cherwell Group intend, as is proposed to be required by the emerging Local Plan, for a range of types, sizes and tenures of homes to be provided. Housing will be provided to meet the needs of the community, including families, those that want to build or commission their own homes and the elderly.

PHASING

The Cherwell Group are aware that the Local Planning Authority's advisors have prepared an indicative phasing strategy. It shows Axehayes Farm as coming forward in the period to 2042. Such an approach would ensure that development closest to the services, facilities and employment opportunities within Exeter would come forward in advance of more peripheral locations to the east. It would help to ensure that the required sustainable and active travel connections within the western areas of the

southern development node of the proposed new community come forward before development to the east.

DENSITY

The Policy sets an expectation that there will be a site wide density of 45 dwellings per hectare, with higher density of at least 55 to 60 dwellings per hectare within the town centre, neighbourhood centres and around key destinations and transport hubs.

Based on the land use budget contained within the landowner presentation provided by the Council's consultants, the Cherwell Group have a number of concerns with this approach, including:

the topography across the wider new community presents a significant challenge. Achieving consistent gross densities of 45dph in sloping areas is unlikely to be feasible without compromising on quality design, accessibility and placemaking;

the calculations underpinning the masterplan appear to be based on gross density, which does not reflect how density is actually delivered in residential parcels. Once incidental open space, existing landscape features that will need to be retained and infrastructure (including streets) are factored in, the net density within development parcels would need to be considerably higher, potentially pushing beyond what the local market can realistically support;

in order to achieve these density requirements, the housing mix would need to be skewed heavily towards higher density typologies, which may not reflect local housing need or demand.

These concerns will need to be responded to in the next consultation version of the Regulation 19 Plan.

GYPSY AND TRAVELLER

Policy WS01 of the emerging Local Plan seeks the provision of 30 Gypsy and Traveller pitches within the new community, of which 15 will be provided in the period up to 2042.

The Cherwell Group acknowledges that the Council has a duty to meet the housing needs of the Gypsy and Traveller community. However, the Cherwell Group have a number of issues with the approach being adopted by the Local Planning Authority, which include:

the need for Gypsy and Traveller provision;

the location of the proposed Gypsy and Traveller provision;

reasonable alternatives; and

viability.

THE NEED FOR GYPSY AND TRAVELLER PROVISION

The Gypsy and Traveller Accommodation Assessment (GTAA) confirms that the following provision is required over the plan period to 2042:

Gypsy and Traveller provision that met the planning definition – 18 pitches;

undetermined Gypsy and Traveller need – up to 7 pitches;

Gypsy and Travellers that do not meet the planning definition – 4 pitches; and

Travelling Showpeople – 0 pitches.

At most, there is a need for 29 pitches, although as stated in the Council's GTAA, it is envisaged that the needs of households that were assessed as part of the evidence base work that do not fall within the definition of Annex 1 of the national planning policy for traveller sites "should be met as part of the general housing need [ORS , East Devon District Council Gypsy and Traveller Accommodation Assessment (2024), para. 8.5]." Consequently, there is a need for 25 pitches over the plan period.

The assessment work does not include an assessment of provision that benefits from planning permission, but which has not, as yet, come forward. In that regard we note that planning permission has been secured for 15 pitches from the Cobdens [Application 22/0406/MOUT] and Treasbeare Expansion Areas [Application 22/1532/MOUT]. If, as is suggested by the document, this additional provision has not been included in the assessment, then the residual requirement would reduce to just 10 pitches.

The Cherwell Group are also aware that Policy WS11 of the emerging Local Plan proposes to allocate land to the east of the M5 for at least five pitches. Consequently, on a worst case basis, including assuming that no Gypsy and Traveller provision came forward through criteria-based Policy HN09, then there would be a residual requirement for only five pitches.

To plan for a higher quantum, without the necessary evidence to suggest that it is required, would not be a justified approach.

Over the longer-term, it would appear that there is limited evidence to suggest that there is a need for a further 15 pitches in the period post 2042. The Local Planning Authority's evidence base work only establishes needs between 2023 and 2045. It only identifies a further need for three additional pitches in the period between 2042 and 2045. It does not suggest that there is a need for a further 15 pitches beyond the plan period. Consequently, it would be an unjustified strategy to plan for this additional provision at this stage. Instead, it is considered that the additional provision post 2042 should, if it is to be provided within the second new community, be considered as part of the subsequent development plan document that will allocate the additional 2,000 homes required to ensure that the new community reaches 10,000 homes in total. That would ensure that the requirement is evidenced and would therefore be a justified strategy.

THE LOCATION OF THE PROPOSED GYPSY AND TRAVELLER PROVISION

Without prejudice to the points made above, should there be a need for Gypsy and Traveller provision to be made within the second new community, then its/their location will need to be carefully considered. There will be a need to ensure that, amongst other things, the chosen site or sites is/are suitable from a topographical, landscape and access perspective. Experience from the Cranbrook development would also indicate that noise is a significant constraint given the inability for noise mitigation to be provided for trailers. This could suggest a location divorced from existing noise sources, including the strategic transport network and existing employment sites, would be more appropriate.

Moreover, previous studies have highlighted the A30 as being a key travelling route [Devon Partnership, Gypsy and Traveller Accommodation Assessment, 2015]. As such, a location in close proximity to that strategic route could be appropriate.

REASONABLE ALTERNATIVES

The emerging Local Plan only proposes to make two allocations to meet the needs of the Gypsy and Traveller community; within Policies WS01 and HN09 of the emerging Local Plan. Other than these two options, both of which are allocated for development, there does not appear to be any assessment of other reasonable alternatives within the District where the housing needs of the Gypsy and Traveller community could be met.

This is particularly important, as the evidence base underpinning the spatial strategy confirms that the most preferable distribution of development would see 60% of housing need met within the West End. However, having regard to the committed Gypsy and Traveller development within Cranbrook and proposed allocations WS01 and HN09, 100% of the Gypsy and Traveller need is proposed to be focused in the West End. This appears to conflict with the conclusions of the evidence base and is not, therefore, a justified proposition.

VIABILITY

Evidence prepared in support of the Cranbrook Plan demonstrated that the proposed Gypsy and Traveller provision from the Expansion Areas would have resulted in a financial loss. Cranbrook Plan Document PSD36 confirmed that the cost for constructing the 15 Gypsy and Traveller pitches within the Cranbrook Expansion Areas would be £1,808,000. Cranbrook Plan Document PSD21a confirms that the values of the Gypsy and Traveller plots was, at that time, £55,000, giving a total value for the 15 pitches of £825,000. Consequently, a loss of £983,000 was predicted. We are aware that since the Cranbrook Plan was made, developers are now, via the Section 106 Legal Agreements, required to construct the pitches at their cost, and transfer them for £1 to the Local Planning Authority. Consequently, their construction cost will be a cost borne to the wider development.

Given the above, and assuming that there is a requirement for the development to provide the constructed pitches, as there was at Cranbrook, in order to ensure that the new community is an effective proposition, the loss associated with the Gypsy and Traveller provision should be fully reflected within any viability assessment.

EMPLOYMENT LAND AND THE TOWN CENTRE

The proposed development at Axehayes Farm does not, as reflected in the Council's proposed masterplan for the second new community, propose any employment land or town centre uses. Consequently, the Cherwell Group do not provide any detailed comments regarding the proposals.

Notwithstanding the above, they are supportive of the provision of both employment land and town centre uses within the second new community, which will provide a strong fit with national planning policy [Para. 74 and 105 of the NPPF]. The provision of employment and town centre uses (housing a range of services and facilities) will be key components of the proposed new community. Both the employment and town centre uses will ensure that the daily needs of the residents of the new community are met, which will, by internalising trips, therefore limit the need to travel, which in turn will help to reduce congestion and emissions.

SOCIAL, COMMUNITY & EDUCATION FACILITIES AND OTHER INFRASTRUCTURE

The Cherwell Group acknowledge that to ensure that the second new community constitutes sustainable development, there will be a need for it to include social, community and education facilities. For large-scale development such as that being proposed, this is a requirement of national planning policy [Para. 74 and 97 of the NPPF].

In regard to Policy WS01, it is noted that there will be a requirement for a full range of social, cultural, leisure, health, community and education facilities. This is not disputed by the Cherwell Group. Indeed, they will be an important placemaking component of the second new community. However, it is noted that a number of key evidence base documents that will be required to underpin the Local Plan, including the infrastructure delivery strategy for the new community, the playing pitch strategy and the open space strategy, have not, as yet, been produced. These will need to be published alongside the second Regulation 19 consultation in order to demonstrate that the proposals are justified and effective.

Indeed, it is highly likely that the social, community and education requirements for the new town will be informed by consultation with key infrastructure providers. These responses will need to be assessed to ensure that they satisfy the tests of Regulation 122(2) of the Community Infrastructure Levy Regulations and are afforded a prioritisation. As with the Cranbrook Plan, the prioritisation will be an important element of work so as to ensure that the development is a viable proposition.

We comment on the proposals shown in the Council's latest masterplanning work for an all-through school to be located within land that is within the control of the Cherwell Group in the masterplanning section below.

INFRASTRUCTURE

PUBLIC OPEN SPACE PROVISION

The Cherwell Group acknowledge that the new community will be required to provide on-site public open space provision. As stated in national planning policy, access to a network of high quality open spaces and opportunities for sport and physical activity is

important for the health and well-being of communities and has other wider benefits [Para. 102 of the NPPF].

However, national planning policy also states that policies should be based on robust and up-to-date assessment of needs for open space, sport and recreation and opportunities for new provision. At the time of writing, neither the playing pitch strategy nor the open space strategy has been published. As stated above, these documents will be required to be published alongside the second Regulation 19 consultation in order to demonstrate that the Council's masterplan proposals are deliverable within the land allocated in the emerging Local Plan for the new community, and therefore Policy WS01 is an effective and justified proposition.

SANG

As set out in para. 13.15 of the emerging Plan, the provision of SANG land forms a key element of mitigation for developments that are located within 10km of the Exe Estuary Special Protection Area (SPA) and the Pebblebed Heaths Special Area of Conservation (SAC). The emerging Plan's supporting text suggests that mitigation should be provided at a rate of 8ha per 1,000 population, which was the same requirement as set out in Policy CB14 of the Cranbrook Plan. However, unlike Policy CB14 of the Cranbrook Plan, an occupancy rate is not provided. To ensure that there is no ambiguity regarding the expectations for SANG land, an occupancy rate should be clearly stated within the emerging Plan.

ACTIVE, SUSTAINABLE TRANSPORT AND OTHER HIGHWAYS IMPROVEMENTS

As evidenced by AWP's joint commission, which is discussed in Section 2 above, the Cherwell Group are supportive of the transport strategy for the new community affording a priority to active and sustainable modes of transport as part of a wider 'vision and validate' approach. Indeed, alongside the mix of uses proposed within the development, it will ensure that journeys within the new community are capable of being made by active and sustainable modes of transport. This will not only reduce carbon emissions and have health benefits, but it will also potentially avoid physical infrastructure improvements. Active and sustainable transport connections will also be proposed to local destinations, including via the provision of park and rides and mobility hubs.

The Cherwell Group's masterplan, which is described in Section 2 above, incorporates the proposed pedestrian, cycle and highway connections proposed in AWP's work.

COMMUNITY ENERGY/HEATING AND ON-SITE RENEWABLE ENERGY PRODUCTION

The Cherwell Group comment on the emerging policy framework in relation to carbon reduction, district heating and renewable energy generation in Section 8 of these representations.

SURFACE WATER DRAINAGE

As set out in Section 2 above, on behalf of the wider consortium, AWP have prepared a surface water drainage strategy for the new community. It has, where relevant to Axehayes Farm, been incorporated into the Cherwell Group's masterplan.

NEW EDUCATION PROVISION

As indicated above, the Cherwell Group acknowledge that education provision will be an important component of social infrastructure within the new community that will help with place-making. They are therefore supportive of its provision on-site. They do, however, have concerns relating to the proposed location of the campus school. These concerns are set out below.

HIGH SPEED PROVISION

It is noted that the emerging policy requires the provision of high speed broadband. However, since December 2022, for new homes, it has been a requirement of Approved Document R of the Building Regulations for developments to provide: (1) gigabit-ready physical infrastructure necessary for gigabit-capable connections up to a network distribution point, or as close as is reasonably practicable where the developer does not have the right to access land up to that distribution point; and (2) subject to a costs cap, a functioning gigabit-capable connection.

As such, for residential development, it is considered that the policy requirement duplicates Building Regulations and therefore it does not serve a clear purpose. Accordingly, it conflicts with national policy and should be removed from future iterations of the Plan.

WASTE TRANSFER STATION AND WASTE WATER TREATMENT WORKS

The Cherwell Group are aware of the need for a new waste water treatment works to serve the new development. They are also aware that the utility provider is currently undecided as to whether it should be located within the new community. Whilst the Cherwell Group are aware of its strategic need and if necessary, its location within the new community, it should not be at the expense of restricting delivery from it. Indeed, whilst the waste water treatment works is being constructed, existing capacity and if necessary, temporary package treatment works, should be utilised to ensure that housing delivery from the new community comes forward as early as possible.

STEWARDSHIP

Policy WS01 confirms that a town-wide stewardship vehicle and governance will be required early on in the planning and delivery process. There remains a requirement for the allocation wide masterplan to provide a stewardship strategy that provides full details of the governance structure, methods of funding the stewardship vehicle, details of the public spaces and community assets to be owned, managed and maintained by the stewardship vehicle and an indicative programme for the establishment of the proposed stewardship vehicle. It is noted that para. 4.8 of the Local Plan confirms that public spaces and community assets within the new community will need to remain in public ownership.

The Cherwell Group acknowledge that stewardship will be a critical component of the new community. They are also aware that, as the proposed new community is the second that will occur within East Devon, many of these considerations will have been debated previously at Cranbrook. The Cherwell Group is aware of an East Devon Cabinet Paper dated 28th July 2021, which discussed the various stewardship models that had been discussed in the context of Cranbrook, which by the time that the paper

was written, was a thriving community, with the established Town Council providing effective local leadership.

The Paper discussed various stewardship models. It confirmed that initially within Cranbrook, as with many developments, an estate management company was responsible for, amongst other things, the management and maintenance of public spaces. This was funded by a management charge applied to each home. However, in 2018, public assets and services were transferred to Cranbrook Town Council, with their management and maintenance being funded through the parish precept and residents having their estate charge removed. This did not require any commuted sums to be paid by the developers to the Town Council, but is reflected on the Council Tax bill for each property.

Two further options were considered within the Cabinet Paper for the stewardship of assets; asset endowment and profit share. In terms of the former, LRM Planning have been involved in a development where such an approach was used, alongside a conventional estate charge.

As part of the Former Wisley Airfield development, a Stewardship Strategy and an In Perpetuity Funding Framework was agreed. Through that work it was agreed that the Wisley Airfield Community Trust would be established, which is a charitable trust responsible for the operation and maintenance of the community assets (after they were fully funded and built out) and the promotion of community activities to aid with placemaking. The Trust is to be governed by a board of Trustees including residents, the Council, the County Council, the Parish Council, specialist stakeholders, the developers and other business interest groups.

///// END OF PART 1 - CONTINUED IN PART 2 681e2a3d441db300135c5f3c /////

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

N/A

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: *HOUSING SUPPLY*

The following section of this representation provides a broad assessment of the proposed housing land supply contained within the East Devon Local Plan. It specifically concerns lead-in times associated with strategic sites, including the second new community.

LEAD-IN TIMES ASSOCIATED WITH THE SECOND NEW COMMUNITY

In order to meet the proposed housing requirement within the emerging Local Plan, the Local Planning Authority have rightfully identified the need for strategic housing allocations, including a second new community. Housing monitoring information published by the Local Planning Authority confirms that strategic allocations provided a valuable and consistent component of supply and will continue to do so.

For instance, over the period 2013/14 to 2023/24 the strategic allocations located within the West End alone have contributed just under 50% of total housing completions (4,932 homes out of 9,984 net total completions), with Cranbrook alone contributing approximately 29% of supply over the same timescale. Moreover, Table 14 of the latest Housing Monitoring Update continues to demonstrate that the expansion areas at Cranbrook will provide a valuable source of housing over the period 2026/27 to 2030/31 and beyond.

Notwithstanding the above, so as to ensure that the objectively assessed need for housing is deliverable over the plan period, which in turn will ensure that the emerging Local Plan is positively prepared, justified, effective and consistent with national policy, there is a need to ensure that the components of housing supply will deliver as anticipated by the Plan.

As the largest allocation proposed within the emerging Local Plan, the delivery assumptions for the second new community should be carefully considered. Indeed, para. 74(d) of the 2023 version of the NPPF confirms that when planning for largescale development, such as a new community, Local Planning Authorities should, amongst other things, make a realistic assessment of the likely rates of delivery, given their lead-in times, and identify opportunities for supporting their rapid implementation.

Reflecting on the delays in the delivery of the Cranbrook Expansion Areas (see para. 6.2 of the latest Housing Monitoring Report), it appears that the Local Planning Authority is, in order to speed up the rate of delivery from the second new community, advocating a conventional approach, with planning applications being submitted pursuant to Policy WS01, rather than, as was the case with the Cranbrook Expansion Areas, requiring the delivery of a second geographically specific development plan document.

Even with the accelerated option, it is likely that it will take a number of years to achieve first completions, with ordinarily, the following stages being required:

the pre-application advice process;

the submission and determination of an outline planning application (resolution to grant);

the completion of the Section 106 Legal Agreement;

site acquisition;

preparation of pre-reserved matters applications, such as a design code;

preparation of a reserved matters application;

submission and determination of a reserved matters application;

submission and discharge of any pre-commencement and pre-occupation planning conditions and obligations;

site clearance/infrastructure servicing; and

first legal completions.

Research undertaken by Lichfields [Lichfields, 'Start to Finish,' March 2024]. indicates that the median timeframe for an application of over 2,000 homes to be validated to the first detailed permission (which could be either an outline and a reserved matters application, or hybrid/full application) is 5.1 years. Whilst it is acknowledged that the new community is likely, given land ownerships, to be brought forward via multiple applications, which could seek permission for a smaller quantum of development on an individual basis, it provides a conservative, yet realistic timeframe for a development of the comprehensive scale being proposed. Lichfields then conclude that sites of over 2,000 dwellings will take between 1.4 and 1.7 years to move from the first planning permission to first occupations. Consequently, they predict that for a site of the scale of the proposed new community, the overall lead-in time to first completions is between six and seven years.

At a local level, the most obvious comparisons are the Expansion Areas at the Cranbrook New Community. An application on the Treasbeare Expansion Area was submitted at the end of July 2022. East Devon District Council resolved to grant approval on the Expansion Area in February 2023 and outline planning permission was approved in June 2024. Consequently, planning permission was achieved in just under two years. The Council's latest housing Monitoring Report confirms that first completions from the Expansion Area are forecast in monitoring year 2026/27. This analysis suggests that it will take five monitoring years from submission of the outline planning application to first completions at the Treasbeare Expansion Area. Consequently, there exists the potential to accelerate delivery from the new community beyond that advocated by Lichfields.

BUILD OUT RATES

Lichfields' analysis confirms that for developments of 2,000 dwellings or more, the average annual completion rate ranges from 100 to 188 dwellings per annum. They do, however, identify three sites where the annual average build-out rate was in excess of 200 dwellings per annum. Again, looking more locally, research by LRM Planning indicates that over the period 2012/13 to 2023/24, a total of 2,879 homes were constructed at Cranbrook, which provides an annual average completion rate of 240 homes. Delivery peaked in 2014/15 at just under 400 completions. This rate of delivery was also achieved whilst other developments in close proximity to Cranbrook and

within the West End were also delivering, including Redhayes (Tithebarn Green/Mosshayne) and Pinhoe, which could have impacted on the ‘absorption rate.’ Again, it indicates that historically, annual average delivery rates at the upper end of Lichfields analysis have recently been achieved within the West End.

It is acknowledged that the rates of delivery from Cranbrook were achieved in differing economic circumstances, but equally delivery from the new community is envisaged over the medium and longer terms and therefore over a full economic cycle.

Moreover, Table 12 of the latest Housing Monitoring Update also envisaged an annual average delivery rate of 288 homes per annum from the Cranbrook Expansion Areas over the period 2026/27 to 2030/31. Excluding the first year of completions, which are ordinarily lower, annual average delivery rates are anticipated to be over 300 homes per annum.

LEAD-IN TIMES

The analysis undertaken by Lichfields suggests that it could take between six and seven years from the submission of a valid planning application to first legal completions. More locally, the Treasbeare Expansion Area is forecast to come forward within five monitoring years.

Based on more locally specific examples, and an assumption that at least one planning application on the new community would be submitted by the time of the Local Plan Examination in Public, a realistic lead-in time until first legal completions is set out in Table 1 on page 20 of the attached document.

On the basis of the lead-in times outlined in Table 1 above, this would leave 12 monitoring years for the 3,300 homes envisaged by Policy WS01 to be delivered by 2042 to be completed. This equates to an annual average delivery rate of 275 homes per annum. Whilst this represents an increase in the historic delivery rates at Cranbrook, it is a rate of delivery that has been achieved across the West End as a whole and it accords with the rate of delivery forecast from the Cranbrook Expansion Areas. Accordingly, it is considered that the planned provision proposed for the second new community is aspirational, but a deliverable proposition. Therefore, the quantum of

development proposed for the second new community over the plan period (3,300 homes) will be effective.

However, the historic rates of delivery within the West End and Cranbrook were only achieved because multiple outlets were all delivering homes at the same time. To achieve the rates of delivery anticipated for the second new community within the emerging Local Plan, there will again be the need for multiple outlets delivering at least from both the north and the south simultaneously.

THE SECOND NEW COMMUNITY

Consistent with the Plan's spatial strategy, which has been demonstrated to be the most appropriate, Policy WS01 proposes the allocation of a second new community. Following an assessment of three potential options through both a discrete technical assessment and via the Sustainability Appraisal, the Regulation 19 version of the Local Plan continues to identify land to the north of the A3052, east of the M5 and to the south of the A30 as being the preferred location for the second new community.

The Cherwell Group strongly supports the Local Planning Authority's assessment that a second new community is required in order to meet the housing requirement and agree with its proposed location. Indeed, as set out in Section 10 below, the Cherwell Group's own analysis of potential locations for the second new community would suggest that the Local Planning Authority's own assessment work underplays the scoring for the proposed location for the new community.

However, their concerns only strengthen the conclusions presented within the Local Planning Authority's assessment work; that Option 1 is the most sustainable option and has rightfully been taken forward as the preferred option in the consultation version of the Local Plan.

Notwithstanding the above, this section of these representations does not focus on the evidence base underpinning the emerging Local Plan, but instead focuses on Policy WS01 of the emerging Local Plan, and the Local Plan's Policies Map.

The Cherwell Group's comments on these matters is provided below.

POLICIES MAP

Whilst not a document that will be subject of Examination, the Cherwell Group are supportive of the Policies Map, which allocates land at Axehayes Farm as part of the wider second new community.

Having regard to the technical work prepared by the Cherwell Group and the Local Planning Authority, the site's allocation is a justified proposition. The development proposed on the site will help to ensure that Policy WS01 and therefore the wider Local Plan, is deliverable and therefore effective.

HOUSING

The emerging Local Plan proposes that around 3,300 new homes will be brought forward on land allocated within the proposed new community in the period up to 2042, with a further 4,700 new homes to follow in the period after 2042. The Local Planning Authority also proposes to increase the size of the new community by a further 2,000 homes, to 10,000 homes, over the longer term.

As set out in the section above, in the period up to 2042, in order for the housing provision envisaged from the second new community to be delivered in full, there is likely to be the need to adopt an average annual rate of delivery of around 275 homes per annum. It has been demonstrated above that whilst this rate of delivery is aspirational, it is deliverable and therefore effective.

In order to achieve the required annual average rate of delivery from the new community, it is highly likely that multiple development locations, each delivering housing at the same time, will be required. This will require development to occur from at least the north and south development nodes. With each development node having multiple outlets, it is likely that the rate of delivery could be achieved. In this regard it is noted that the HELAA methodology states that sites of this scale (or in this case nodes

given the geographical area of the second new community) could deliver 150 homes per annum.

FORMS OF HOUSING

The Cherwell Group intend, as is proposed to be required by the emerging Local Plan, for a range of types, sizes and tenures of homes to be provided. Housing will be provided to meet the needs of the community, including families, those that want to build or commission their own homes and the elderly.

PHASING

The Cherwell Group are aware that the Local Planning Authority's advisors have prepared an indicative phasing strategy. It shows Axehayes Farm as coming forward in the period to 2042. Such an approach would ensure that development closest to the services, facilities and employment opportunities within Exeter would come forward in advance of more peripheral locations to the east. It would help to ensure that the required sustainable and active travel connections within the western areas of the southern development node of the proposed new community come forward before development to the east.

DENSITY

The Policy sets an expectation that there will be a site wide density of 45 dwellings per hectare, with higher density of at least 55 to 60 dwellings per hectare within the town centre, neighbourhood centres and around key destinations and transport hubs.

Based on the land use budget contained within the landowner presentation provided by the Council's consultants, the Cherwell Group have a number of concerns with this approach, including:

the topography across the wider new community presents a significant challenge. Achieving consistent gross densities of 45dph in sloping areas is unlikely to be feasible without compromising on quality design, accessibility and placemaking;

the calculations underpinning the masterplan appear to be based on gross density, which does not reflect how density is actually delivered in residential parcels. Once incidental open space, existing landscape features that will need to be retained and infrastructure (including streets) are factored in, the net density within development parcels would need to be considerably higher, potentially pushing beyond what the local market can realistically support;

in order to achieve these density requirements, the housing mix would need to be skewed heavily towards higher density typologies, which may not reflect local housing need or demand.

These concerns will need to be responded to in the next consultation version of the Regulation 19 Plan.

GYPSY AND TRAVELLER

Policy WS01 of the emerging Local Plan seeks the provision of 30 Gypsy and Traveller pitches within the new community, of which 15 will be provided in the period up to 2042.

The Cherwell Group acknowledges that the Council has a duty to meet the housing needs of the Gypsy and Traveller community. However, the Cherwell Group have a number of issues with the approach being adopted by the Local Planning Authority, which include:

the need for Gypsy and Traveller provision;

the location of the proposed Gypsy and Traveller provision;

reasonable alternatives; and

viability.

THE NEED FOR GYPSY AND TRAVELLER PROVISION

The Gypsy and Traveller Accommodation Assessment (GTAA) confirms that the following provision is required over the plan period to 2042:

Gypsy and Traveller provision that met the planning definition – 18 pitches;

undetermined Gypsy and Traveller need – up to 7 pitches;

Gypsy and Travellers that do not meet the planning definition – 4 pitches; and

Travelling Showpeople – 0 pitches.

At most, there is a need for 29 pitches, although as stated in the Council's GTAA, it is envisaged that the needs of households that were assessed as part of the evidence base work that do not fall within the definition of Annex 1 of the national planning policy for traveller sites "should be met as part of the general housing need [ORS, East Devon District Council Gypsy and Traveller Accommodation Assessment (2024), para. 8.5]." Consequently, there is a need for 25 pitches over the plan period.

The assessment work does not include an assessment of provision that benefits from planning permission, but which has not, as yet, come forward. In that regard we note that planning permission has been secured for 15 pitches from the Cobdens [Application 22/0406/MOUT] and Treasbeare Expansion Areas [Application 22/1532/MOUT]. If, as is suggested by the document, this additional provision has not been included in the assessment, then the residual requirement would reduce to just 10 pitches.

The Cherwell Group are also aware that Policy WS11 of the emerging Local Plan proposes to allocate land to the east of the M5 for at least five pitches. Consequently, on a worst case basis, including assuming that no Gypsy and Traveller provision came forward through criteria-based Policy HN09, then there would be a residual requirement for only five pitches.

To plan for a higher quantum, without the necessary evidence to suggest that it is required, would not be a justified approach.

Over the longer-term, it would appear that there is limited evidence to suggest that there is a need for a further 15 pitches in the period post 2042. The Local Planning Authority's evidence base work only establishes needs between 2023 and 2045. It only identifies a further need for three additional pitches in the period between 2042 and 2045. It does not suggest that there is a need for a further 15 pitches beyond the plan period. Consequently, it would be an unjustified strategy to plan for this additional provision at this stage. Instead, it is considered that the additional provision post 2042 should, if it is to be provided within the second new community, be considered as part of the subsequent development plan document that will allocate the additional 2,000 homes required to ensure that the new community reaches 10,000 homes in total. That would ensure that the requirement is evidenced and would therefore be a justified strategy.

THE LOCATION OF THE PROPOSED GYPSY AND TRAVELLER PROVISION

Without prejudice to the points made above, should there be a need for Gypsy and Traveller provision to be made within the second new community, then its/their location will need to be carefully considered. There will be a need to ensure that, amongst other things, the chosen site or sites is/are suitable from a topographical, landscape and access perspective. Experience from the Cranbrook development would also indicate that noise is a significant constraint given the inability for noise mitigation to be provided for trailers. This could suggest a location divorced from existing noise sources, including the strategic transport network and existing employment sites, would be more appropriate.

Moreover, previous studies have highlighted the A30 as being a key travelling route [Devon Partnership, Gypsy and Traveller Accommodation Assessment, 2015]. As such, a location in close proximity to that strategic route could be appropriate.

REASONABLE ALTERNATIVES

The emerging Local Plan only proposes to make two allocations to meet the needs of the Gypsy and Traveller community; within Policies WS01 and HN09 of the emerging Local Plan. Other than these two options, both of which are allocated for development, there does not appear to be any assessment of other reasonable alternatives within the District where the housing needs of the Gypsy and Traveller community could be met.

This is particularly important, as the evidence base underpinning the spatial strategy confirms that the most preferable distribution of development would see 60% of housing need met within the West End. However, having regard to the committed Gypsy and Traveller development within Cranbrook and proposed allocations WS01 and HN09, 100% of the Gypsy and Traveller need is proposed to be focused in the West End. This appears to conflict with the conclusions of the evidence base and is not, therefore, a justified proposition.

VIABILITY

Evidence prepared in support of the Cranbrook Plan demonstrated that the proposed Gypsy and Traveller provision from the Expansion Areas would have resulted in a financial loss. Cranbrook Plan Document PSD36 confirmed that the cost for constructing the 15 Gypsy and Traveller pitches within the Cranbrook Expansion Areas would be £1,808,000. Cranbrook Plan Document PSD21a confirms that the values of the Gypsy and Traveller plots was, at that time, £55,000, giving a total value for the 15 pitches of £825,000. Consequently, a loss of £983,000 was predicted. We are aware that since the Cranbrook Plan was made, developers are now, via the Section 106 Legal Agreements, required to construct the pitches at their cost, and transfer them for £1 to the Local Planning Authority. Consequently, their construction cost will be a cost borne to the wider development.

Given the above, and assuming that there is a requirement for the development to provide the constructed pitches, as there was at Cranbrook, in order to ensure that the new community is an effective proposition, the loss associated with the Gypsy and Traveller provision should be fully reflected within any viability assessment.

EMPLOYMENT LAND AND THE TOWN CENTRE

The proposed development at Axehayes Farm does not, as reflected in the Council's proposed masterplan for the second new community, propose any employment land or town centre uses. Consequently, the Cherwell Group do not provide any detailed comments regarding the proposals.

Notwithstanding the above, they are supportive of the provision of both employment land and town centre uses within the second new community, which will provide a strong fit with national planning policy [Para. 74 and 105 of the NPPF]. The provision of employment and town centre uses (housing a range of services and facilities) will be key components of the proposed new community. Both the employment and town centre uses will ensure that the daily needs of the residents of the new community are met, which will, by internalising trips, therefore limit the need to travel, which in turn will help to reduce congestion and emissions.

SOCIAL, COMMUNITY & EDUCATION FACILITIES AND OTHER INFRASTRUCTURE

The Cherwell Group acknowledge that to ensure that the second new community constitutes sustainable development, there will be a need for it to include social, community and education facilities. For large-scale development such as that being proposed, this is a requirement of national planning policy [Para. 74 and 97 of the NPPF].

In regard to Policy WS01, it is noted that there will be a requirement for a full range of social, cultural, leisure, health, community and education facilities. This is not disputed by the Cherwell Group. Indeed, they will be an important placemaking component of the second new community. However, it is noted that a number of key evidence base documents that will be required to underpin the Local Plan, including the infrastructure delivery strategy for the new community, the playing pitch strategy and the open space

strategy, have not, as yet, been produced. These will need to be published alongside the second Regulation 19 consultation in order to demonstrate that the proposals are justified and effective.

Indeed, it is highly likely that the social, community and education requirements for the new town will be informed by consultation with key infrastructure providers. These responses will need to be assessed to ensure that they satisfy the tests of Regulation 122(2) of the Community Infrastructure Levy Regulations and are afforded a prioritisation. As with the Cranbrook Plan, the prioritisation will be an important element of work so as to ensure that the development is a viable proposition.

We comment on the proposals shown in the Council's latest masterplanning work for an all-through school to be located within land that is within the control of the Cherwell Group in the masterplanning section below.

INFRASTRUCTURE

PUBLIC OPEN SPACE PROVISION

The Cherwell Group acknowledge that the new community will be required to provide on-site public open space provision. As stated in national planning policy, access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and has other wider benefits [Para. 102 of the NPPF].

However, national planning policy also states that policies should be based on robust and up-to-date assessment of needs for open space, sport and recreation and opportunities for new provision. At the time of writing, neither the playing pitch strategy nor the open space strategy has been published. As stated above, these documents will be required to be published alongside the second Regulation 19 consultation in order to demonstrate that the Council's masterplan proposals are deliverable within the land allocated in the emerging Local Plan for the new community, and therefore Policy WS01 is an effective and justified proposition.

SANG

As set out in para. 13.15 of the emerging Plan, the provision of SANG land forms a key element of mitigation for developments that are located within 10km of the Exe Estuary Special Protection Area (SPA) and the Pebblebed Heaths Special Area of Conservation (SAC). The emerging Plan's supporting text suggests that mitigation should be provided at a rate of 8ha per 1,000 population, which was the same requirement as set out in Policy CB14 of the Cranbrook Plan. However, unlike Policy CB14 of the Cranbrook Plan, an occupancy rate is not provided. To ensure that there is no ambiguity regarding the expectations for SANG land, an occupancy rate should be clearly stated within the emerging Plan.

ACTIVE, SUSTAINABLE TRANSPORT AND OTHER HIGHWAYS IMPROVEMENTS

As evidenced by AWP's joint commission, which is discussed in Section 2 above, the Cherwell Group are supportive of the transport strategy for the new community affording a priority to active and sustainable modes of transport as part of a wider 'vision and validate' approach. Indeed, alongside the mix of uses proposed within the development, it will ensure that journeys within the new community are capable of being made by active and sustainable modes of transport. This will not only reduce carbon emissions and have health benefits, but it will also potentially avoid physical infrastructure improvements. Active and sustainable transport connections will also be proposed to local destinations, including via the provision of park and rides and mobility hubs.

The Cherwell Group's masterplan, which is described in Section 2 above, incorporates the proposed pedestrian, cycle and highway connections proposed in AWP's work.

COMMUNITY ENERGY/HEATING AND ON-SITE RENEWABLE ENERGY PRODUCTION

The Cherwell Group comment on the emerging policy framework in relation to carbon reduction, district heating and renewable energy generation in Section 8 of these representations.

SURFACE WATER DRAINAGE

As set out in Section 2 above, on behalf of the wider consortium, AWP have prepared a surface water drainage strategy for the new community. It has, where relevant to Axehayes Farm, been incorporated into the Cherwell Group's masterplan.

NEW EDUCATION PROVISION

As indicated above, the Cherwell Group acknowledge that education provision will be an important component of social infrastructure within the new community that will help with place-making. They are therefore supportive of its provision on-site. They do, however, have concerns relating to the proposed location of the campus school. These concerns are set out below.

HIGH SPEED PROVISION

It is noted that the emerging policy requires the provision of high speed broadband. However, since December 2022, for new homes, it has been a requirement of Approved Document R of the Building Regulations for developments to provide: (1) gigabit-ready physical infrastructure necessary for gigabit-capable connections up to a network distribution point, or as close as is reasonably practicable where the developer does not have the right to access land up to that distribution point; and (2) subject to a costs cap, a functioning gigabit-capable connection.

As such, for residential development, it is considered that the policy requirement duplicates Building Regulations and therefore it does not serve a clear purpose. Accordingly, it conflicts with national policy and should be removed from future iterations of the Plan.

WASTE TRANSFER STATION AND WASTE WATER TREATMENT WORKS

The Cherwell Group are aware of the need for a new waste water treatment works to serve the new development. They are also aware that the utility provider is currently

undecided as to whether it should be located within the new community. Whilst the Cherwell Group are aware of its strategic need and if necessary, its location within the new community, it should not be at the expense of restricting delivery from it. Indeed, whilst the waste water treatment works is being constructed, existing capacity and if necessary, temporary package treatment works, should be utilised to ensure that housing delivery from the new community comes forward as early as possible.

STEWARDSHIP

Policy WS01 confirms that a town-wide stewardship vehicle and governance will be required early on in the planning and delivery process. There remains a requirement for the allocation wide masterplan to provide a stewardship strategy that provides full details of the governance structure, methods of funding the stewardship vehicle, details of the public spaces and community assets to be owned, managed and maintained by the stewardship vehicle and an indicative programme for the establishment of the proposed stewardship vehicle. It is noted that para. 4.8 of the Local Plan confirms that public spaces and community assets within the new community will need to remain in public ownership.

The Cherwell Group acknowledge that stewardship will be a critical component of the new community. They are also aware that, as the proposed new community is the second that will occur within East Devon, many of these considerations will have been debated previously at Cranbrook. The Cherwell Group is aware of an East Devon Cabinet Paper dated 28th July 2021, which discussed the various stewardship models that had been discussed in the context of Cranbrook, which by the time that the paper was written, was a thriving community, with the established Town Council providing effective local leadership.

The Paper discussed various stewardship models. It confirmed that initially within Cranbrook, as with many developments, an estate management company was responsible for, amongst other things, the management and maintenance of public spaces. This was funded by a management charge applied to each home. However, in 2018, public assets and services were transferred to Cranbrook Town Council, with their management and maintenance being funded through the parish precept and residents having their estate charge removed. This did not require any commuted sums to be paid by the developers to the Town Council, but is reflected on the Council Tax bill for each property.

Two further options were considered within the Cabinet Paper for the stewardship of assets; asset endowment and profit share. In terms of the former, LRM Planning have been involved in a development where such an approach was used, alongside a conventional estate charge.

As part of the Former Wisley Airfield development, a Stewardship Strategy and an In Perpetuity Funding Framework was agreed. Through that work it was agreed that the Wisley Airfield Community Trust would be established, which is a charitable trust responsible for the operation and maintenance of the community assets (after they were fully funded and built out) and the promotion of community activities to aid with placemaking. The Trust is to be governed by a board of Trustees including residents, the Council, the County Council, the Parish Council, specialist stakeholders, the developers and other business interest groups.

///// END OF PART 1 - CONTINUED IN PART 2 681e2a3d441db300135c5f3c /////

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: N/A

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: We have made some suggestions within Section 7 (see 'The Second New Community') of the attached representation to improve the justification, effectiveness and consistency with national planning policy of Policy WS01. Importantly, the suggested changes do not materially alter our view that Policy WS01 is fundamentally sound.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.: We have made some suggestions within Section 7 of the attached representation to improve the justification, effectiveness and consistency with national planning policy of Policy WS01. Importantly, the suggested changes do not materially alter our view that Policy WS01 is fundamentally sound.

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: N/A

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: Alex Bullock

Organisation (where relevant): LVA

Other party name (if relevant): Clyst Honiton LVA LLP

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: We note that the wording of the Policy makes clear that there is a future or longer term aspiration for the new community to deliver at least 10,000 homes albeit the first 8,000 new homes are to be allocated within the Policies Plan. We welcome the recognition of the opportunity that exist to grow the community to the 10,000 scale. We note that the Council suggests that the community will get to 10,000 to be informed by further work.

We consider that the Council could ear mark future directions for growth on the Policies Plan as there are limited directions the settlement could grow and there would be nothing preventative to indicate these as options now and these would naturally sit outside the red line allocation boundary. We note that the wording of the Policy makes clear that there is a future or longer term aspiration for the new community to deliver at least 10,000 homes albeit the first 8,000 new homes are to be allocated within the Policies Plan. We welcome the recognition of the opportunity that exist to grow the community to the 10,000 scale. We note that the Council suggests that the community will get to 10,000 to be informed by further work.

Whilst we understand why the Council wishes to consider the accommodation of at least 10,000 homes in the future we are somewhat concerned by some of the wording within the policy as is currently drafted as on the one hand it appears to suggest that only information is known now for 8,000 but that capacity and needs work should take

account of achieving 10,000 homes. Accordingly, it is important that within the evidence base that accompanies the final plan makes this distinction clear as to what is required for this plan period and what any extra over might be required to unlock dwellings beyond this plan period. This is again of relevance because of the 8,000 only 3,300 are anticipated to be delivered up to 2042 with the balance (4,700) post 2042.

Masterplan We note that the policy as worded requires “Development will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis.”. LVA can confirm that a good deal of collaboration is already underway amongst the key landowners within the proposed allocation. We consider it however important that further guidance is given as to the expectations of how the Council will resolve what is an agreed masterplan and how that approval process takes place, given that this involves multiple landowners with their individual aspirations and considerations some of which are fully aligned and some which require further discussion. The Policy makes clear the expectation to start development within this plan period. We consider that whilst this is a perfectly reasonable aspiration and one which the key stakeholders are committed to, but in order to facilitate this ambition careful consideration must be given to the timing of infrastructure delivery and ensuring that the phasing is structured such that the opening up of the Site can be achieved from multiple points. This is important because to deliver the associated infrastructure and aspirations around a town centre needs to be supported by multiple outlets being facilitated at an early stage. We hope therefore that the secondary Regulation 19 consultation will provide further guidance on the details of the requirements for the masterplan, noting it is crucial to understand the level of detail, who the process is to be led by, how approval is given. We understand that at this stage it is not the Council’s intention to produce something equivalent to the Cranbrook Plan as a separate DPD.

Affordable Housing We note that the Policy cross refers in respect of affordable housing to the requirements of Policy HN02: Affordable Housing. When that is reviewed it is noted that this is to be the subject of further viability work and this will be defined within the secondary Regulation 19 consultation. We reserve our right to comment on this detail in due course but we would highlight the need to have a robust and detailed evidence base of the infrastructure requirements and the associated phasing of delivery in order to ensure that the parties have appropriate time to review and consider the evidence that the Council is preparing.

Density The policy makes clear the intention to achieve an average density of at least 45 dwellings per hectare, with high density housing of at least 55-60 dwellings per hectare within the town and neighbourhood centres and around key destinations and transport hubs. Whilst we believe at this stage this is achievable it is unclear as to whether compliance with aspects such as this are necessary to be approved within the aforementioned masterplan or this is assessment under individual applications. It is of note that achieving such densities needs careful consideration and the Council may need to be pragmatic in meeting the requirements of Policy HN01 as there could well be tension in this regard.

Town and Neighbourhood

Centres We further highlight that further clarity should be provided as to the expectations of what the town centres and neighbourhood centres are to deliver as in a more general spatial planning context the needs of such locations today are vastly different from those which are seen within existing towns across England particularly focussing on changes in habits of around where consumers make purchases and the move away from traditional high street formats. It is of equal importance that if the Council wishes to redress the mistakes of Cranbrook and seek the early delivery of the town and neighbourhood centres, this is likely to require the opening up of the Site from multiple points so as to achieve critical mass to serve such locations in a timely manner but equally the co-location of key community facilities to such locations. The infrastructure requirements of any new community are substantial and careful consideration must be given to phasing (noting the aspiration of 5 hectares being completed and operational by 2042) and realistic aspirations provided and we hope that this level of detail features as part of the next element of the Regulation 19 consultation.

Social, Community and Educational Facilities In a similar manner to other parts of our response the amount of information within the policy in this regard is limited and we anticipate further clarification will be provided in the forthcoming focussed consultation. We agree that the timing of delivery of education infrastructure is of crucial importance and this needs to be considered alongside its spatial provision. It is equally the case, given infrastructure delivery costs that this is factored into viability assessment as it is likely to be a number of years before such facilities will be operational and if they are to be delivered early then careful planning in respect of infrastructure phasing is a necessity.

Infrastructure We recognise and support the need for the timely provision of an Infrastructure Delivery Plan which will set out the key infrastructure requirements. This is to be welcomed but essential in our view for this to feature as part of the supplementary consultation. We note that the policy under this heading requires the phasing and co-ordination to be in step with parameter plans for the new community. We assume that these are distinct from the masterplan referred to earlier in the policy wording. We are unclear as to what these are anticipated to cover and equally with which community developers are expected to agree these with. Or is it simply a typo and that it should read with the Council. Clarification needs to be provided as to the process and how this is managed so as to ensure all landowners/promoters have the ability to influence and shape such documents and that it should not be driven by a single party. Within the subsequent paragraph requirement the proposals to be in accordance with “an allocation-wide masterplan, Infrastructure Delivery Strategy (to accord with the Infrastructure Delivery Plan produced by the Council), Phasing Strategy and Financial Appraisal which will have been submitted to and approved by the local planning authority.” We note that this list does not include the previously mentioned

parameter plans and equally it is unclear as to how the Council anticipates that such documents will be prepared, by whom and how they will be approved. The information requirements of such documents is equally unknown and greater clarity is needed. It is equally the case that the level of detail required by the policy and compliance with the aforementioned documents is key to the likely success of any application(s). Whilst this is to be welcomed in terms of ensuring that one party does not decide to advance a conflicting application it is nonetheless important that sufficient structure is given to the requirements for these documents as the preparation is likely to take place over a reasonable timeline which needs to be factored into parties delivery trajectories. It is welcomed that there is an expectation that there is a degree of equalisation associated with the provision of infrastructure, however it is again unclear in how the Council intends this to work, noting that again there is not a mechanism yet defined as has been prepared in respect of the Cranbrook Expansion Areas. We have some concerns that if such mechanisms and approach are not agreed/clearly defined at an early juncture it may well make the subsequent application processes particularly difficult. We are supportive of the principles the Council are advancing, again there is at the current time a lack of detail which we believe should be addressed on an urgent basis so that further clarity is provided in advance of a submission for Examination. Though we consider it highly unlikely, unnecessary and of limited relevance to state within policy wording the ability or otherwise for compulsory purchase powers to be used. If planned appropriately with a well provided evidence base then such considerations will not be necessary. To conclude therefore we are supportive of the Council's strategy which identifies the need for a new settlement and we are supportive of the proposed land to be allocated with LVA controlling a significant proportion. We consider that whilst the current wording is helpful in progressing the Council's thinking in respect of the new settlement further clarity is needed on a wide range of matters and we are hopeful that the secondary consultation will shed some light on many of the issues raised. We look forward to working with the Council to progress this allocation and we confirm our commitment to working positively and proactively with other stakeholders associated with the new community.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

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: James McMurdo

Organisation (where relevant): McMurdo Land Planning and Development Ltd

Other party name (if relevant): Stuart Partners Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: We endorse Turleys views on this as detailed in its representations made on behalf of our client and Bloor Homes (Exeter), in partnership (but please note what we say on Hill Barton above). “Strategic Policy WS01: Development of a second new community east of Exeter [Support/Comments/Object]

2.14 Proposals to identify, allocate and develop a second new community within East Devon, as proposed by the plan and specifically Policy WS01, are strongly supported. As stated elsewhere and previously, there is very strong evidence to support the merits of providing for strategic scale development in the relatively unconstrained and strategically well located ‘West End’ of East Devon, to the East of the City of Exeter, and in close proximity to other regionally significant infrastructure and areas for growth. Making this provision within the plan represents a very positive and pro-active approach by the Council as the new community will be a long-term strategic development, which will need to be delivered over multiple plan periods. Notwithstanding this there is a need for a clear focus on how and when development will be brought forward and the mechanisms and approach to allow for this, given that it is essential for housing, employment land (and supporting infrastructure and other uses) to be realised (as expected by the Council) during the plan period to 2042.

2.15 It is understood that the Council are progressing further master planning for the new community together with associated work on phasing, infrastructure provision, viability, and delivery, with additional detail and further evidence to be part of a future further consultation later in 2025. In respect of many of these aspects and Policy WS01 overall, this further detail and evidence will be fundamental and so Bloor Homes and Stuart Partners look further to contributing to the ongoing preparation of this further

detail and evidence. At this stage we have commented on what are considered to be key aspects of Policy WS01 (as drafted) in the expectation that this policy will be further developed and refined for the further consultation to take place. Masterplan and Phasing

2.16 Policy WS01 states that “Development will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis.” We are aware that the Council is progressing work on a masterplan for the new community development (via a consultant team led by CBRE) and we have attended workshops held as part of this work and provided feedback as part of these sessions and the other consultation opportunities that have been provided. It is expected that this masterplan will provide important evidence to support the allocation being made in the plan and so it is important that it is progressed and made available as part of the further/future consultation to take place.

2.17 As drafted the plan does not help to specify or clarify the intended status of this masterplan, and how it will (or may) be used to provide the “whole new community masterplan” required by Policy WS01. Clarity around this point is essential as it feeds into many other aspects of the policy, including phasing and infrastructure delivery, and assumptions for delivery of homes during the plan period (with completions taking place from 2029).

2.18 Clarity on this masterplan and the alignment with the allocation area (boundary) being proposed by the plan is also important to ensure clarity around the quantum of development being allowed for in the plan period (and beyond) and interface with other policies (such as Policy WS09 relating to the Clyst Valley Regional Park and its proposed extension).

2.19 Alongside the masterplan, and on the same basis – how and when the required allocation wide Phasing Strategy will be available is fundamental for the clarity, effectiveness, and success of the policy. If the policy intends for an allocation wide Phasing Strategy to be prepared and approved, as part of Policy WS01, or (alternatively) by the Council subsequently, then this should be very clearly set out. This would confirm and clarify where and when the Council expects delivery to take place from the new community development (both homes, new employment land and other uses), given the context of the allocation providing for a substantial quantum of land, but with only part of this expected to come forward during the plan period. We would expect the Phasing Strategy and the plan to provide additional clarity about where and when in the wider allocation area, the Council expects early delivery to occur, with obvious options for this being on land controlled by Bloor Homes to the South of the A30, and around Hill Barton Business Park to the South of the allocation, adjacent to the A3052.

2.20 We look forward to further clarity on this element being provided as part of any refinement to Policy WS01 in due course and the additional evidence to be published to support this policy. Infrastructure Delivery Strategy

2.21 Linked to the masterplan and phasing matters discussed above the requirement of the Policy for an (allocation wide) Infrastructure Delivery Strategy requires further clarification in respect of when and how this will be devised and published and how it has informed the final iteration of the new community policy, and how it will inform the planning applications that will be required early in the plan period in order to meet the proposed development trajectory (completions from 2029). The detail of the Council's Infrastructure Delivery Plan and the Infrastructure Delivery Strategy specifically for the new community are core elements of this policy and require further clarity in terms of the timing and detail to be provided, and how this has informed viability assessment (including in respect of the final affordable housing policy to be set by Policy HN02).
Delivery Model

2.22 At previous stages of the plan and as part of the ongoing preparation of the supporting evidence, it is understood that the Council has been considering the most appropriate future delivery model for the new community and how development is to be effectively delivered to meet the requirements set by the plan.

2.23 As drafted Policy WS01 does not specify anything other than a traditional model of delivery for the new community development, and this would be strongly supported as the most effective and appropriate way for this new community to take place.

2.24 There are a number of key parties (and owners) involved in the promotion of the new community development, and there will be (via the provisions suggested as part of the emerging policy) appropriate mechanisms for collaboration and co-ordination, without the need for the creation (for example) of a New Town Development Corporation, where such provision is highly unlikely to be able to make provision for development in the timescales anticipated by the plan (and required to meet the urgent need for new housing and other development in the plan area). Collaboration and co-ordination are already taking place between the main promoters/developers/owners within the allocation area with work having been jointly commissioned to look in further detail at the engineering associated with the main roads and routes through the proposed allocation area. This work is due to be shared with the Council at future meetings and we expect will be useful in order to help develop the detail and evidence required to robustly support the component parts of the allocation.

2.25 It is noted that the Council (or other government or public sector bodies) may consider the use of compulsory purchase powers in order to progress delivery of infrastructure. Whilst the option may need to be kept open for the Council, it is not considered that this will be necessary for most (or all) of the new community

development, where a traditional model of delivery can be effectively used (guided by the documents suggested in Policy WS01) and where there may be potential for land to be made available to the Council (or other bodies) in order that the Council (or other bodies) take control over the delivery of parts of the scheme, such as schools, other community infrastructure, or the town/district centres as a whole. Further detail and evidence around these elements should be provided as part of the ongoing work on the masterplan, phasing, and infrastructure delivery plans for the new community and the next iteration of the policy and supporting evidence base. Development Quantum's and Density

2.26 Linked to above issues and detail around masterplan and phasing plans, is a requirement for additional clarity on the quantum of land needed and to be provided for housing, employment, town centres, BNG and SANG, all of which are essential for the overall soundness of the allocation policy and for clarity around the timing and location for delivery in the plan period. These issues will (as has already been discussed with the Council and their consultant team) overlap with other policies, such as the proposed Policy PB05 requirement for a minimum of 20% BNG, where this has the potential to significant impact on the quantum of green infrastructure land required within and for the scheme and so the associated quantum of built development that is likely to be achieved.

2.27 Density for the new community development is being set at an average of 45dph. As part of the further detail and evidence for the new community policy to be progressed this needs further review in line with the masterplan and viability work , to ensure that an appropriate average is being set, as part of range of densities that will be required to reflect the typologies expected in the market for this location and as part of a new community within Devon. Whilst some higher densities, including apartment typologies will be possible in and around centres (at or around the 55-60 dph suggested in the draft policy, predominantly this development will comprise prevailing context and market for development in this location. An average density that is less than 45dph may be most appropriate and this requires further critical review and part of the further detail and evidence that the Council is preparing. Gypsy and Traveller Provision

2.28 Policy WS01 proposes that the new community development should make provision for gypsy and traveller pitches both during the plan period and beyond, and that this provision is to be brought forward in line with “bricks and motor” housing development and integrated within the new community. The specific evidence to support the inclusion of pitches as part of the new community development (rather than any other locations, including on land controlled by the Council or the County Council) should be provided in order to support this proposed requirement, together with evidence to support why/how this provision would be successful as part of the new community, rather than in other specific locations that could be identified by the

Council. At this stage there is not evidence to support the inclusion of pitches as part of the new community and so there is an objection to this element of the policy, which requires further consideration and amendment. Stewardship

2.29 Policy WS01 as drafted requires that a robust and sustainable stewardship vehicle and governance is put in place early in the planning and delivery process. This is to be informed by a Stewardship Strategy (to form part of the allocation wide masterplan). It is not clear from the policy what type or form of stewardship this element of the policy is intended to support, either via a new public authority (such as a new Town Council) for the new community (in place of, or via the reorganisation of existing Parish Council's for the new community area), or more traditional arrangements for oversight via the District and County Councils, with the use of Management Companies for the ongoing management and maintenance of some communal areas and assets. The policy should be more specific about expectations around this aspect of Waste Transfer Station and Waste Water Treatment Works

2.30 Further evidence is required to support the inclusion of these two elements within and as part of the new community given that it is likely that they will likely support development beyond the new community. Evidence provided to support any updated version of Policy WS01 should include justification for the inclusion of these elements and their spatial requirements. If evidence shows that they are required within and as part of the new community, then they should be accounted for as part of the masterplan, phasing, and delivery plans (including viability assessment) and optimum locations considered having regard to form and function as well as possible environmental impacts and issues. It is likely that there would be (subject to detailed design and other constraints assessment) locations in the southern part of the new community near to the existing industrial uses at Hill Barton Business Park that would/could be suitable for these uses as part of the comprehensive development contemplated for the new community. This provision needs further clarification as part of the additional detail and evidence required for Policy WS01.”

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: We are concerned that there remains an over reliance on the role of the new community in the Plan period and that this further undermines the Plan's assumptions in respect of housing delivery and providing sufficient sites to meet local needs. The lessons of Cranbrook and the long lead in times in establishing land assembly and infrastructure planning do not appear to have been taken into account.

Whilst not objecting to the principle of the new community we do consider the Council are premature at this stage to rely on an assumption of 3,300 new homes being delivered within the Plan period by 2042. This is because beyond broad technical feasibility and a vision there is still a significant absence of detail as to how the new settlement will come forward and what is actually proposed.

Again, this reliance places additional pressures on the effectiveness of the Plan in the second half of the Plan period if, as expected, the suggested level of housing coming forward on the site is significantly behind the trajectory.

It emphasises the point that the Council must ensure resilience to the Plan by enabling the early release of other site allocations, facilitating phasing where appropriate to support delivery in the earlier stages of the Plan. Whilst it is correct that the new community will have an important role in the future, it is not there yet in terms of certainty of detail and should not be used to underpin this Plan's strategy. Instead, this

Plan's strategy should be based on a range of sites that includes maximising opportunities early in the Plan period and the delivery of sites, (phased appropriately) less burdened by constraints and infrastructure capacity issues.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 important that the housing delivery rate assumed from the new community (Policy WS01) within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it is seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision from the new community and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: We are concerned that there remains an over reliance on the role of the new community in the Plan period and that this further undermines the Plan's assumptions in respect of housing delivery and providing sufficient sites to meet local needs. The lessons of Cranbrook and the long lead in times in establishing land assembly and infrastructure planning do not appear to have been taken into account.

Whilst not objecting to the principle of the new community we do consider the Council are premature at this stage to rely on an assumption of 3,300 new homes being delivered within the Plan period by 2042. This is because beyond broad technical feasibility and a vision there is still a significant absence of detail as to how the new settlement will come forward and what is actually proposed.

Given this we have previously suggested the Plan should treat it as little more than a direction of travel, with only minimal reliance on it in terms of housing delivery within the Plan period. There seems no further evidence to suggest that proposals have tangibly progressed and certainly not to underpin the level of delivery now being suggested. Again, this reliance places additional pressures on the effectiveness of the Plan in the second half of the Plan period if, as expected, the suggested level of housing coming forward on the site is significantly behind the trajectory.

It emphasises the points we have raised above in respect of spatial strategy and how the plan deals with housing delivery generally, in that over assumption of delivery across a narrower range of complex sites can only result in under supply and not meeting need. Whilst it is correct that the new community will have an important role in the future, it is not there yet in terms of certainty of detail and should not be used to underpin this Plan's strategy. Instead, this Plan's strategy should be based on a range of sites that includes maximising opportunities early in the Plan period and the delivery of sites less burdened by constraints and infrastructure capacity issues.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: MODIFICATIONS REQUIRED

It is important that the housing delivery rate assumed from the new community within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it is seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision from the new community and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: [Submitted on behalf of Waddeton Park Limited (Honiton)]

We are concerned that there remains an over reliance on the role of the new community in the Plan period and that this further undermines the Plan's assumptions in respect of housing delivery and providing sufficient sites to meet local needs. The lessons of Cranbrook and the long lead in times in establishing land assembly and infrastructure planning do not appear to have been taken into account.

Whilst not objecting to the principle of the new community we do consider the Council are premature at this stage to rely on an assumption of 3,300 new homes being delivered within the Plan period by 2042. This is because beyond broad technical feasibility and a vision there is still a significant absence of detail as to how the new settlement will come forward and what is actually proposed.

Given this we have previously suggested the Plan should treat it as little more than a direction of travel, with only minimal reliance on it in terms of housing delivery within the Plan period. There seems no further evidence to suggest that proposals have tangibly progressed and certainly not to underpin the level of delivery now being

suggested. Again, this reliance places additional pressures on the effectiveness of the Plan in the second half of the Plan period if, as expected, the suggested level of housing coming forward on the site is significantly behind the trajectory.

It emphasises the points we have raised above in respect of spatial strategy and how the plan deals with housing delivery generally, in that over assumption of delivery across a narrower range of complex sites can only result in under supply and not meeting need. Whilst it is correct that the new community will have an important role in the future, it is not there yet in terms of certainty of detail and should not be used to underpin this Plan's strategy. Instead, this Plan's strategy should be based on a range of sites that includes maximising opportunities early in the Plan period and the delivery of sites less burdened by constraints and infrastructure capacity issues.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 important that the housing delivery rate assumed from the new community within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision from the new community and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

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.: To elaborate on these and earlier representations made to the Plan

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: (PCL Planning on Behalf of Waddeton Park Limited (Honiton)): We are concerned that there remains an over reliance on the role of the new community in the Plan period and that this further undermines the Plan's assumptions in respect of housing delivery and providing sufficient sites to meet local needs. The lessons of Cranbrook and the long lead in times in establishing land assembly and infrastructure planning do not appear to have been taken into account. Whilst not objecting to the principle of the new community we do consider the Council are premature at this stage to rely on an assumption of 3,300 new homes being delivered within the Plan period by 2042. This is because beyond broad technical feasibility and a vision there is still a significant absence of detail as to how the new settlement will come forward and what is actually proposed. Given this we have previously suggested the Plan should treat it as little more than a direction of travel, with only minimal reliance on it in terms of housing delivery within the Plan period. There seems no further evidence to suggest that proposals have tangibly progressed and certainly not to underpin the level of delivery now being suggested. Again, this reliance places additional pressures on the effectiveness of the Plan in the second half of the Plan period if, as expected, the suggested level of housing coming forward on the site is significantly behind the trajectory. It emphasises the points we have raised above in respect of spatial strategy and how the plan deals with housing delivery generally, in that over assumption of delivery across a narrower range of complex sites can only result in under supply and not meeting need. Whilst it is correct that the new community will have an important role in the future, it is not there yet in terms of certainty of detail and should not be used to underpin this Plan's strategy. Instead, this Plan's strategy should be based on a range of sites that includes

maximising opportunities early in the Plan period and the delivery of sites less burdened by constraints and infrastructure capacity issues.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 important that the housing delivery rate assumed from the new community within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision from the new community and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

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.: in order to provide greater elaboration of the detail of these representations

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Chapter 4 – Development at the West End

Strategic Policy WS01: Development of a second new community east of Exeter

We are concerned that there remains an over reliance on the role of the new community in the Plan period and that this further undermines the Plan's assumptions in respect of housing delivery and providing sufficient sites to meet local needs. The lessons of Cranbrook and the long lead in times in establishing land assembly and infrastructure planning do not appear to have been taken into account.

Whilst not objecting to the principle of the new community we do consider the Council are premature at this stage to rely on an assumption of 3,300 new homes being delivered within the Plan period by 2042. This is because beyond broad technical feasibility and a vision there is still a significant absence of detail as to how the new settlement will come forward and what is actually proposed.

Given this we have previously suggested the Plan should treat it as little more than a direction of travel, with only minimal reliance on it in terms of housing delivery within the Plan period. There seems no further evidence to suggest that proposals have tangibly progressed and certainly not to underpin the level of delivery now being

suggested. Again, this reliance places additional pressures on the effectiveness of the Plan in the second half of the Plan period if, as expected, the suggested level of housing coming forward on the site is significantly behind the trajectory.

It emphasises the points we have raised above in respect of spatial strategy and how the plan deals with housing delivery generally, in that over assumption of delivery across a narrower range of complex sites can only result in under supply and not meeting need. Whilst it is correct that the new community will have an important role in the future, it is not there yet in terms of certainty of detail and should not be used to underpin this Plan's strategy. Instead, this Plan's strategy should be based on a range of sites that includes maximising opportunities early in the Plan period and the delivery of sites less burdened by constraints and infrastructure capacity issues.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Modification required

It is important that the housing delivery rate assumed from the new community within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision from the new community and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

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.: To elaborate on these representations and previous representations made on the Plan

Full name: Will Ridalls

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Simon Stokes

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: We are concerned that there remains an over reliance on the role of the new community in the Plan period and that this further undermines the Plan's assumptions in respect of housing delivery and providing sufficient sites to meet local needs. The lessons of Cranbrook and the long lead in times in establishing land assembly and infrastructure planning do not appear to have been taken into account. Whilst not objecting to the principle of the new community we do consider the Council are premature at this stage to rely on an assumption of 3,300 new homes being delivered within the Plan period by 2042. This is because beyond broad technical feasibility and a vision there is still a significant absence of detail as to how the new settlement will come forward and what is actually proposed. Again, this reliance places additional pressures on the effectiveness of the Plan in the second half of the Plan period if, as expected, the suggested level of housing coming forward on the site is significantly behind the trajectory. 5 Also at: 9 Western Road, Launceston, Cornwall, PL15 7AR t: +44 (0)1566 977000 The Keep, Creech Castle, Taunton, TA1 2DX t: +44 (0)1823 577998 Registered Office: 1A Parliament Square, Parliament Street, Crediton, Devon, EX17 2AW Registered in England and Wales No. 8300933 VAT No. 923955793 It emphasises the points we have raised above in respect of spatial strategy and how the plan deals with housing delivery generally, in that over assumption of delivery across a narrower range of complex sites can only result in under supply and not meeting need. Whilst it is correct that the new community will have an important role in the future, it is not there yet in terms of certainty of detail and should not be used to underpin this Plan's strategy. Instead, this Plan's strategy should be based on a range of sites that includes maximising opportunities early in the Plan period and the delivery of sites less burdened by constraints and infrastructure capacity issues.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 important that the housing delivery rate assumed from the new community within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it is seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision from the new community and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

Full name: Robert Barnes

Organisation (where relevant): Planning Prospects Ltd

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

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: EDAL support growth and development at the West End and acknowledge the potential of the second new community proposed here. The requirements in the draft Policy around masterplanning and phasing, and coordination with the provision of supporting infrastructure, will be particularly important and must be rigorously enforced.

However, it should also be acknowledged that this would be a substantial new community in close proximity to an Airport where noise and safeguarding issues can be a constraint. To support the delivery of the allocation without encountering difficulties later in the process that could otherwise have been avoided the Policy should make specific reference to the Airport and the need for early engagement and consultation in the preparation of the required masterplan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 in the Policy to the proximity of the Airport, and the need for the masterplan to proceed at every stage informed by consultation with the Airport.

4. Do you consider that this part of the Development at the West End 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.

Full name: Paul Bergin

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: 4) Protect Farringdon a) this new town effectively swallows up 50% of what is Farringdon Parish today b) what will remain of Farringdon should be protected - a significant open space (of grass, trees, water and not simply some narrow strip) between where the new town ends and what remains of Farringdon is essential

Full name: Paul Bergin

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: 1) New town Decision Process a) this is a new town, eventually comprising 10,000 dwellings (not a “small development”) b) the location is driven purely by “call for sites” results c) when asked to visit Farringdon to view the New Town proposed location, the SPC declined d) this New Town is located right next to partly completed Cranbrook, another New Town project e) the developers describe it as an “Exeter extension” and these two new towns combined massively increase the size of Exeter - by circa 40%

Should the location of a New Town be driven primarily by a call for sites? This project is so significant, should decisions be taken at a higher (regional / national vs local) level? No appropriate infrastructure is in place (or currently planned) to cope / there is no railway line or likelihood of one.

Full name: Kate Bergin

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As a Farringdon resident myself, I am aghast at the total lack of long term vision of this project and the apparent disregard for our existing and thriving community. Nobody has come to visit us or allow us to voice our concerns. I hope my comments will be given due consideration and not fall on deaf ears.

Full name: Jerry Bird

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Firstly, this is a hugely in-depth and crucial consultation for our district, particularly for those of us at the West End, the future depository for practically all building development, but even appreciating that fact, the Commonplace approach is not user friendly, it's too 'clunky' and the sheer scale of included information is quite overwhelming. Even for those of us with a modicum of IT skills and common sense, navigating around the various documents and expecting the General Public to have Planning Officers' knowledge in order to cite justification for or against policies etc, and by which legislation it's being supported or objected to is frankly ludicrous! The New Community / Infrastructure / Sustainability Although the consultation has lasted six weeks, I think it would take that time, full time that is, without day jobs and other life commitments, to come close to understanding fully every strand of policy, legislation and requirement to complete the Commonplace questions with any conviction that 'input' was factual and / or correct. No wonder, considering the population of East Devon, only a small percentage of people bother, which suggests that by design it aids the process by keeping numbers low, manageable and the process for pushing things through easier. There is already a perceived lack of trust in the use of the Commonplace portal and how the information is used to produce credible results. Also, it was noted that despite the consultation being open until 31st March, the online portal had closed by 1000, not 1700 or even 23.59 hours which still encompasses the 31st March. Although, like the majority of locals in the affected Parish of Farringdon, I am totally against the crass scale of proposed development being planned for our small rural community, it is vitally important that EDDC engages directly, and sensibly, i.e. regular face to face engagement, with the community to help drive forward a plan that will safeguard the existing dwellings and welfare of those affected. The whole process of how the site was selected / ratified and the SPC's refusal to actually visit the site to see for themselves the environment which would be destroyed was particularly disappointing, even when invited towards the latter stages. We do not wish to experience that kind of sidelining / dismissive attitude again, particularly when the majority of the SPC Councillors have no connection to the West End of the District, therefore it being of no consequence to them / their Wards.

Appropriate thought must be given to what the new community will be called, with the sympathetic engagement of local opinion. The name Denbow has been bandied around, but this is not appropriate. Allow the people of Farringdon, Clyst Honiton and Clyst St Mary have the input, not outsiders, and certainly not developers.

By its own Ward Councillor's estimation, Cranbrook is approximately 15 to 20 years away from being finished, and everyone is too well aware of the mistakes and issues associated with its development. They continue, primarily as the various developers are in the driving seat and dictate what they wish to build and when, particularly when it comes to affordable housing. 13 years on and the so-called Town Centre is still under development. Despite all of this, a second new development will commence development. The West End building site will be in continuous operation for a number of decades to come. What a nightmare for locals to endure, a blight on our environment.

It is essential that before the first houses are built, all required and proper infrastructure must be in place first, learning from the flawed Cranbrook model. That includes all water / sewage, power, access connections and an indication that appropriate medical, dental, educational facilities are included as a must. Whilst they cannot be forced, there are seemingly no incentives to encourage the NHS to provide surgeries / clinics or dental practices etc within such a development, but by the same token no help is given to the existing facilities to cope with unprecedented demand from Tithebarn and Cranbrook, a recent open letter from the Pinhoe and Broadclyst Surgery raising this very issue. It's unacceptable to further burden the extremely overstretched existing facilities, hence again reiterating the point that whoever ultimately drives this development has the responsibility to ensure infrastructure requirements are met, prioritising local needs and not developers' greed.

South West Water have proven to be particularly inept at managing their current level of infrastructure and have caused numerous pollution issues as a result. What safeguards are in place to ensure that water and sewage facilities will cope and be managed correctly for the size of the proposed development without impacting adversely (siting, odours vehicular movements etc) on the existing community? Likewise with DCC Highways, totally unable to manage and maintain even a small percentage of its existing road network, lacking in appropriate budget, yet in time additional access roads will be constructed for the new community, and over time an additional 20,000 extra vehicles added to the road network which is at breaking point now, specifically the A30 towards Sowton and the A3052 towards Sandygate. There is no planned rail link, public transport

will be problematic and cycle routes will primarily be for fair weather use, the latter two currently being experienced by Cranbrook, as cited by its Ward Councillor.

Sufficient and non-negotiable levels of affordable housing must be included. If 20 or 30 % is the required amount, then that's what must be delivered, without later developer reductions because their profit margins are affected. That is not an acceptable argument! Affordable houses must be available for locals first, resident local families who would wish and expect to continue to live and work within their home area / community, and not be forced away due to inflated house prices akin to those of South East England etc. Bulk buying of properties by other 'outside' authorities to rehouse and rehome residents from their areas must not be permitted. Otherwise, a false migration is created, with locals being forced away to buy and residents from other areas being moved in. Where is the sense in that!!??

So, despite the wider populace knowing otherwise, will this new community be guaranteed to be sustainable as envisaged by EDDC? Will it just become a dormitory town for Exeter, something which was again acknowledged as a possibility by EDDC's Assistant Director of Planning? It appears, despite the glossy brochures, EDDC is planning for one thing, but the reality, much like Cranbrook, could be very different.

Environment

Nothing has been really done to safeguard agricultural activities, and the proposed new community will see the loss of at least 500 hectares of good agricultural land, and its environment, flora and fauna etc. Potentially it does not stop at 'just 500 hectares', especially if future expansion is required towards Woodbury and Clyst St George as indicated by EDDC's own Assistant Planning Director when pressed at previous SPC Meetings. At a time when food costs are escalating, farmers are being squeezed and arable land continues to be lost to overbearing mass development, our agricultural land must be protected. Sufficient land availability must still be considered for appropriate levels of food production. Farming is one of the primary industries within Devon as a whole, Devon being a rural County, a green County, but it is being continuously squeezed out.

With regard to the new community, the distribution of green areas within the proposed area must include proper buffer space, at least 100 metres, between / around existing

dwelling and any proposed new building, whether it's infrastructure or domestically related. Existing boundaries of dwellings must be safeguarded and recognised, i.e. trees, hedges etc not 'accidentally' removed by developers because it affects their plan. The unwanted encroachment towards, against the existing Farringdon is causing a great deal of anger and anxiety amongst residents, particularly where Water Treatment, Cemetery and Solar facilities are possibly being located. In respect of the latter, rather than waste land by covering it with unsightly solar panels, why not ensure / mandate that each building must have solar panels on its roof? If you're pushing to be eco / environmentally friendly then would that not be a sensible requirement? Leave designated Solar Farm land as simply green, plant trees and or wildflower meadows instead. Had proper consideration been given to the siting of large solar farms so close to Exeter Airport, a potential safeguarding issue re. Aviation safety, e.g. large areas of reflective surfaces close to the Airport and within its local traffic pattern?

A cap on any further industrial development must be included. Hill Barton and the smaller Waldrons Estates already exist. No further expansion of their existing footprints is necessary. No additional industrial estates are required, especially with the multitude already within the West End of the District, and further areas being earmarked for such development i.e. near the Airport etc.

Future Oversight

The planned devolution and EDDC ceasing to exist in three years time, is a concern with respect to the validity of The Local Plan thereafter. It had been hoped that EDDC would see this through, but under devolution it'll come under a Unitary Authority. Will that Authority have the same power, influence or will it just be token input allowing developers to do as they please with Central Government's backing? Whilst appreciating any new Authority must initially adopt The Plan, I understand that it can be reviewed at the five year stage and essentially changed to suit future housing requirements, which potentially means even more mass development. What safeguards are in place to ensure that the Plan will be future proof and will be maintained for its full term at least?

Full name: Richard Cord

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Whilst we respect the development needs to expand into the future we object to the proximity of the suggested development so close and adjacent to our property

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 have attached the relevant local plan and it is proposed that “New settlement – Option 2 Alternative choice” be implemented.

With so much vacant land in the area to be used first, utilizing this land adjacent to our property in close proximity would be wrong and detrimental to the sustainability and wellness of the existing properties.

Full name: Dawn Cowler

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I am writing to you with great concern regarding the proposed new settlement covering land at Farringdon, East Devon. The village of Farringdon is a lovely rural place to live at present, but the threat of a new town has caused great concern to its residents who have chosen to live here so that they can enjoy its peace and tranquillity. A new town, swallowing up the countryside and its rich wildlife, would have a devastating impact on the village, and would change it forever. I realise that the government is pushing District Councils to build houses, but surely using any brown field sites should be their first priority, rather than destroying prime agricultural land that has served its people for thousands of years. Denbow is in fact mentioned in the Domesday Book, and is threatened by having a proposed new town built around it. This beautiful property, as well as other listed houses within the village, should be protected, not ruined. It just doesn't make sense! I am pleading with you to do all you can in your power to prevent this proposal going ahead. Only recently we read that it looks as though the population is likely to reduce drastically in the coming years. I have lived here all my life, as have generations of my family before me, and cannot bear this beautiful area to be destroyed. Yours Sincerely

Full name: David Cowler

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As a resident of Farringdon I am extremely disappointed at the way the new town has been pushed through despite objections from local residents at the previous two consultations. This area was chosen because of a local landowner buying up the land then making it available to the council. I understand committee members did not make themselves available to even inspect the area. Because we are only a small parish we have been totally ignored. The area involved is unspoilt rolling farmland with the wildlife that goes with it. The draft local plan itself seems ok if the town was to go ahead but that is not the point.

Full name: Richard John Eley

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: My

view is that this 'West End' Chapter is excruciatingly written and fundamentally dishonest. We know (not least from our experience with Cranbrook) that the development will not be of high quality and will not be undertaken by local developers. Design is very unlikely to be of a high standard: the house will be small, have tiny rooms, tiny windows and tiny gardens. There is likely to be inadequate community services, and little open space. 'Active travel' is a flagrant euphemism for 'wholly inadequate transport provision'. It is extremely unlikely that the development will have any local characteristics, and it will doubtless be indistinguishable from countless others of similar ilk found all over England.

This chapter is therefore especially disingenuous and simply dishonest. This is why the presentation style is close to nauseating and beyond parody.

It is wretchedly, profoundly and unpleasantly dishonest.

I hope this means it is not legally compliant.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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 would urge the description of the planned new community to be entirely rewritten in a much more accurate and less

deceitful way. We should make it clear that this will be mass housing, that services will be limited, and that we are effectively creating another new suburb for Exeter.

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I see no purpose in the chapter describing a development in such a meaningless and frankly ridiculous way. Surely, something so false cannot be 'sound'.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 respectfully suggest that a simple, accurate, realistic and fact-based description of the New Community is required.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I do not think that the creation of a Greater Exeter has been properly debated, and the suitability of the location has not been fully explored. I particularly feel that the ludicrous over-optimistic presentation is wholly inappropriate.

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 think we should consider whether the West End should be properly defined. I think we should discuss whether the scale of development in the West End is advisable (I think housing could be potentially provided elsewhere in East Devon. I think we should consider whether economic development could be encouraged elsewhere in East Devon, especially tourism. And I think we need to closely examine infrastructure requirements, especially roads. Although our draft Local Plan talks lengthily about dealing with climate change, and health and wellbeing, it is notably lacking in any details as to how this is going to be achieved.

I would also like to see economic development being married to specific proposals to improve our clearly struggling town centres, as opposed to concentrating all economic activity in Exeter.

Full name: Suzanne Hales

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I am writing this as a resident , I have been Chairwoman of Clyst Honiton Parish Council for nine years. These are my comments about the latest EDDC local plan. I live in Clyst Honiton and would like to voice concern about the site decided for another new town. We are not opposed to a new town but the area is not the right one , land the other side near Greendale and Woodbury is a better option, but would still need better road planning. The topography of the site that had been chosen is ridiculous , its hilly ,wet and the roads around it are narrow and always snarled up. At no point have Clyst Honiton been asked or consulted about the new town-IT IS IN OUR PARISH! Not once have EDDC or any councillors attended a Parish council meeting. It's like we don't exist. We could help. Clyst Honiton has been dumped on so many times. We've had skypark, science, Park Lidl, Amazon, DPD , land taken by Cranbrook and Skypark, a giant phone mast stuck at the bottom of our village, and to add insult to injury jury a warehouse was granted permission by government to be built in the village! We tried to plan an NDO for our village to provide housing for our village and a community building , we have had thousands of pounds in grants. we are met with constant obstacles from Highways, Exeter airport and other bodies. Highways allow access for developers onto the old A30 but not access onto the Clyst Honiton bypass for our site.

The consultation for the new town at Westpoint has not been useful to residents. We have local knowledge of the proposed area for the new town. Comments included, No clear route to join the town to facilities, The map shown did not show all the hills and streams that would need to be travelled . For a so called sustainable town access around it was poor. No new roads were shown, The bus route seemed to stop halfway though the town. Residents would have to go miles around the town to get to the other side of it. My other concern is that the plan seems rushed and not thought through properly.

Full name: Suzanne Hales

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

The new community has not been consulted on properly. The topography of the site is wrong its hilly, wet, and has not been thought through properly.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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.: It should say a new community is being considered but the area has not been decided. The plan is not robust no local knowledge has been used from the consultation

3. Do you consider that this part of the Development at the West End chapter is sound?: No

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Communities and Parishes have not been included in decisions on placement of new town

Full name: Karime Hassan MBE

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End 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] Policy WS01 states the Council will produce an infrastructure delivery plan that will set out requirements. The text explains the emerging thinking regarding the approach to the allocation wide delivery strategy, and the possibility of a stewardship strategy and governance structure for delivery. These are all relevant and vital issues that inform the credibility of a delivery strategy and to ensure the aims of the strategic policy can be delivered and the outcomes realised. The thoughtful approach that is being taken to the policy framework, set out in the Emerging Plan, reflects learning from the first new community at Cranbrook. This approach is supported and requires further more detailed examination to ensure that the appropriate policy support is maintained and does not get diluted in order to address other planning objectives.

The Policy aims to provide a full range of social, cultural, sport, leisure, health, community and education facilities to support the provision of housing and employment, along with open spaces and facilities, and at least 254 hectares of land for green [and blue] infrastructure provision (including approximately 150Ha of Suitable Alternative Natural Greenspace (SANG) to meet Habitat Regulations requirements. The land budget requirements to meet the expectations of the new community, providing a sustainable community with a good degree of self-containment and delivering wellbeing, active lifestyles, active travel and other objectives will be challenging. Viability of housing development may be challenged if the investment in early infrastructure is required ahead of the housing sales and in the absence of a delivery mechanism, experience across the country shows that commercial town centre type uses and a range of social and community infrastructure can lag behind house building. This has an adverse impact on developing social networks and a sense of self-containment. Learning lessons from Cranbrook has informed the Council's emerging policy approach, it seeks the prioritisation of educational infrastructure and that is

supported as an approach. The area to the south of the southern boundary of the proposed second new community has an existing leisure asset base that would provide early opportunities to build social networks and connections with existing green infrastructure and organised sporting and leisure facilities. This is an opportunity that could be encouraged and incorporated into the master planning considerations that will follow. Exeter Athletic Rugby Club is located at Oil Mill Land near the A3052, ERG own the freehold of the Oil Mill playing facilities, nearby is the Exeter City Football Club facilities at the Cat and Fiddle and other leisure facilities are within easy access to the new community. There is an opportunity to provide a strategic provision for formal playing facilities using and expanding on the existing asset base that can give an accelerated provision of facilities for the new and developing new community. ERG would be keen to explore the opportunities to develop the approach to the master planning that addresses the strategic ambition and the shared objectives in developing the wellbeing, sporting and leisure offer of the new community. ERG has invested heavily in supporting the development of women's rugby and developing community programmes and more formal pathways through the academy system with Exeter College and the University of Exeter. Providing a strong sporting and leisure offer in close proximity to the large-scale housing provision could strengthen self-containment and identity for the new community and also support cross boundary joint working to address transport, wellbeing and strategic green infrastructure objectives. ERG would wish to be engaged with the Council exploring such opportunities ahead of the Council formalising master plans.

Full name: Karime Hassan MBE

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Social and community infrastructure under Strategic Policy WS01 I wish to raise a very focused observation on one aspect of social and community infrastructure that arises as a consequence of the changes that are taking place as the Exeter and Devon economy changes and the social needs of the area change. There has been a long- term challenge of supplying enough labour to meet the needs of local employers. This can be evidenced by vacancy rates/ historical data on the number of jobs advertised, and the observations from local chambers of commerce. Shortage of Labour and skills are consistently cited as constraints, this can be very challenging for specific sectors such as the care sector and construction. As a consequence of labour demand the character of the population is changing and a more diverse population is growing up. The social and community infrastructure required to support the second new community ought to reflect the needs of this changing population which will be more diverse, younger and more economically active than the rest of the district. The technical evidence and background reports on the role and function of settlements has done a good job in analysing the needs of communities and what is presently available. However, I would wish to bring to your attention a very specific need that is not presently recognised, namely, the needs of the growing Muslim population particularly in providing for future burial needs. Based on the 2021 census the actual number of people who identify as Muslim in Devon is low, the number for East Devon and Exeter being just over 3,000. But the population is growing, and will increase in the future. The Islamic Centre in Exeter serves as the cultural centre for the community of Devon, and arguably for the south west peninsula. The community already has a challenge with finding burial plots and the problem is becoming acute. Muslims are not allowed to cremate their dead. Presently there is no dedicated graveyard or burial section for Muslims in East Devon. Exeter has only a modest short-term provision of less than 40 plots. The community needs a provision to meet the inevitable requirements of burying our dead. Although one may assume based on burial capacity for graves in Sidmouth, Seaton and Sidbury

cemeteries the district may have availability at least in the short term for the generic population, that provision does not meet the specific needs of the Muslim community, nor are those facilities close to the community that is centred on Exeter and increasingly on the eastern edge of the city and in the west end of the district. With the planned second new community and the urban extensions around Exeter there is an essential case to assess the longer needs of the Muslim Community and to identify that need along with the other social and community infrastructure to be captured in the master plan and infrastructure requirements. The Islamic Centre for Exeter and the South West could provide more specific details, and I would be happy to present material and to explain the distinctive needs of the Muslim community.

Full name: Dan Lakeman

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: If the majority of the people in the district DO NOT want this to happen, how can it possibly be legally compliant? You are elected by us to represent us. None of this represents what the people of East Devon want - if you leave your offices once in a while, you'd realise that.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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.: Scrap it completely. Utterly wrong

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Scrap the whole development

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

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.: To get it scrapped

Full name: Martin Thurgood

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:
DEVELOPMENT AT THE WEST END Only large-scale development provides for high quality developments. The Cornish example of Nansledan shows what can be achieved towards Objectives 2, 6 and 9 through a comprehensive and carefully considered housing provision. East Devon District Council has the opportunity to demonstrate its abilities and commitments to truly delivering a world-beating vision through a major planned expansion through an enlarged proposed second new community, Policy SW01, rather than piecemeal relatively small-scale developments at the edges of existing communities. Development at the West End should be given priority, should be of such a scale that most other 'edge of communities' housing development is unnecessary, should be of class-beating standard (such as demonstrated by the Cornish Nansledan development) and should be commenced without delay.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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 response at Q 3(b) above.
(Should your form say 2(b)???)

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See earlier comments.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 earlier comments.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: I am neutral on the point: but you do not give me that option.

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)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: Please refer to the attached sheet.

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: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: We welcome the commitment to deliver a minimum of 254 hectares of land for green infrastructure provision as part of the new town. However, a greater level of detail is required within this policy to ensure that high quality nature-rich infrastructure is delivered.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: We would like to see reference to the creation of local natural habitats (not just 'green space') including a wide range of semi-natural habitats and features. These bring biodiversity, carbon, water-environment and wellbeing benefits and can be integrated to help define neighbourhoods. The Nature Recovery Network should be utilised to inform the creation of green infrastructure. Buildings should also incorporate homes for wildlife, and lighting must be carefully planned to be sensitive to wildlife and provide dark areas/corridors for nocturnal wildlife.

Full name: Helene Jessop

Organisation (where relevant): RSPB

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: There is as yet no strategy to deal with the increased emissions from increased vehicle numbers and usage (increased nitrogen damages heathland habitats). The nearest heathland habitats that are part of the East Devon Heaths SAC/SPA (including RSPB's Aylesbeare Common reserve) are less than 4km to the east and, even allowing for SANG and green infrastructure delivery and provision for active travel, impact of increased vehicle traffic arising from residents and businesses at this new development affecting the designated heaths is a risk. The RSPB is also concerned at the provision of SANG. The proposed new community is to be 10,000 dwellings; SANG should be provided at 8 ha per 1,000 residents. This policy proposes c150 ha of SANG, which should be sufficient for c18,750 residents. It is reasonable to expect that 10,000 dwellings will accommodate an average of more than 2 people per dwelling so that SANG provision is not adequate. The RSPB objects to the lack of sufficient SANG provision set out in this policy. The area of SANG needs to be increased to accommodate the total expected population of the new community. SANG provision must be adequate (in terms of size, location and attraction to new residents, including dog walkers and especially those who wish to walk their dogs off leads) and delivered in sufficient quantity in step with development phases so that new residents will choose to use the SANG for daily recreational needs (eg, twice daily dog walks) instead of accessing the nearby designated heathlands (or the Exe Estuary SPA shoreline).

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: This policy should make clear that

developments will not proceed until adequate safeguards are in place to avoid increased emissions that would otherwise damage the designated habitats, and how the recreational needs of the new residents will be met without damaging the SAC/SPA habitats or adversely impacting on their habitats. SANG must be provided in step with any new developments so it is fully functioning at occupation of new dwellings, the area of SANG is sufficient for the number of new residents and their needs, including walking of dogs off leads.

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.: The RSPB is concerned that major housing and other developments are being proposed in the Plan in the absence of a strategy to address impacts of nitrogen deposition on the SAC/SPA heathland habitats (this is essential as the critical threshold has already been reached). The RSPB is also concerned that the amount of SANG provision appears insufficient for the number of new residents arising from the proposed number of new dwellings.

Full name: Ed Moffatt

Organisation (where relevant): The Diocese of Exeter

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: In respect of Policy WS01 the Diocese of Exeter supports the provision of ‘a full range of social, cultural, sport, leisure, health, community and education facilities [...] to meet the needs of all age groups that will live at the new community.’ It also supports Policy CF01 on ‘New or extended community facilities’ and notes the reference in Para. 16.2 of the supporting text to places of worship being included within the list of facilities that fall within the definition. It takes these references to indicate an intention on the part of the Planning Authority to ‘plan positively for the provision and use of shared spaces, community facilities (such as [...] places of worship) and other local services’ (NPPF Para. 98). The Diocese of Exeter accordingly requests involvement in the development of the Infrastructure Delivery Plan for the new community and seeks to engage from as early an opportunity as possible as a stakeholder and partner organisation in the delivery of services. Our experience of participating and investing in the formation and shaping of Cranbrook stands us in good stead to play a similar role in the development of a further socially sustainable new community in East Devon. The Diocese (along with our ecumenical project partners) was one of the first third sector organisations to be active on the ground in Cranbrook, with a worker resident in the community almost from its inception, working with and alongside the first primary school to help establish a new community identity underpinned by networks of support. Our involvement has been sustained to the present day delivering not only our core / statutory services (services of Christian worship for those who wish to participate from within the community – currently growing towards 100 regular attendees – as well as baptisms, funerals and civic services such as on Remembrance Sunday), but also a whole range of activities and services for the community at large. These include parent and toddler provision

(Little Cranberries, providing weekly social contact and support for around 60 families / 90 children and family carers), substantial involvement in running St Martin's Primary School (including reading support, mentoring, pastoral support for staff, assemblies and lessons) and also a whole range of community wide events (such as free termly Family Fun days with an attendance of around 150 people, Christmas social events and participating in the Cranbrook Festival). Behind these activities lie the provision of free pastoral care and support to anyone in the community who wishes to access it, regardless of their own faith background, as is the case in every other town (and many villages) in Devon. It is this experience and expertise that the Diocese will seek to bring to the development of the new community as outlined in Policy WS01.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: Yes

Full name: Rosie

Organisation (where relevant): Woodland Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:
These site allocations contain or are adjacent to either Ancient Woodland or Ancient and Veteran trees and therefore do not comply with the NPPF on irreplaceable habitats.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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 remove this site allocations from the local plan so that they do not impact on ancient woodalnd or ancient and veteran tres

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: As above

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: 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: Karan Bennett

Organisation (where relevant): Bishops Clyst Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I would like to submit a representation to the consultation on the East Devon Local Plan on behalf of Bishops Clyst Parish Council as follows:

Bishops Clyst Parish Council cannot support the new community being proposed between the A3052 and the A30, part of which would be within our parish.

Councillors, having examined the proposals at an exhibition held at Clyst St Mary Village Hall, unanimously agreed to object. Should it transpire however, that the new community does go ahead, we consider it is vital that a substantial new link road is constructed between the A30 and A3052 to divert through traffic away from the already heavily congested area around Clyst St Mary and Motorway junction 30 at Sandygate.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Broadclyst Parish Council supports a Local Plan that fosters well-planned, sustainable development while protecting the unique rural character, heritage, and environmental assets of the parish. This representation highlights the need for proportional, infrastructure-led growth that aligns with the principles set out in the National Planning Policy Framework (NPPF) and the Broadclyst Neighbourhood Plan. We strongly advocate for development policies that ensure infrastructure is delivered alongside housing, rather than in reaction to it. This includes adequate transport networks, education and healthcare facilities, and green spaces that enhance community well-being. Furthermore, affordability must remain a cornerstone of housing policy, with homes priced in accordance with local income levels to support community retention and social cohesion. The proposed new community in the West End must be subject to robust scrutiny, with clear commitments to infrastructure, sustainability, and local engagement in its planning and delivery. Lessons learned from past large-scale developments, such as Cranbrook, should inform the design and governance of new settlements to prevent repeating previous shortcomings. Broadclyst Parish Council urges East Devon District Council (EDDC) to ensure that development is truly sustainable—not only in environmental terms but also in its long-term social and economic viability. We call for stronger commitments to active travel, biodiversity protection, and high-quality design standards that reflect the distinctiveness of Broadclyst Parish. Finally, meaningful dialogue between EDDC and Broadclyst Parish Council is essential to ensuring that local concerns are genuinely addressed. We reiterate the need for collaborative working to refine housing allocations, infrastructure delivery, and policy implementation, ensuring that the voices of local residents are at the heart of decision-making. Broadclyst Parish Council remains committed to shaping a Local Plan that balances growth with sustainability, delivering a future where our parish continues to thrive while preserving the qualities that make it a special place to live and work.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The proposed new community between the A30 and A3052 requires further scrutiny. Lessons must be learned from the development of Cranbrook to ensure that:

1.5.1. Infrastructure is in place before or alongside housing, as required by NPPF paragraph 73, which states that large-scale developments should be well-planned and phased appropriately.

1.5.2. The community is designed with sustainable transport links, aligning with NPPF paragraphs 104-106, which promote active travel and public transport integration. The Devon LCWIP should be referenced as a key guiding document for ensuring safe and effective walking and cycling routes.

1.5.3. There is genuine local engagement in shaping its development, as per NPPF paragraph 16, which emphasizes the importance of community involvement in plan-making.

Full name: Alexandra Robinson

Organisation (where relevant): Cranbrook Town Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The Local Plan should include specific provisions to ensure that, in strategic development, management of large scale public open space remains in public ownership. Particularly in light of impending devolution and a move towards a two tier local government arrangement where the important role of Town and Parish Councils comes into sharp focus. The opportunity should also be taken to address the current disparity about how services are paid for across the whole District. In addition, that the new second community administration is put in place at an early stage to ensure that it is available to offer a viable open space management option from the outset.

The Local Plan should include specific provision to ensure that the Local Planning Authority is in charge of the delivery of the second new community through the formation of a development corporation. The aim is to ensure that infrastructure is delivered effectively and on time. Whilst there are words to this effect in the Plan they are not underpinned by the presence of a governing body within the local authority that not only oversees delivery but drives it.

Full name: Loretta Commons

Organisation (where relevant): Devon & Cornwall Police

Other party name (if relevant): Womble Bond Dickinson (UK) LLP

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Strategic Policy WS01 of the Publication draft Local Plan concerns the “Development of a Second New Community East of Exeter.” The text accompanying the draft Policy provides a description of the proposed development, together with the housing trajectory to be delivered in this plan period, but also beyond its life span to accommodate at least 10,000 new homes. Adequate police infrastructure and facilities is critical for the provision of the safety and security of the public and to accord with the overall objectives of the NPPF. The lack of reference to the creation of “safe places” is of considerable concern to DCP. As with Strategic Policy DS01 of which requires at paragraph E due regard for important aspects of detail and quality with reference to safety and reduction to the potential for crime being reflected in paragraphs 1, 3, 4, 6 and 7, there should be consistency with the objectives of maintaining safety and security throughout the relevant policies in the new Local Plan for East Devon. The Police ask for a modification to the fourth paragraph of Strategic Policy WS01 to include the following wording in bold: Strategic Policy WS01: Development of a Second New Community East of Exeter “Development will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis. The new community will be built to distinctive high quality design standards by creating safe places with an explicit focus on sustainable construction and building operation and renewable energy production and use. Open spaces and facilities will be readily accessible to all residents with convenient, attractive and safe pedestrian and cycle links within the site and to local destinations and access to high quality public transport services. Working with our partners together with the relevant infrastructure service providers we will promote development starting in this plan period.....” Draft Strategic Policy WS01 also states that “Infrastructure provision will need to come forward with overall development proposals.” And, whilst the wording of the draft Policy cites examples of infrastructure that include Habitat regulations, high speed broadband and

improved transport links amongst others, there is no reference to the requirements and provision of “public service infrastructure” to reflect the NPPF, specifically the policing provisions for the Second New Community. To ensure that the policing infrastructure, police provision and funding sources are sufficient and deliverable, the Police ask for a modification to Strategic Policy WS01 to include the following wording in bold: The Council will produce an Infrastructure Delivery Plan that will set out key requirements recognising the need for improved transport links, public rights of way network, cycle networks, bus services and road improvements, community energy/heating provision, on-site renewable energy generation, drainage and SUDS requirements, new education provision, police infrastructure, high speed broadband and other services and facilities to ensure sustainable development is delivered. Policy support for police infrastructure funding via CIL and Section 106 obligations / contributions There are statutory tests in Regulation 122 of the CIL Regulations which are repeated as policy test in the NPPF. These tests apply whether or not there is a levy charging schedule for the area. The tests are that planning obligations may only be required and constitute a justification for granting planning permission if they are: 1) Necessary to make the development acceptable in planning terms; 2) Directly related to the development; 3) Fairly and reasonably related in scale and kind to the development. It is considered that police infrastructure required to provide a safe community, where crime and disorder and the fear of crime do not undermine quality of life or community cohesion, and measures are taken to deter crime, is social infrastructure that is essential to achieving sustainable development. 5 There is a correlation between an increase in population and an increase in crime and disorder. Development at the proposed Second New Community and any development elsewhere in the District will not only necessitate additional policing within East Devon, but also within Exeter City. It follows that the potential funding sources to deliver police infrastructure would need to be through CIL/Section 106 obligations/contributions generated from the Second New Community, and other new development in the District. The principle of seeking contributions towards policing infrastructure is well established, and also included in Council’s definition of ‘qualifying infrastructure’ as eligible for CIL funding. As such, the Police would expect this to be reflected in the forthcoming preparation of the IDP supporting the delivery of the Second New Community. However, it is also critical that the Police is engaged in connection with the emerging IDP to ensure sufficient contributions can be contributed to police infrastructure in connection with new development, and of which aligns with the principles of the revised NPPF in paragraph 101.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 police infrastructure required to provide a safe community, where crime and disorder and the fear of crime do not undermine quality of life or community cohesion, and measures are taken to deter crime, is social infrastructure that is essential to achieving sustainable development. 5 There is a correlation between an increase in population and an increase in crime and disorder. Development at the proposed Second New Community and any development elsewhere in the District will not only necessitate additional policing within East Devon, but also within Exeter City. It follows that the potential funding sources to deliver police infrastructure would need to be through CIL/Section 106 obligations/contributions generated from the Second New Community, and other new development in the District. The principle of seeking contributions towards policing infrastructure is well established, and also included in Council's definition of 'qualifying infrastructure' as eligible for CIL funding. As such, the Police would expect this to be reflected in the forthcoming preparation of the IDP supporting the delivery of the Second New Community. However, it is also critical that the Police is engaged in connection with the emerging IDP to ensure sufficient contributions can be contributed to police infrastructure in connection with new development, and of which aligns with the principles of the revised NPPF in paragraph 101.

CONCLUSION Section 17(1) of the Crime and Disorder Act 1998 (1998 Act) places a duty on all local authorities to consider crime and disorder implications. The latest iteration of paragraph 101 of the NPPF places "significant weight" on the need for police infrastructure and facilities to be considered in the decisionmaking process. There is clear national and local policy, including appeal decisions in support for the need for police infrastructure and facilities. The proposed policies in the East Devon Local Plan should be modified to ensure there is sufficient regard to the provision of police infrastructure and facilities, together with funding resources through contributions and obligations secured through Section 106 Agreements, and CIL.

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.: The Police wish to have the opportunity to participate to be able to provide comments on the amendments proposed and address any issues directly.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Para 5.6 suggests that this would be a ‘zero-carbon’ town. Does this mean net-zero i.e. the construction phase carbon use will be offset as well as materials etc.? Clarity is recommended on this matter. We are glad to see that the policy specifically refers to the associated infrastructure and infrastructure capacity, including the reference to green and blue infrastructure. However, the ‘Wastewater Treatment Works’ section of the policy could be stronger. The first sentence should read: “The development must include a new wastewater treatment works to ensure capacity is available to support the development programme...” In para 4.7, we note that the development will ensure a wide range of services and facilities supported by substantial infrastructure provision. For clarity, it would be worth amending the last sentence of para 4.7 to the following: “Alongside housing delivery, key facilities including a secondary school will be planned and built to service the new community and surrounding areas” The timing/phasing or works will be a key consideration for the new town. The infrastructure, which is needed must align with the phasing, so that even as the town is being built, the completed parcels are served by adequate infrastructure, and not reliant on separate parcels/ adjacent sites. This is where the allocation-wide masterplan and the allocation-wide infrastructure delivery strategy will be valuable. There may be options to use Grampian conditions for development proposals to ensure no construction/occupation of certain units until the sewerage infrastructure is operational.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: At present we do not consider that Policy WS01 represents a positive strategy for the historic environment. This issue can be resolved through modest adjustments to the Plan. We support the requirement for development to follow a masterplan that will cover the whole new community. While we are also supportive of the requirement to build distinctive high quality design, this statement in itself does not help to secure the stated aspiration (in the vision) that design should be innovative and “draw inspiration from the local context, including the unique surrounding historic environment, to create a rich character”. To ensure that the policy framework is clear (consistent with NPPF paragraph 16d) and provides a clear design vision and expectations at an early stage (consistent with policies in NPPF Chapter 12) we request that the policy is adjusted to secure these aspirations as policy commitments. We welcome the commitment to minimum densities, with higher densities in centres. This is consistent with the NPPF aspiration to make effective use of land. This in turn can help to reduce pressure for development in other locations where there may be greater impacts on the environment, including heritage. However, we are concerned that at present the policy says nothing about how development will address heritage assets or historic landscapes within and around the site, responding to NPPF paragraph 196 and other policies in Chapter 16. We believe that this should include: (i) a commitment to innovative design that responds to local character (as above), (ii) provisions to encourage identification of heritage assets and features – including listed buildings and wood pasture/parkland – that may be positively integrated into the scheme as focal points, for public access or to inform a distinct character for the community, (iii) provisions to ensure that proposals seek to conserve and enhance designated and non-designated heritage assets and their settings in a manner appropriate to their significance, including the potential for undiscovered archaeology.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: “Development will need to occur and proceed on the basis of an agreed whole new community masterplan and on an agreed phased basis. The new community will be built to distinctive high quality design standards, drawing inspiration from the local context including the unique surrounding historic environment, to create rich character. Design should also be innovative, with an explicit focus on sustainable construction and building operation and renewable energy production and use...” Amend policy to include appropriate heritage provisions, thus securing a positive strategy for conservation and enhancement of the historic environment consistent with NPPF para 196 and associated policies.

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: 32. We understand that the Cranbrook Plan will continue to apply to development at the Cranbrook New Community. The Cranbrook Plan has an end date of 2031, and it is stated that a new plan will supersede it before then. The Cranbrook Plan includes policies to expand the town to nearly 8,000 homes. It is unclear if further expansion of Cranbrook would be targeted in any replacement plan for the area. Should further growth be targeted beyond 8,000 homes then it is recommended that the review of any additional infrastructure requirements will need to be undertaken as part of the Local Plan review process. 33. The East Devon Options Appraisal Report identified a vision for the Second New Community that included a development embedded in a well-connected and integrated active travel network with comprehensive links to nearby employment, surrounding countryside and the city of Exeter. However, no indication is provided of the proposed access, transport and land use strategy that would deliver travel and transport in accordance with this vision, and limited information has been set out in terms of future travel demands generated by the New Community and how these will be managed and facilitated. We have separately fed comments back to East Devon District Council and Devon County Council on this matter, and expect further information to be included in the Regulation 19 consultation for the site. 34. Strategic Policy WS01 seeks to allocate land for the New Community to accommodate at least 8,000 new homes. However, the policy is clear that the new community will ultimately need to accommodate at least 10,000 new homes. Development build-out to the end of the Local Plan period (2042) is expected to comprise around 3,300 new homes, at least 17.5 hectares of employment land (use classes E, B2 and B8), and at least 5 hectares of operational town centre uses. The Policy goes on to state that beyond 2042, around 4,700 additional new homes will be delivered on allocated land with a further 2,000 homes then required for which land will need to be allocated in subsequent development plans. A further 30 hectares of employment land will also be delivered after 2042, along with a further 10 hectares of town centre uses. 35. In respect of infrastructure, the policy states that the Council will produce an IDP for the New

Community. Development proposals will need to accord with an Infrastructure Delivery Strategy (to align with the IDP produced by the Council), an allocation-wide masterplan, and Phasing Strategy. Each planning application will need to incorporate details of development and infrastructure phasing and demonstrate that the development does not compromise the ability to deliver the required infrastructure or prejudice the integration of future development at the new community beyond the plan period. It is also stated that development proposals will be expected to contribute to the costs of new infrastructure and in appropriate cases the forward-funding of new infrastructure by the Council, developers or third parties may take place. 36. Overall, National Highways reserve the right to comment further on Strategic Policy WS01 once further details are available as part of the Regulation 19 consultation for the New Community. However, we would highlight concern that the need for and detail of strategic transport infrastructure to support delivery of the site is currently unknown. We are aware that Devon County Council are progressing further work in respect of the vision for the New Community and transport evidence base. However, the implications in terms of infrastructure requirements, and the ability to avoid significant adverse impacts to the SRN are currently uncertain. 37. As currently drafted and considered alongside the evidence so far published, the New Community proposal is likely to have a significant and unacceptable adverse impact on the safe and efficient operation of J29 & J30 of the M5 and the A30. Without the identification of appropriate strategy, action and interventions to deliver and subsequently monitor manage future adaptation to achieve the vision statement for the development and the securing of necessary transport interventions in Policy, National Highways considers that the Plan is unsound as it does not comply with national policy as set out in NPPF.

Full name: Craig Hatton

Organisation (where relevant): Network Rail

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: Network Rail considers this Policy to be sound. The Policy positively plans for new development and is consistent with the NPPF in that infrastructure is to be provided to support development. Network Rail and South Western Railway have been in discussions with East Devon around ensuring that new settlements support the provision of improve rail connections. Plans have been developed to connect East Devon through the new Devon Metro rail link that connects towns to reduce vehicular traffic on the A30. The phasing of development as within the Policy is supported to ensure that the required infrastructure is provided and fully funded in a timely fashion. The mechanism to allow the retrospective collation of funding for forward funded infrastructure is also supported.

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:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:

- There are potential overcrowding implications for some Exmouth to Paignton services as a result of the promotion of sustainable transport modes via rail.
- We propose that Digby & Sowton station is well placed to act as a railhead for the new community. We have a concept for a regular 4 train per hour service from there to Exeter and beyond, subject to investment in the line between Exmouth Junction and Digby. If suitably linked to the new community with regular buses, this could provide effective, attractive public transport links to the city. Network Rail would be happy to discuss this further with East Devon District Council if desired.

Full name: Lucy White

Organisation (where relevant): Lucy White Planning Limited

Other party name (if relevant): National Grid Electricity Distribution (South West) Plc (NGED)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: These representations are prepared on behalf of National Grid Electricity Distribution (South West) Plc (NGED) (formerly Western Power Distribution (South West) Plc, in response to the Regulation 19 East Devon Local Plan which is subject to public consultation. Introduction NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers. In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons. Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm: a) whether the lines can be accommodated within the development site; or b) the viability and feasibility of diverting and/or undergrounding overhead lines. This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy. In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. NGED cannot

be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with NGED prior to the adoption of the Local Plan. In light of the above, NGED does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:

1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.
2. Early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;
3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.
4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED. Strategic Policy WS01 The Local Plan allocation for the proposed new community of circa 8,000 dwellings is traversed by NGED's Exeter Main 132kV line, a strategically important electricity supply line within East Devon. This infrastructure serves thousands of residents and businesses in the Exeter area and is critical to maintaining supply in the short, medium and long-term. Any proposals to divert or underground this line would be highly challenging and disruptive to supply and NGED would object to development proposals which are reliant upon such works. NGED has licence obligations to operate the network economically and efficiently. Therefore NGED's preference is for the overhead line to remain in situ and any proposals for a new settlement to be designed around them. The retention of the strategically important Exeter Main SGP and distribution station is critical to maintaining the city's electricity supply and cannot be prejudiced by development proposals which would themselves place a significant additional burden on the electricity supply. Moreover, it is not always possible to divert 132kV lines and if a diversion were possible, it would need to accommodate two larger terminal towers and a 10m wide corridor above the undergrounded cables, which would be required to remain open land. Such land is unsuitable for buildings, public highway and any other development which would obstruct access to the cables. Early consideration of the overhead lines in the masterplanning process can enable the lines to be sensitively and efficiently designed

into the development. NGED alerted East Devon Council to the presence of the line and its requirements at the Regulation 18 stage. Strategic Policy WS01 does not refer to the existing electricity infrastructure or the need to safeguard this infrastructure through the development of the new community. NGED notes and welcomes the policy requirement for an allocation-wide masterplan, Infrastructure Delivery Strategy and Phasing Plan to be submitted and approved prior to commencement of any development. To ensure the masterplanning process is effective in safeguarding the existing electricity infrastructure, Policy WS01 should be amended to include reference to the 132kV lines and the need to incorporate the lines in situ through the masterplanning exercise. NGED also notes that around 150 hectares of land will be required as Suitable Alternative Natural Greenspace (SANGs) to meet Habitat Regulations requirements. Land beneath overhead powerlines could be utilised for SANGs and other biodiversity net gain enhancements.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 Local Plan allocation for the proposed new community of circa 8,000 dwellings is traversed by NGED's Exeter Main 132kV line, a strategically important electricity supply line within East Devon. This infrastructure serves thousands of residents and businesses in the Exeter area and is critical to maintaining supply in the short, medium and long-term. Any proposals to divert or underground this line would be highly challenging and disruptive to supply and NGED would object to development proposals which are reliant upon such works. NGED has licence obligations to operate the network economically and efficiently. Therefore NGED's preference is for the overhead line to remain in situ and any proposals for a new settlement to be designed around them. The retention of the strategically important Exeter Main SGP and distribution station is critical to maintaining the city's electricity supply and cannot be prejudiced by development proposals which would themselves place a significant additional burden on the electricity supply. Moreover, it is not always possible to divert 132kV lines and if a diversion were possible, it would need to accommodate two larger terminal towers and a 10m wide corridor above the undergrounded cables, which would be required to remain open land. Such land is unsuitable for buildings, public highway and any other development which would obstruct access to the cables. Early consideration of the overhead lines in the masterplanning process can enable the lines to be sensitively and efficiently designed into the development. NGED alerted East Devon Council to the presence of the line and its requirements at the Regulation 18 stage. Strategic Policy WS01 does not refer to the existing electricity infrastructure or the need to safeguard this infrastructure through the

development of the new community. NGED notes and welcomes the policy requirement for an allocation-wide masterplan, Infrastructure Delivery Strategy and Phasing Plan to be submitted and approved prior to commencement of any development. To ensure the masterplanning process is effective in safeguarding the existing electricity infrastructure, Policy WS01 should be amended to include reference to the 132kV lines and the need to incorporate the lines in situ through the masterplanning exercise. NGED also notes that around 150 hectares of land will be required as Suitable Alternative Natural Greenspace (SANGs) to meet Habitat Regulations requirements. Land beneath overhead powerlines could be utilised for SANGs and other biodiversity net gain enhancements.

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: Lucy White

Organisation (where relevant): Lucy White Planning Limited

Other party name (if relevant): National Grid Electricity Distribution (South West) Plc (NGED)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See attached representation letter.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 attached representation letter.

4. Do you consider that this part of the Development at the West End 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: Malcolm Dicken

Organisation (where relevant): NHS Devon Integrated Care Board and Royal Devon University Healthcare NHS Foundation Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The ICB is very concerned about the development at the West End (Chapter 4) and the infrastructure required to support the second community. The vision states that this new community will be 'self-sustaining' yet that narrative that follows appears to have ignored the ICB response submitted on the 8th of July 2024 which included:

6. The plans for the developments close to Exeter, from a health perspective are unsustainable. There are no viable plans to be able to expand the capacity of primary care infrastructure to meet the increase in population without a considerable contribution from the development that is ring fenced for healthcare investments. NHS Devon ICB | 2

7. There is currently a lack of primary care infrastructure capacity to meet the population of Exmouth and any future proposed expansion in the number of dwellings would have to be accompanied by a direct developer contribution to mitigate the impact created.

8. The surgeries that provide primary care services to Broadclyst, Lymptstone and Woodbury are already working with more patients than they capacity for, therefore the spatial strategy needs to reference the unsustainable state of access to healthcare. The surgery in Colyton is very close to capacity and any new future developments may be at a point where the practice is already over capacity. Furthermore the 'Strategic Policy WS01: Development of a second new community east of Exeter' specifically references the need for new schools but fails to include any mention of the new GP facilities that will be required to support proposed housing.

WS02

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS02

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: We would welcome the inclusion of reference to the requirement for protection and enhancement of our natural environment within this section.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: We would welcome the inclusion of reference to the requirement for protection and enhancement of our natural environment within this section.

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS02

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

- A repeat of the failed Science Park (which has been unable to repay its loan to EDDC?) and Sky Park requirements for specific use – any lessons learnt? This policy allows most types of development, except for stand-alone large scale warehousing and distribution. It allows warehousing and distribution site as a limited part of a mixed-use development and requires the sites to deliver high value employment. The problem is that none of the above defines ‘large scale’ or ‘high value’ There is also the requirement to connect to the district heating schemes based at Sky Park and Monkerton – are these working well enough to take more connections?

WS03

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS03

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Policy include the phrase ‘supporting green and grey infrastructure’.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: This terminology should be strengthened to state ‘delivery of high quality green infrastructure’.

WS04

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS04

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Policy WS04 should reflect the need for appropriate education contributions to support this development and recognise this as a requirement to support the policy. Requested changes to Policy WS04 are shown below: “Appropriate contributions towards education facilities are required to support this development.”

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS04

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:
Policy includes the phrase ‘supporting green and grey infrastructure’.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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.: This terminology should be strengthened to state ‘delivery of high quality green infrastructure’.

WS05

Full name: Robert Barnes

Organisation (where relevant): Planning Prospects Ltd

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

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS05

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: EDAL support the inclusion of a policy which supports the growth and expansion of the airport and airport related businesses and operations. However, it is considered that some amendments to the draft policy are needed to ensure that it supports an appropriate strategy for the Airport and will be deliverable over the Plan period.

It is not clear why the draft policy should be restrictive in terms of the types of development supported within the operational boundaries, with a different approach to the north and south of the runway. Appropriate development should, flexibly, be allowed anywhere within this area to support the growth and expansion of the airport and reinforce its role as key infrastructure within the sub region.

Restrictions on noise sensitive development and in relation to safeguarding are appropriate. However, as currently drafted it is considered that there is some potential for confusion and misinterpretation. The text as currently drafted implies that the safeguarding provisions apply to the 57db noise contour when in fact they are independent of that and operate universally.

The text that suggests the policy does not apply to the Cranbrook Plan Area is inappropriate. Noise and safeguarding provisions should apply wherever they are relevant. Any new developments which prejudice or adversely impact on the core operational role and functions of the Airport should be prevented, wherever they would be located.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Parts A and B of the draft policy should be replaced with text to read, “Land will be allowed to support aviation related development, including employment, training / education, research and development, maintenance / repair / overhaul, freight / cargo, and other activities associated with the function of the Airport handling the movements of passengers and freight. This can include occupiers who rely on proximity to an Airport or who benefit from a transferrable skill base as well as to support the developing logistics cluster.”

The paragraph dealing with noise and safety should be replaced with text to read, “Beyond airport operational boundaries noise sensitive development within the 57db noise contour around the airport will be restricted (in order to ensure future airport operations are not adversely impacted). Development proposals must not have a material impact on the operation of navigational and safety systems or any safeguarding requirements of the airport.”

The final sentence of the draft policy excluding its effect on the Cranbrook Plan area should be deleted.

4. Do you consider that this part of the Development at the West End 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.

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS05

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

- Refusal to acknowledge airport location should prevent further development – cake and eat it This policy determines that growth and expansion of the airport operation will be supported within its current operational boundaries. This almost seems to be an oxymoron since its either one or the other. Beyond airport operational boundaries noise sensitive development within the 57db noise contour around the airport will be restricted. From the NDO point of view, the applicable noise contours need to be determined and agreed and not have out of date information as the base line.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS05

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The airport area is close to the grade II* Church of St Michael and other designated heritage assets. There are also a range of non-designated heritage assets associated with the WWII airfield within and around the site. We therefore request additional provisions within this policy, consistent with the approach to other site allocation policies affecting heritage assets.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 should refer to the need to conserve and enhance designated and non-designated heritage assets and their settings, including the grade II* Church of St Michael and the WWII heritage of the airfield.

WS06

Full name: Chris Dadds

Organisation (where relevant): JLL

Other party name (if relevant): Charles Kislingbury on behalf of L Askew

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS06

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See below.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Draft Policy WS06 allocates an area of 24.34 hectares of land east of the existing airport buildings, and lying either side of Long Lane, for employment use.

Our client's land interest relates to the majority of the land identified under this allocation. Our client wholly supports the principle of the proposed development allocation on 'land east of airport' under policy WS06.

The proposed allocation is set to come forward for a mixed-use business park. The land is situated adjacent to Exeter airport as well as Power Park which benefits from a Local Development Order allowing up to 26,000 sqm of additional employment space. The subject site is therefore suitably placed to provide further land to support ongoing employment and commercial activities in the West End of the district.

The draft policy wording outlines a series of land uses which are considered appropriate to come forward as part of the allocation as follows:

“A. B2 (general industrial); B. B8 (storage and distribution); C. E(g) (Uses which can be carried out in a residential area without detriment to its amenity):

1. Offices to carry out any operational or administrative functions,
2. Research and development of products or processes;
3. Industrial processes; D. A limited element of ancillary uses such as indoor sports, recreational or café will be permitted but only where strictly supporting and subordinate to the development of the above employment uses; E. With its proximity to Exeter Airport the site is well positioned to assist the role of the airport. Uses which relate to the aviation sector and its wider supply chain will be particularly supported alongside other high value employment uses that facilitate economic growth within the area.”

To ensure greater flexibility, the policy wording should include a bullet reference between ‘c’ and ‘d’ to read “sui generis uses that exhibit characteristics of a similar nature to the uses listed above”. Expanding the category of land uses to include sui generis uses aligned with the principal allocation uses would appeal to a wider market thus providing an attractive and flexible development opportunity which in turn supports delivery.

Criteria ‘d’ includes subjective language which is not conducive for clear policy wording. The NPPF (paragraph 16) requires policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Plans and policies are required to be consistent with national policy in order to be found sound having regard to paragraph 35 of the NPPF.

Criteria ‘d’ should therefore be re-written as follows to provide a simplified and clear policy requirement.

“D. Ancillary uses which support the functioning of the employment area including indoor sports, recreational or cafes”.

The supporting text to the policy should also be updated to note that the list of uses set out under criteria ‘d’ is not exhaustive.

Draft policy WS06 notes that “This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. The masterplan must include measures to provide fully for infrastructure requirements and appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Planning permission will not be granted for any individual parcel of land in the allocation in the absence of this Masterplan.”

Our client supports the principle of a masterplanning approach to ensure a comprehensive and coordinated approach is taken to ensure delivery of high-quality place-making, however the following comments and observations are made in respect of this policy requirement.

It is not clear who is to agree the proposed masterplan and by what process. For example, whilst our client is the majority landowner for the proposed allocation and is open to working with other parties in bringing forward the land for development, it is not clear what the implications would be if other landowners did not engage in this process and needed to agree a masterplan for the whole site.

The assertion that planning permission on individual parcels of land will not be granted in the absence of a masterplan could stymie development for the reasons given above. As such, greater flexibility should be sought for the policy requirement around masterplanning.

Proposed alternative wording could read as follows:

“This allocation will need to come forward on the basis of masterplan that clearly demonstrates how comprehensive development will be undertaken or that opportunities have been sought to progress co-ordinated forms of development with other sites in the locality. The masterplan must include measures to provide fully for infrastructure requirements and appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels.”

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.: To ensure the Local Plan and policies contained within are found sound having regard to the NPPF.

Full name: Robert Barnes

Organisation (where relevant): Planning Prospects Ltd

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

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS06

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: EDAL support measures which will encourage employment development in appropriate locations well related to the Airport, particularly where this will relate to the aviation sector and the role of the Airport more generally. However, EDAL have very considerable concerns that the significant expansion in employment space proposed in this location to the east of the terminal cannot be accommodated without significant highways harm and an unacceptable impact on access to the Airport.

Land immediately east of the Airport's long stay Car Park 4 is already the subject of a Local Development Order (LDO). This land is referred to in the Regulation 19 document (paragraph 4.25) and the effect of the LDO is to grant planning permission here for an extended period within a specified set of parameters and subject to limited conditions.

The granting of the LDO was a missed opportunity to resolve highways and accessibility issues locally. EDAL engaged extensively in the consultation process around the LDO and highlighted that even with the addition of a series of limits and controls to the development it allowed it would still have a material negative impact on the operation of the highways network locally. The Council essentially accepted this. They acknowledged that with the LDO scheme the key junction (Long Lane / B3184) would operate above capacity and with queues at peak times extending back beyond the entrance to the Airport. Weaknesses were also identified in terms of pedestrian, cycle

and public transport access. The LDO was nonetheless passed due to the benefits its implementation would deliver.

This position, whilst unacceptable and damaging to the Airport, is nonetheless embodied in the LDO. The implementation of development allowed by the LDO will already create real difficulty at this junction to the detriment of the Airport and without mitigation to address this harm.

Similar observations were made on behalf of EDAL in relation to other development proposals to the east of the terminal, further along Long Lane at McBain's Antiques (ref. 22/2578/MOUT), and south of Long Lane at Fair Oak Close (24/1049/FUL). Commercial development was ultimately approved in both cases with the officers' delegated reports referring to EDAL's comments about difficulty with the Long Lane / B3184 junction and accessibility generally, but not addressing them.

Additional traffic associated with a further potential allocation of 24.34ha of employment land east and south east of the LDO site either side of Long Lane would be very substantial, and far greater than that already associated with the LDO development plus smaller permitted schemes referred to above. This would add very considerably to the impact at the Long Lane / B3184 junction; the vast majority of trips associated with such an allocation would pass across it. The pre-existing inadequacy of the junction will already be made worse (without any mitigation offered) by the LDO scheme. The impact of the McBain's Antiques development will be layered on to this (again with no mitigation offered), and the impact of the Fair Oak Close scheme added to that.

Any development which increases traffic at the Long Lane / B3184 junction should be required to provide measures for its improvement so that the harmful impact on the Airport and its access can be reduced. Absent such measures further development should not be allowed. At some point the Council must grapple with the fact that this junction already operates above capacity, this has a negative impact on the running of the Airport, the Airport is infrastructure of some considerable sub-regional importance, and simply adding to this harm without remedying the situation is untenable and should not be allowed. New development relying on access to Long Lane east of the entrance to the Airport should not be allowed until this is resolved.

It is acknowledged that the draft Policy looks for mitigation to avoid additional traffic negatively impacting on the operation of the local highway network in particular the Long Lane B3184 Intersection. However, two observations should be made in this regard.

First, the operation of this junction is already unacceptable. Any allocation affecting it must be required to make its operation better, not just avoid negative effects as suggested by the draft Policy.

Second, and more fundamentally, it is already the case that the 7.7ha LDO site will have a detrimental impact on this junction, made worse by other smaller scale permissions locally. The further impact of traffic associated with an additional 24.34ha would dwarf this, and make an already unacceptable situation substantially worse. Long Lane is narrow, unsuited to major employment development, and the potential for further enhancements to it in the stretch west of the Hilton hotel is very limited. The land available for a meaningful upgrade at the junction of the B3184 and Long Lane is limited.

This constraint is so significant that the allocation should not be allowed to proceed unless convincing evidence is produced to show that mitigation is deliverable that would support the associated traffic adequately on the network and improve the operation of the junction of the B3184 and Long Lane. EDAL have reviewed the evidence base published alongside the Regulation 19 document and could not see that such an exercise has been completed.

The Site Selection Report (SAL-016) refers to recent and planned improvements to highways locally, but also to wider junction capacity constraints. An initial site assessment has been completed from a transport perspective (TRI-023) but this only addresses residential sites. Unless evidence is provided showing how a successful outcome can be delivered here the proposed allocation must not proceed.

Finally, if it is possible to overcome this constraint and the allocation is retained, criterion D should be amended. There is no good reason why indoor sports or recreational activity should be allowed here. Some food and beverage activity might be appropriate to serve the local workforce but leisure use cannot sensibly be offered as

somehow supporting the employment use, and would also contribute to the traffic difficulties here.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Unless convincing evidence is made available to demonstrate the allocation can be made acceptable from a highways and access perspective the allocation should be deleted. Reference to sports and recreational uses should be removed.

4. Do you consider that this part of the Development at the West End 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.

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS06

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: ‘Protection of the County Wildlife Site’ should be strengthened to ‘Protection and enhancement of the County Wildlife Site (in line with Environment Act 2021 requirements), including sufficient buffering from development’.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: ‘Protection of the County Wildlife Site’ should be strengthened to ‘Protection and enhancement of the County Wildlife Site (in line with Environment Act 2021 requirements), including sufficient buffering from development’.

Full name: Helene Jessop

Organisation (where relevant): RSPB

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS06

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As para 4.28 makes clear, the site is in a Nitrate Vulnerable Zone and Impact Risk Zones for the Exe Estuary SPA and East Devon Pebblebed Heaths SPA and SAC, so needing effective management of water discharge and air pollution impacts. The HRA (Footprint Ecology, 30/1/25) makes clear that the Council as yet has no strategy to deal with vehicle emissions and maintain/improve air quality. The absence of an effective strategy means increased emissions associated with the proposed development will increase nitrogen deposition on the heaths, damaging the vegetation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 wording should be amended to make clear that development will not proceed until the Council has an effective strategy and implementation measures that will be applied to mitigate increased emissions.

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS06

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

- Incomplete This policy relates to the land lying either side of Long Lane and relates to a mixed-use business park. The development land will need to come forward as an agreed (with whom?) masterplan to take account of infrastructure (undefined), archaeology, flood risk, etc etc. The effect of this Masterplan will be felt widely and the parish council should be consulted on the details it contains.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS06

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: This policy prescribes several actions/ needs for an application to come forward on this site. A solution for foul drainage will need to be identified and delivered at this location. At present the site is not connected to a mains sewer network.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS06

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: While we welcome the commitment to archaeological assessment and heritage impact assessment (HIA) on this site, the approach of requiring these explicitly within the site allocation policy is not used consistently throughout the Plan. In particular, HIA is not generally referred to for other site allocations. It may therefore be preferable that for all relevant sites these requirements are established by Strategic Policy HE01: Historic environment, and Policy HE04: Archaeology and Scheduled Monuments.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Review approach to requiring archaeological assessment and HIA as part of site allocation policies throughout the Plan, perhaps ensuring that the former is included on those sites where it is a critical pre-commencement requirement. To ensure that HIA is secured on all relevant sites, amend Strategic Policy HE01.

WS07

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS07

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

- Infrastructure not explained Another bit of Clyst Honiton land being allocated for employment. The local roads are going to be inundated with traffic which does not flow currently and there needs to be a set of highways schemes laid down that will enable these developments without completely gridlocking the network. Its Ok having housing and employment allocations spread around the area with each having to contribute their bit, but this will not produce the finance for the major schemes that will be necessary to cope with all the new demands on top of the current ones.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS07

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: For clarity, the sentence regarding flood risks should be changed to reflect the principles of the sequential test. We suggest the following wording: “If development, including the cycle and pedestrian accesses cannot be designed to avoid the area mapped as having a risk of flooding, a site-specific Flood Risk Assessment will be required.” Given that this is a key constraint of the site, we would suggest that the ‘justification for plan policy’ paragraphs include flood risk and the need to take a sequential approach to the layout of the proposal.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS07

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As with Strategic Policies WS05 and WS06, this site is in relatively close proximity to a range of designated and non-designated heritage asset. We request that an additional policy criterion consistent with those policies.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 should refer to the need to conserve and enhance designated and non-designated heritage assets and their settings, including grade II Treasbeare Farmhouse.

Full name: Helene Jessop

Organisation (where relevant): RSPB

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS07

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As para 4.34 makes clear, the site is in a Nitrate Vulnerable Zone and Impact Risk Zones for the Exe Estuary SPA and East Devon Pebblebed Heaths SPA and SAC, so needing effective management of water discharge and air pollution impacts. The HRA (Footprint Ecology, 30/1/25) makes clear that the Council as yet has no strategy to deal with vehicle emissions and maintain/improve air quality. The absence of an effective strategy means increased emissions associated with the proposed development will increase nitrogen deposition on the heaths, damaging the vegetation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 wording should be amended to make clear that development will not proceed until the Council has an effective strategy and implementation measures that will be applied to mitigate increased 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)

WS08

Full name: Chris Dadds

Organisation (where relevant): JLL

Other party name (if relevant): Charles Kislingbury on behalf of L Askew

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS08

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Our client wholly supports the proposed allocation of employment land east and south of the airport. That said, we object to the proposed boundary of the allocation of land south of the A30, on the basis that our client holds additional land which should form part of the proposed allocation.

The subject site is a triangle parcel of land measuring 0.8 hectares situated immediately adjacent to the allocated land and south of the A30.

The site consists of an arable field with mature trees forming the site boundaries, north, east and west and a hedgerow along the southern boundary. There are no known constraints to the development of the site and, to the south of the site, the B3184 provides direct road access into the site via an existing gated vehicle access at the southwestern corner.

The subject site lies within the West End, in close proximity to existing employment development. It has potential to provide additional small scale employment provision, as an extension to site WS08 and to compliment the strategic provision north of the A30 and the high-quality employment sites at the Airport. Providing for a mix of types, sizes

and range of employment sites is critical for providing choice and flexibility within the market to support delivery and economic growth.

Our client seeks the expansion of the boundary of the proposed allocation under WS08 to include the additional land within our client's control. The identification of this additional land will ensure that the Local Plan meets the areas objectively assessed needs and is effective as required by paragraph 35 of the NPPF.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 submission relates to the proposed employment allocation WS08: Employment land opposite the airport buildings, south of the A30 (Site Farr_01). This allocation provides for a mix of B2 and E(g) uses on the land, which is adjacent to our clients, and it is argued that the allocation should be extended to include our clients land (as shown in the attached plan) to further enhance the employment land supply in the district.

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.: To ensure the Local Plan and policies contained within are found sound having regard to the NPPF.

Full name: Robert Barnes

Organisation (where relevant): Planning Prospects Ltd

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

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS08

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: EDAL support measures which will encourage employment development in appropriate locations well related to the Airport. However, for reasons expressed elsewhere in their representations EDAL are extremely concerned about the traffic impacts of large scale employment allocations close to the Airport.

This proposed allocation is less problematic given its location and limited size. Nonetheless, it is likely that traffic associated with development here would cross the western end of Long Lane at its junction with the B3184. As explained elsewhere in these representations the operation of that junction is already unacceptable, and made worse by planning decisions taken by the Council.

To avoid any further worsening of the performance of this junction a criterion should be added to this policy to include mitigation if needed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: A criterion should be added to the

Policy requiring mitigation if needed to avoid additional traffic negatively impacting on the operation of the local highway network, in particular the Long Lane / B3184 Intersection.

4. Do you consider that this part of the Development at the West End 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: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS08

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

- Is this robust? Allocation site for small business units – NDO element The requirement here is to have private sewage/drainage measures. Given huge amount of development close by, this could be challenged.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS08

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: This policy requires the submission of a site-specific FRA which we support, however it may be beneficial to specify that this is due to the presence of the ordinary watercourse on site, and the surface water risks present, not fluvial risk.

WS09

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Waddeton Park Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 refer to the attached sheet.

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.: To emphasise the unjustified approach of including our client's land within the Clyst Valley Regional Park boundary.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr and Mrs T Adams

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 refer to the attached sheet.

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.: To emphasise the unjustified approach of including our clients' land within the Clyst Valley Regional Park boundary.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: We support draft policy WS09 and EDDC's identification of Clyst Valley Regional Park.

Land at Addlepool Farm will positively contribute to the achievement of the objectives of the CVRP and enhance linkages with the park. The delivery of Addlepool Farm will increase the number of communities that will benefit from the park, offering greater connectivity and access to a wider audience along the eastern edge of Exeter.

Vistry Group consider Land at Addlepool Farm to provide the opportunity for a sustainable new community that will strongly support the expansion of the CVRP. Development at Addlepool Farm would enable the active and healthy places criteria of the CVRP to reach its maximum potential through the Site's proximity to the expansion boundary. Addlepool Village would enhance green links with Clyst St George, providing existing and future residents with improved access to green space and public open space. Given the Site's location along the length of the proposed Clyst Valley Trail, the Walking and Cycling infrastructure of the Clyst St George would also be improved, enhancing accessibility into the CVRP and along Exmouth Road and Woodbury Road through the provision of sustainable movement.

Organisation (where relevant): Carden Group

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

4.1 We generally support the aims of Policy WS09, in respect of the Clyst Valley Regional Park (CVRP) in ensuring that development proposals within and adjacent to the CVRP will integrate Green Infrastructure and support the achievement of the objectives in the CVRP Management Plan. Location

4.2 The boundaries of the Clyst Valley Regional Park have changed between the 2021 25-Year Masterplan and the version shown in the draft emerging Local Plan policy map.

4.3 Most notably, the updated boundaries now include additional areas to the south of Cranbrook, such as the land surrounding Treasbeare Farm. However, this area does not contain any tributaries that feed into the River Clyst, which is located over a mile to the west of the farm.

4.4 As a result, many of the newly proposed boundaries appear arbitrary and misaligned with the natural geography of the Clyst Valley, where the River Clyst and its main tributaries are situated. The policy justification provides no clear evidence to explain the rationale behind these significant boundary alterations. Without such supporting evidence, the plan fails to meet the justification requirement outlined in Paragraph 36(b) of the NPPF, which states that policies must be ‘justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’.

4.5 Without clear evidence or rationale for these boundary changes, the policy does not meet this test and lacks the necessary justification to support its implementation. Viability and Practical Implications on Developments

4.6 We also have serious concerns regarding the fairness and practicality of how ecological enhancements are to be delivered within this area, particularly the disproportionate burden placed on new development proposals.

4.7 The proposal requires new developments within the CVRP to implement ecological enhancements, yet much of this land remains under private ownership, primarily used for agriculture. It therefore would not be fair to impose these requirements solely on new developments whilst allowing 9 existing landowners to continue to operate their land without any obligation to fulfil the objectives of the CVRP.

4.8 So, again although we support ecological enhancement, placing excessive ecological obligations on new development proposals within the CRVP could risk making these projects unviable, leading to delays or cancellations.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.:

4.9 Carden recommends that the boundaries of the Clyst Valley Regional Park (CVRP) be revised to accurately reflect the actual geographical extent of the valley. The boundaries should be more closely aligned with the evidence base, principally in this instance the 25-Year Masterplan for the Regional Park, which was formally approved by the Council in February 2021.

4.10 Additionally, we recommend removing the terms "close" and 'adjacent' when referring to development proposals near the park, as it is overly ambiguous and lacks clear definition. The CVRP's targets should remain achievable and focused within the 2,338 hectares covered by the extent of the park at the time the 25-Year Masterplan was written.

4.11 Regarding development proposals inside the park and their ecological contributions to the park's objectives, we recommend modifying the policy wording to: "where viable" major development proposals will contribute to as many of the CVRP objectives and targets as possible. This ensures a more flexible and pragmatic approach, acknowledging site-specific viability constraints while still supporting the overall goals of the park.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

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

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3(b). If no, please give details of why you consider this part of the Development at the West End 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.

We support the intention of Policy WS09, including the extension of the park onto land controlled by our clients. Our clients are prepared to work with stakeholders to achieve the objectives of Policy WS09 as part of the delivery of strategic scale development on land to the south. We make the following comments on detailed drafting:

- It is unsound to refer to objectives in the “CVRP Management Plan”. This is too vague, and the Management Plan is not submitted for public scrutiny as part of this examination. Similar points apply in respect of references to other documents in Policy WS09.

- Part D. SANG – duplicates Strategic Policy PB04

- No. 2. “30% tree canopy cover” is not defined.

- Final paragraph: “close” is not defined.

The Policy states that it applies across the whole local plan area. It is considered that the requirement for development anywhere in the local plan area to make financial contributions to the CVRP in Policy WS09 would not be CIL Reg 122 compliant.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Clarify scope and the above points.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

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

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: We support the intention of Policy WS09, including the extension of the park onto land controlled by our clients. Our clients are prepared to work with stakeholders to achieve the objectives of Policy WS09 as part of the delivery of strategic scale development on land to the south. We make the following comments on detailed drafting:

- It is unsound to refer to objectives in the “CVRP Management Plan”. This is too vague, and the Management Plan is not submitted for public scrutiny as part of this examination. Similar points apply in respect of references to other documents in Policy WS09.
- Part D. SANG – duplicates Strategic Policy PB04
- No. 2. “30% tree canopy cover” is not defined.
- Final paragraph: “close” is not defined. The Policy states that it applies across the whole local plan area. It is considered that the requirement for development anywhere in the local plan area to make financial contributions to the CVRP in Policy WS09 would not be CIL Reg 122 compliant.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Clarify scope and the above points.

Full name: Claire Alers-Hankey

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Strategic Policy WS09: Clyst Valley Regional Park

This policy refers to land that is allocated as the Clyst Valley Regional Park (CVRP) and the mitigation measures that will apply to all development proposed within the CVRP.

Land north of Sowton is proposed to be included within the CVRP, however the inclusion of this land is not supported by Waddeton Park Ltd.

While the CVRP allocation does not prevent development in its own right, a number of the mitigation measures required for development within the CVRP as set out in the policy would restrict the level of development that can take place on land north of Sowton. Given that the land north of Sowton holds a strategically important location within the West End, as previously identified by EDDC when the site was a draft allocation in the previous draft Local Plan, to restrict development in this location is not an appropriate strategy and is unjustified, and therefore is not sound.

4. Do you consider that this part of the Development at the West End 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.: To present the case for the inclusion of land north of Sowton as an employment allocation and to scrutinise the deliverability of the new community within Plan period timescales.

Full name: Hannah Cameron

Organisation (where relevant): HC Planning Ltd

Other party name (if relevant): Mr A Cork and Mr P Cork

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I am writing on behalf of Mr Andrew Cork and Mr Phillip Cork, the owners of Newcourt Barton Business Park, Clyst Road, Exeter, EX3 0BD. The business park and surrounding land are subject to a number of designations under the proposed Local Plan, specifically:

- Housing and Employment Allocation WS10
- Clyst Valley Regional Park WS09
- Green Wedges OL05 A consultation response was submitted in respect of the Regulation 18 draft and the views expressed in the earlier consultation response are reiterated, as it does not appear that the Council have sought to amend the Green Wedge and Clyst Valley Regional Park allocations as a result of the aforementioned response. In addition, the Council appear to have overlooked the opportunity to allocate employment land to the south of the existing business park, subject to planning application 24/1356/FUL. For the avoidance of doubt, the land subject to this consultation response is outlined and stippled in red on the reproduced Development North of Topsham Policies Map, in Appendix 1 below. This land includes the approved business park (planning reference: 17/2357/MFUL) and the land subject to a retrospective planning application, for the change of use of land to B8 storage, (planning reference: 24/1356/FUL). Newcourt Barton is a well-established and successful business park which is operating at capacity on its permitted site. Newcourt Barton Business Park supports a significant number of small and medium sized businesses and as a result is a key employer in the local area. The area subject to the current application (planning reference: 24/1356/FUL) alone supports 17 businesses and employs 54 people. There is a huge demand for the small and affordable yard hannah@hcplanning.co.uk | 07817516943 | www.hcplanning.co.uk Company Registration Number: 14705897 areas available to rent and this need is not met elsewhere in the District. Therefore it is crucial that the site is recognised by the Local

Plan and protected as employment land. The green wedge designation under policy OL05 incorporates the approved business park within the allocation, it is considered entirely inappropriate for the business park to be included within the green wedge, the two uses are incompatible and given the established nature of the business park, such designation will impede any future re-development. It is unclear why the Council have included this developed land in the green wedge and it should be removed. My client also wishes to object to the extension of the Clyst Valley Regional Park (CVRP) policy WS09 to include land at Newcourt Barton Business Park. It is considered entirely inappropriate for land at Newcourt Barton, which is already in use for industrial purposes, to be included within the CVRP, as there is conflict between the CVRP policy objectives and the existing permitted and proposed uses across the Business Park, the loss of which would have severe implications for the local economy and established local businesses. It is requested that Newcourt Barton Business Park, as outlined and stippled in red on the map in Appendix 1, is removed from both the CVRP designation (policy WS09) and the green wedge (policy OL05). The removal of the site would not result in the fragmentation of these designations given the location of the site on the edge of the designated areas and would reinforce the purpose of these policies.

Full name: Chris Dadds

Organisation (where relevant): JLL

Other party name (if relevant): Charles Kislingbury on behalf of L Askew

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See below

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 Clyst Valley Regional Park is an area of green and blue infrastructure covering approximately 6,000 acres in the west of East Devon and to the north and east of the city of Exeter. Draft policy WS09 supports plans to deliver high quality, nature-rich public open spaces, improvements to water quality and to integrate and enhance green infrastructure provision. The draft Local Plan proposes an expansion of the Clyst Valley Regional Park further to that which is outlined in the adopted Development Plan. The adopted East Devon Local Plan (2016), included the following text within the supporting text for Strategy 10 (Green Infrastructure in East Devon's West End), when explaining the Clyst Valley Regional Park: "The Clyst Valley Regional Park proposal does not establish a 'policy boundary' that prevents or 'says no' to development. It sets out where particular emphasis will be attached to establishing high quality landscape and settings for development, people and wildlife". The above text, or similar, should be included in the supporting text of policy WS09 to make clear the nature, scope and intention of the Clyst Valley Regional Park, which is not a protectionist designation. Furthermore, the extent of the park, in the vicinity of Wares Farm, should be defined through the master planning process associated with the New Community. Currently, the extent of the designation does not appear to follow clearly defined boundaries on the ground and is therefore unclear as to its extent. The allocation of the land at Wares Farm for housing should include this land within the New

Community boundary, and thereafter masterplanning to support the delivery of the land should consider the suitable boundary of the Clyst Valley Regional Park. Criteria 'F' of policy WS09 outlines a series of quantitative targets which new development will be expected to contribute to or make proportionate contributions towards. It is not clear how these targets are to be proportionally divided on a site-by-site basis. As such, the wording "proportionate contributions" should be deleted from the policy wording as it is unclear. The final section of the policy reads "Where major development occurs outside of but close to the allocated park, we would wish to see all the above policy tests addressed and also green space provision associated with or required for the development should, where possible, be linked to and provide pedestrian and cycle access into the CVRP." The language used within the policy may lead to uncertainty in policy interpretation with regards to what constitutes a site being "close to the allocated park". This wording should either be deleted or clarified, in order to ensure a more precisely worded policy in line with The NPPF (16), so it is evident how a decision maker should react to development proposals. Plans and policies are required to be consistent with national policy in order to be found sound having regard to paragraph 36 of the NPPF.

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.: To ensure the Local Plan and policies contained within are found sound having regard to the NPPF.

Full name: Owen Jones

Organisation (where relevant): LRM Planning

Other party name (if relevant): David Wilson Homes

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: STRATEGIC POLICY WS09 – CLYST VALLEY REGIONAL PARK

9.7 Amongst other things, Policy WS09 of the emerging Plan requires all major development within or on land adjacent to the Clyst Valley Regional Park, either directly or through mitigation, to: (1) meet the Local Plan requirements for green and blue infrastructure; (2) provide connected cycling/walking infrastructure, including extensions or links to the Clyst Valley Regional Park; (3) restore and enhance the landscape character of the Clyst Valley; (4) reduce pressure on environmentally sensitive locations, including via SANG; (5) contribute to the excellent ecological status of the River Clyst and its tributaries; and (6) to contribute to, or make proportionate contributions to various Clyst Valley Regional Park targets. EAST DEVON LOCAL PLAN PUBLICATION DRAFT CONSULTATION 46

9.8 Whilst DWH are supportive of the existing strategically important Clyst Valley Regional Park and its proposals to enlarge it, they are concerned that as currently drafted, the emerging Policy is not, as required by para. 16 of the NPPF, clearly written and unambiguous. It is not consistent with national planning policy and is therefore unsound. Whilst it is clear that the Policy applies to all land that is proposed within the Park designation as defined on the Policies Map, it is not clear as to what is meant by “adjacent” in the context of the emerging Policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.:

9.9 In order to provide the necessary clarity, the Policy should only be applicable to land allocated as forming the Clyst Valley Regional Park on the Policies Map. Suggested changes “Development proposals within and adjacent to the CVRP will integrate Green Infrastructure and support the achievement of the objectives in the CVRP Management Plan. Any schemes that do not contribute to these objectives, or which would frustrate their implementation, will be refused planning permission.” And “All major development proposals within or on land adjacent to the Clyst Valley Regional Park will need, directly or through mitigation, to:” And “Where major development occurs outside of but close to the allocated park, we would wish to see all the above policy tests addressed and also green space provision associated with or required for the development should, where possible, be linked to and provide pedestrian and cycle access into the CVRP.”

4. Do you consider that this part of the Development at the West End 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:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Amongst other things, Policy WS09 of the emerging Plan requires all major development within or on land adjacent to the Clyst Valley Regional Park, either directly or through mitigation, to: (1) meet the Local Plan requirements for green and blue infrastructure; (2) provide connected cycling/walking infrastructure, including extensions or links to the Clyst Valley Regional Park; (3) restore and enhance the landscape character of the Clyst Valley; (4) reduce pressure on environmentally sensitive locations, including via SANG; (5) contribute to the excellent ecological status of the River Clyst and its tributaries; and (6) to contribute to, or make proportionate contributions to various Clyst Valley Regional Park targets.

Whilst the Cherwell Group are supportive of the existing strategically important Clyst Valley Regional Park and its proposals to enlarge it, they are concerned that as currently drafted, the emerging Policy is not, as required by para. 16 of the NPPF, clearly written and unambiguous. Whilst it is clear that the Policy applies to all land that is proposed within the Park designation as defined on the Policies Map, it is not clear as to what is meant by “adjacent” in the context of the emerging Policy.

In order to provide the necessary clarity, the Policy should only be applicable within the land allocated as forming the Clyst Valley Regional Park on the Policies Map.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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

“Development proposals within the CVRP will integrate Green Infrastructure and support the achievement of the objectives in the CVRP Management Plan. Any schemes that do not contribute to these objectives, or which would frustrate their implementation, will be refused planning permission.”

And

“All major development proposals within the Clyst Valley Regional Park will need, directly or through mitigation, to:”

And

“Where major development occurs outside of but close to the allocated park, green space provision associated with or required for the development should, where possible, be linked to and provide pedestrian and cycle access into the CVRP.”

4. Do you consider that this part of the Development at the West End 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: James McMurdo

Organisation (where relevant): McMurdo Land Planning and Development Ltd

Other party name (if relevant): Stuart Partners Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: [McMurdo Land Planning & Development Ltd on Behalf of Stuart Partners Ltd relating to Strategic Land at the “West End” of East Devon District made in the context of significant land holdings in this area. Representation to be read in conjunction with representations made by Turley on behalf of Stuart Partners Ltd and Bloor Homes Exeter on the proposed new and an expanded Hill Barton Business Park, and by Carney Sweeney on behalf of Stuart Partners Ltd and Down, relating to land being promoted for a village for up to 2,000 houses between Clyst St George and Clyst St Mary]

Object

Reasons: It would not be sound to prescribe Clyst Valley Regional Park boundaries based on a “Management Plan” that is not to be robustly examined in public as part of the Local Plan. (This applies to other documents referenced). (May not comply with CIL regulations)

The CVRP is supported as a concept (and our client group wants to help deliver it) but it is to be located in the only area in East Devon free from significant strategic development constraints and consequently it will have to compete with higher tier land uses, especially bearing in mind what we state on the DTC, meeting unmet housing and employment land need (including from Exeter), all meaning that its boundaries cannot yet be defined and robustly defended as part of policy making.

The reality is it should evolve over time, paid for largely by strategic development that it will serve.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 the policy so that the CVRP can be delivered as part of strategic development proposals at more intensive Masterplan stages, reviewed periodically.

Full name: Oliver Keates

Organisation (where relevant): OBK Land and Planning Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 broadly support this policy such as the provision of cycling/ walking infrastructure, where possible (my underlining). 30% tree canopy cover should be a target only to be achieved “where possible” because this level of tree canopy cover is, realistically, difficult to achieve on a lot of housing sites where the aim is to optimise density and design schemes which are compatible with the local character. Good and appropriate landscaping is the key rather than an arbitrary aim for tree canopy coverage of 30% which may provide difficult to achieve in practice.

4. Do you consider that this part of the Development at the West End 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)

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Strategic Policy WS09 (Clyst Valley Regional Park) identifies, and contains policy for, the Regional Park. As raised previously in response to the Regulation 18 consultation, whilst we recognise the benefits of the Clyst Valley Regional Park (CVRP) in providing connected multi-functional green infrastructure in the eastern edge of Exeter, the rationale for its review and extension of its boundaries is not clearly explained or justified within the consultation material. Nor are the implications of the revised boundaries set out in terms of the overall strategy of the emerging Local Plan, strategic growth or development opportunities.

The policy contains a range of requirements for major development within, or on land adjacent to the Regional Park. Whilst some of these requirements, like providing connections to the CVRP (requirement B), are reasonable and feasible, other requirements appear inappropriate.

We are particularly concerned that requirement F of the policy requires contributions to the CVRP targets, including habitat restoration, tree canopy cover, public open space meeting certain standards, and delivering cycle trails. This policy appears to introduce a requirement that goes beyond typical delivery requirements. The implications on the deliverability and viability of relevant allocations have not been tested or considered further within the evidence base. There is no evidence that the policy will therefore be effective.

There also remains a lack of clarity on the potential impact of the CVRP extensions on existing businesses, including farming enterprises within or adjacent to the revised boundaries and how this might impact upon those existing uses and activities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.:

Policy WS09 requires further evidence to demonstrate that the policy objectives of the CVRP are necessary and would not place unreasonable demands on development, leading to deliverability or viability issues. Without this further evidence the policy in its current form is unjustified and would be ineffective. It should be amended to reflect broad objectives to be encouraged rather than required or be deleted from the Plan.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Strategic Policy WS09 (Clyst Valley Regional Park) identifies, and contains policy for, the Regional Park. As raised previously in response to the Regulation 18 consultation, whilst we recognise the benefits of the Clyst Valley Regional Park (CVRP) in providing connected multi-functional green infrastructure in the eastern edge of Exeter, the rationale for its review and extension of its boundaries is not clearly explained or justified within the consultation material. Nor are the implications of the revised boundaries set out in terms of the overall strategy of the emerging Local Plan, strategic growth or development opportunities.

The policy contains a range of requirements for major development within, or on land adjacent to the Regional Park. Whilst some of these requirements, like providing connections to the CVRP (requirement B), are reasonable and feasible, other requirements appear inappropriate.

We are particularly concerned that requirement F of the policy requires contributions to the CVRP targets, including habitat restoration, tree canopy cover, public open space meeting certain standards, and delivering cycle trails. This policy appears to introduce a requirement that goes beyond typical delivery requirements. The implications on the deliverability and viability of relevant allocations have not been tested or considered further within the evidence base. There is no evidence that the policy will therefore be effective.

There also remains a lack of clarity on the potential impact of the CVRP extensions on existing businesses, including farming enterprises within or adjacent to the revised boundaries and how this might impact upon those existing uses and activities.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: MODIFICATIONS REQUIRED

Policy WS09 requires further evidence to demonstrate that the policy objectives of the CVRP are necessary and would not place unreasonable demands on development, leading to deliverability or viability issues. Without this further evidence the policy in its current form is unjustified and would be ineffective. It should be amended to reflect broad objectives to be encouraged rather than required or be deleted from the Plan.

Full name: Nick Matthews

Organisation (where relevant): Savills

Other party name (if relevant): Mac Mic Strategic Land

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Introduction

1. This representation is submitted by Savills on behalf of Mac Mic Strategic Land (from hereon referred to as 'Mac Mic'). Mac Mic is a strategic land promoter with a strong reputation for delivering planning permissions that lead to high-quality development.

2. Mac Mic has instructed Savills on their behalf to submit a series of representations to the relevant policies of the Regulation 19 Local Plan, including this policy. Policy WS09

3. It is our understanding that one of the primary functions of the Clyst Valley Regional Park (CVRP) is to act as a Suitable Alternative Natural Greenspace (SANG) which absorbs recreational pressure in acceptable locations physically divorced from European protected habitat with in East Devon. The CVRP is therefore in itself the SANG require to support development which would otherwise exacerbate existing recreational pressure.

4. It is therefore somewhat confusing to include a requirement in Strategic Policy WS09 for development proposals to open "reduce recreational pressure on environmentally sensitive locations, through the creation of accessible green space and where appropriate suitable alternative natural green space". Is it the Council's intention that the SANG required through Criterion D of this policy is in addition to or part of the proposed improvements to the CVRP? Greater clarity is needed to ensure that those promoting development and determining planning applications are fully cognisant of the policy requirements.

5. Furthermore, whilst Mac Mic support the principle of the CVRP and its enhancement through relevant development proposal, any contributions to works within the CVRP from major development must be compatible with Regulation 122 of the Community

Infrastructure Levy Regulations. With that in mind it is unclear how Criterion F of the policy will be applied in practice.

6. If for example a proposed development included all necessary open space within the proposed development to adhere to the Fields in Trust standards set out in Policy OS02, there would be no planning justification for a contribution towards the delivery of the CVRP targets.

7. Unless greater clarity is provided on the application of Criterion F, we consider it ought to be deleted from the draft policy wording.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.:

7. Unless greater clarity is provided on the application of Criterion F, we consider it ought to be deleted from the draft policy wording.

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: Nick Matthews

Organisation (where relevant): Savills

Other party name (if relevant): Mac Mic Strategic Land

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See attached.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 attached.

4. Do you consider that this part of the Development at the West End 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: Richard William Mulholland

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 green space, both the wedges and the Culme Valley Park around West Clyst needs to be maintained in its entirety, otherwise we will lose the special nature of the area (including it's bio diversity).

Your process does not make it easy to lodge such feedback in the right place, so it's included here for you to place appropriately.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: 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: Donna Crabtree

Organisation (where relevant): National Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: In the National Trust response to the Reg 18 consultation we set out the importance of the National Trust Killerton Estate as a significant green resource close to the city of Exeter, and the most popular National Trust house and garden in Devon. We highlighted the direct and cumulative impacts significant population increases from Cranbrook, the planned new community east of Exeter as set out in Policy WS01 of the emerging Local Plan, and other proposed housing allocations within the district, has on visitor numbers to the Killerton Estate. The National Trust is already a significant landowner within Clyst Valley Regional Park (CVRP) boundaries; the visitor offer at the Killerton Estate is therefore vital to provide greenspace for this increasing population. The National Trust is supportive of the objectives as set out within this policy which seeks to ensure that development proposals within and adjacent to the CVRP will support the objectives in the CVRP Masterplan (wording in the policy needs to be updated from ‘Management Plan’ to ‘Masterplan’ to reflect the document title). The National Trust notes that the policy seeks to ensure that major development within or on land adjacent to the CVRP will contribute to criteria A-E and make proportionate contributions to targets 1-4. The CVRP Masterplan itself was approved in 2021, and will need to be reviewed within the emerging Local Plan period 2020-2042. Given that Strategic Policy WS09 supports development proposals within and adjacent to the CVRP providing the objectives of the CVRP Masterplan are met, it is suggested that further details are stated in the supporting text which sets out the process and timescales for review of the Masterplan. The supporting text (para 4.40) states that a large portion of the park is within the National Trust’s Killerton Estate. Given the role of the National Trust as a significant landowner, we request that consideration is given to the importance of the Killerton Estate and how it’s role in delivering the CRVP objectives can be reflected in the supporting text. The National Trust would welcome discussions with East Devon District Council regarding further extensions to the CVRP boundaries to incorporate additional areas of the 2600-hectare Killerton Estate prior to adoption of the emerging Local Plan. Criteria B) of policy 16 concerns connected cycling and walking infrastructure, including

the Clyst Valley Trail, and F.4. states that proportionate targets should be made towards 80km of traffic-free trail and quiet way. The National Trust support this policy criteria but are also keen to support connections between Killerton and Cranbrook which are currently constrained by railway infrastructure. This policy provides an opportunity to reference ambitions to provide these connections given the CVRPs role in ensuring Cranbrook and other developments are provided with large scale, high quality greenspace. As stated in our previous responses to the emerging Local Plan, given the importance of the Clyst Valley Regional Park in providing Green Infrastructure for residents of East Devon, the National Trust consider the potential for a pedestrian / cycle railway crossing near the new Cranbrook Station would be key to connecting Cranbrook with the Killerton Estate and the wider Regional Park. Therefore, the National Trust would welcome further consideration of the potential for a pedestrian / cycle railway crossing near the new Cranbrook Station. The National Trust remains keen to work with partners to provide improved sustainable travel links within the Killerton Estate, and connecting with new and existing communities, including those in Exeter and East Devon. Developing ideas in partnership with East Devon District Council, Devon County Council and Exeter City Council to develop quiet-lane, traffic-free networks and multi-use trails, and addressing constraints to providing connections, would ensure the greatest benefit to the public. Criteria 4 of this policy refers to cycling and walking opportunities meeting design standards. It would be useful here to cross reference the Countywide Local Cycling and Walking Infrastructure Plan. Para 4.43 of the supporting text states that delivering park objectives relies on partnerships across public, private, and charitable sectors, with funding from diverse sources, including Community Infrastructure Levy and Section 106 obligations. As a significant landowner and key stakeholder of the Clyst Valley Regional Park, the National Trust is keen to be involved in future discussions, including overcoming connections constrained by rail infrastructure and further extension of the Clyst Valley Regional Park boundary to include a wider area of the Killerton Estate. It would be beneficial if further detail could be provided through the Local Plan to quantify the cost and sources of funding, to provide clarity over delivery mechanisms, delivery timescales and the level of contributions to be required from developers.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The Clyst Valley Country Park (CVRP) is already afforded protection under Strategic Policy WS09 in the draft East Devon Local Plan, which states that development proposals within and adjacent to the CVRP must integrate green infrastructure and contribute to the park's objectives. Any schemes that do not support these objectives, or which frustrate their implementation, will be refused planning permission.

While the draft Local Plan acknowledges the significance of the Clyst Valley Country Park, explicit prohibitions, enhanced biodiversity requirements, and formal landscape protections would provide stronger assurances against inappropriate development. These measures would ensure the CVRP continues to be a vital environmental and recreational asset for the community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: However, the policy could be strengthened in the following ways to provide more robust protection against inappropriate development:

6.1. Explicit Prohibition of Development

- Currently, WS09 requires development to contribute positively to the CVRP's objectives but does not impose an outright prohibition on certain types of development.

- A clearer presumption against major built development (except essential park-related infrastructure) should be introduced.

6.2. Stronger Landscape and Ecological Protection

- The policy could explicitly state that any development within the CVRP must demonstrate no net loss of biodiversity and comply with the Nature Recovery Network objectives.
- A requirement to deliver a Biodiversity Net Gain (BNG) of at least 20%, exceeding national minimums, would further deter speculative development.

6.3. Additional Planning Constraints

- The CVRP policy could mirror protections given to Areas of Outstanding Natural Beauty (AONBs), requiring a stricter planning test for development.
- Introduce a Strategic Visual Impact Assessment requirement for any new proposals to ensure landscape character is preserved.

6.4. Expansion of the Green Wedge Concept

- Linking the CVRP protections with Strategic Policy OL05: Green Wedges would prevent coalescence between settlements and further limit development pressures.

6.5. Formal Designation as a Protected Landscape

- Lobbying for the CVRP to be designated as a Local Green Space under the National Planning Policy Framework (NPPF) would provide statutory protection similar to Green Belt land.

6.6. Stronger Flood and Water Protection Measures

- The policy should require developments to:
 - o Avoid areas at risk of flooding within the CVRP.
 - o Improve natural flood defences and soil health.
 - o Contribute to natural flood management rather than rely on built infrastructure.

6.7. Align with the Broadclyst Neighbourhood Plan

- The Broadclyst Neighbourhood Plan supports the CVRP by ensuring development in the area is low-impact and environmentally sensitive.
- Strengthening the local plan to explicitly defer to more restrictive neighbourhood plan policies where applicable would add an additional safeguard.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: Clyst Valley Regional Park Expansion (Strategic Policy WS09)

- The Local Plan supports the expansion of the Clyst Valley Regional Park, creating new public green spaces and improving wildlife connectivity.
- Broadclyst aligns with this through the designation of Local Green Spaces (NE6), ensuring permanent protection from development.

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

- Ignores annual increase in flooding and current sewage problems The aim of this policy is laudable and talks about needing to contribute to the development of the plan for the park but does not address the issue that will affect it most – sewage outflows. Without a completely new approach to the provision of the sewage treatment works the CVRP will be an open cesspit as the infrastructure continues to fail.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: It is disappointing that the reference to carbon sequestration has been removed from this policy and the direct reference to climate resilience and protection of irreplaceable habitats. In the text, under point F.4, there is no clarity around what would be defined as 'close to' the CVRP which would provide certainty for developers over which policy tests the proposals may be subject to.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The boundary of the Clyst Valley Regional Park contains many designated and non-designated heritage assets, including extensive areas of historic parkland. We note that specific policy criteria relating to heritage have been removed since the Draft Plan. However, we acknowledge that the first paragraph of Policy WS09 requires development to support the objectives of the CVRP Management Plan. A minor adjustment is needed to clarify whether this refers to the 25 year masterplan, which itself contains a broad objective relating to heritage? With this in mind, it would also be helpful if the objectives of the masterplan were listed in supporting text, to ensure it is understood that green infrastructure is a broad concept which, in the context of Clyst Valley Regional Park, will focus on eight defined objectives.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Adjust policy: “Development proposals within and adjacent to the CVRP will integrate Green Infrastructure and support the achievement of the objectives in the CVRP 25 Year Masterplan Management Plan.” Supporting text paragraph 4.39: “A 25-year masterplan for the Regional Park, approved by EDDC in February 2021, won the 2021 RTPi South West Award for Planning Excellence and was a finalist in the national RTPi awards 2022. The objectives contained in the masterplan come under the eight headings of: people, education, nature, climate, water and soil,

WS10

Full name: Andrew McKeon

Organisation (where relevant): EXETER CIVIC SOCIETY

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Exeter Civic Society objects to the proposed allocation of land for a new community in East Devon and at Exmouth and Topsham on the grounds that the implications for the road network and infrastructure development have not been properly considered and the plan is therefore unsound in respect of these proposals. We are making this objection because of the levels of the current levels of congestion on roads in Exeter at peak times, and the increasing number of vehicles on the Strategic Road Network around the city. In addition, it is clear from current traffic movements that there is already a significant increase in traffic leaving and returning to the city at peak times to workplaces outside of the city; possibly at Skypark, Hill Barton and Greendale Industrial Parks. We expect this trend to continue. It is unsound because: The assessment of transport impacts was modelled on a previous draft plan. The updated modelling in December 2024 noted that the final plan may be different. It is indeed, with increases of 25% for the new town albeit over a longer timescale and of 30% for Exmouth. These will have a significant impact and should be modelled and considered before the plan is finalised and considered sound. The updated December 2024 modelling notes: 'In 2040 many of the junctions in Exeter show an increased V/C ratio due to higher traffic flows on the network. There are some junctions which were already over-capacity in 2017 and/or 2030 and remain so in the future years, but others which were below capacity and now have at least one turn that is over-capacity. For example, several SRN junctions between the A30 airport junction, M5 J29 and M5 J30 had worst turn V/C ratios below 95% in 2030 that go over 95% in 2040. Junctions that were already over-capacity in 2030 and get

worse in 2040 include Clyst St Mary roundabout, Clyst St George roundabout, and the A38 northbound approach to M5 J31.' The further housing development proposed will exacerbate this but no assessment has been made. Prime access to the North of Topsham site will be along Clyst Road. This is a narrow road with a traffic light controlled junction to the A376 near to J30 of the M5. The plan suggests making a cycle route and/or a bus route along it but the feasibility and cost of doing so needs to be assessed first before the allocation can be made as local knowledge suggests the likelihood of doing so is negligible. Strategic Policy WS10 proposes that EDDC and Exeter City Council will work jointly on infrastructure and traffic mitigation matters, specifically in relation to the M5 J 30 roundabout. It is not clear whether this includes the Clyst Road/A376 junction, but that should specifically be referenced and included in the policy. Also, there is no reference to changes to the junction in the Infrastructure Delivery Plan. They need to be included as Priority 1. The A376 from Exmouth to Exeter is known to be heavily congested at peak times - a point made by Devon County Council in earlier consultations. This has been omitted from the S19 version of the plan but is even more relevant given the extra housing proposed. There is little practical prospect of a bus priority route, given the nature of the A376 from the town to the M5 and Exeter, passing through many villages including the congested roads within Topsham. There are no proposals to improve the railway line other than enhancements to specific stations. Devon County Council's November 2020 Exeter Transport Strategy is now over five years old and is half way through. It cannot be considered reliable evidence at this point without updating and going further to 2035 or beyond. A number of the schemes listed as completed by March 2025 have been significantly reduced in scope because of public objections, so their likely impact is much reduced. Given the track record in significantly modifying and reducing the impact of such schemes in light of public opinion, the proposed future schemes and their mitigating effect need to be reassessed for the plan to be sound. The November 2020 Transport Strategy notes that much of the impact of additional traffic in and on Exeter has been effectively absorbed by Exeter residents changing their travel habits (Para 3.3). There is diminishing scope for this. 80% of commuting journeys from towns outside Exeter are by car, from rural areas it is 90%. It also notes that 'existing (i.e. 2020) transport networks [are] already at capacity in peak periods' (Para 3.20) It notes but makes no specific assessment of the impact of Cranbrook, other than that it will grow to the size of Tiverton, and its highways will become congested. Better quantification of travel habits and impact of Cranbrook residents would better inform the S19 Plan and its soundness. The proposed new town (and to a lesser extent the other housing developments down the Exe Estuary and including Exmouth) might reasonably be expected to have similar impacts to Cranbrook. The empirical data informing the strategy is also over 7 years old and indeed makes use of the 2011 census which has been superseded by the 2021 census. It is therefore unreliable and unsound to base a plan on such out-of-date data. The impact of Cranbrook and of the proposed developments on Exeter to be reassessed using more

up-to-date data before the plan is approved. The Infrastructure Delivery Plan includes significant rail developments to make EDDC's S19 plan workable in respect of sustainable travel and its likely impact on the road network and Exeter. However, there are no costings or commitment from Network Rail. It is unclear where these proposed developments stand and whether they now feature in Network Rail's business plans. This needs to be clarified positively before the plan can be considered sound. The WSP Mitigation Modelling dated 9 December 2024 cites the possibility of four P&R sites, and whilst that at Peamore has planning approval, those at Markham and EDNC North and EDNC South have not been consulted upon. Indeed, the proposal by the highway authority for a P&R site at the A30 Ide interchange has previously been proposed by them but did not succeed because of public objection and an inability to demonstrate that a bus link would be effective on the already congested Alphington Road. As for the two proposed in East Devon, the EDNC South site is unlikely to be effective at peak times because the A3052 and Clyst St Mary roundabout are already congested. Although improvements for the highway at the A3052/A376 roundabout is highlighted in chapter 11 of The Plan, the Infrastructure Delivery Plan does not include any works to improve this route to the M5/Exeter. The Infrastructure Delivery Plan also includes significant development by South West Water (SWW) on a new sewage treatment plant for the new town and development of the one at Countess Wear. Since the IDP was prepared Ofwat has determined a significantly lower price increase to support SWW's business plan than the company sought. The continued inclusion of these items in SWW's business plan needs to be settled before EDDC's own plan and the allocations it provides can be approved.

4. Do you consider that this part of the Development at the West End 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.: The traffic and transport consequences of the proposed developments at the West End are very significant, have been inadequately considered and deserve further analysis and assessment.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: For consistency, in relation to education, this policy should only refer to infrastructure requirements. The requirement to mitigate the impacts on home to school transport is covered in paragraph 3.44 (page 44). DCC requests the following changes to the first list in policy WS10 as shown below: “C. 1.8 hectares of land safeguarded for education purposes to provide the option for primary education infrastructure on site. Additional education provision for early years, primary, secondary and pupils with special education needs and disabilities is required to support this development; and”

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Vistry object to the allocation identified as “development next to the M5 and north of Topsham”, set out within Strategic Policy WS10. The policy is not justified and is unsound.

Within EDDC’s Regulation 18 Additional Consultation, the Site was identified as being located within a Green Wedge. Vistry responded to that consultation confirming that they had significant concerns regarding the impact of the draft allocation on the purpose and functionality of the Green Wedge designation within which it was then located. It is noted that the proposals map has since inset the Site within Green Wedge designation. EDDC revised the Green Wedge designation to exclude areas covered by Strategic Policy WS10, effectively adjusting the boundaries to leave out site proposed for housing. This adjustment compromises the integrity of the original Green Wedge identification process. The inclusion of a site within a Green Wedge signifies that its development would lead to settlement coalescence. Consequently, such sites should not be deemed suitable for development and should have been assessed appropriately in the Council’s HELAA site suitability assessment.

This development of this site would introduce inappropriate built form to the area, as it is situated between Topsham and Clyst St Mary, not directly adjoining either settlement. This would result in sporadic, isolated development that contributes to settlements coalescence. Although separated by the M5, the allocation would appear as an extension to the southeast of Exeter and the nearby settlement of Newcourt.

It is noted that the Site extends across multiple land ownerships and the policy requires a masterplan prior to enabling any specific parcels of land to come forward for

development. This masterplan will also require cross-boundary working with Exeter City Council and will require the development to consider the infrastructure needs across both authority areas.

The Site's HELAA (2022) assessment also notes that the Site is located within Grade 1 agricultural land, and therefore the allocation does not comply with draft LP Policy OL10.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Vistry consider there to be suitable

alternative sites outside of the existing Green Wedge and within areas of lower agricultural land quality, located on strategic network routes that require less infrastructure improvements that can deliver housing at a similar scale to Land North of Topsham without compromising the purpose and function of other policies, including Land at Addlepool Farm.

Addlepool Farm is owned by a single landowner, and is within the control of Vistry, a national housebuilder, who have the expertise and reputation to deliver a sustainable scheme that can make a meaningful contribution to EDDC's housing land supply in the short to medium term. Unlike this draft allocation at north Topsham, Addlepool Farm is not located within a Green Wedge and its development would not compromise the coalescence of settlements.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The allocation of the urban extension to the north of Topsham for mixed use development is supported. From a sustainability perspective, we would agree that an urban extension to Exeter and Topsham, and the access to the wide range of services and facilities that the City provides, is one of the most sustainable options for the Local Plan in delivering strategic planned growth.

Whilst we agree master planning will be an important element in ensuring development can come forward in a comprehensive and planned way we do consider the proposed wording of the policy is too negative in respect of release of individual sites. The site has already been the subject of framework master planning and visioning and being identified as a single strategic allocation will provide a further framework for decision-making in respect of key delivery and infrastructure matters.

However, the policy is worded in a way that would appear to require all unknowns and uncertainties to have been fully addressed prior to any part of the site being considered, including relying on the Council and Exeter City Council to have collaborated over a Delivery Framework. This all points to the potential for significant delay and the lack of delivery. It should also be noted that phases 1 and 2 of the Taylor Wimpey scheme at Clyst Road within the Exeter City administrative boundary is either complete or committed and therefore Exeter's interest and the need for collaboration would appear to be very limited.

It is important for overall Plan resilience, that whilst masterplanning will be required, development should be able to proceed in phases where it is demonstrated that it would not prejudice the delivery of the wider site (for example, by ensuring proper connections are made to land ownership boundaries and making appropriate contributions to infrastructure etc).

Indeed, it is often the planning application process that provides the certainty regarding the likely final form of development (including quantity, land uses, and S106 obligations) and therefore assists in establishing the apportionment of costs and infrastructure requirements through collaboration agreements between developers.

Therefore, any masterplanning and delivery framework will need to be undertaken in conjunction with the site promoters and be proportionate. It should aim to provide high level principles to aid a phased approach rather than rule out flexibility that is often key to the delivery of a strategic allocation.

There are clear benefits to this approach in that it enables elements of the allocation to be delivered as early phases to support Plan resilience and early housing delivery. It will begin to establish key principles and a direction of travel for the remainder of the allocation as well building confidence in the Plan strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: As set out above we are supportive of Policy WS10 but are concerned as currently written it does rule out a more phased and flexible approach and early delivery.

Allowing a phased approach within the parameters of a strategic allocation will not prejudice the delivery of the wider scheme and is likely to be beneficial in the long term, in bringing development forward earlier. Therefore, the allocation should be modified to not rule such a release out in principle as the current wording suggests.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The allocation of the urban extension to the north of Topsham for mixed use development is supported. From a sustainability perspective, we would agree that an urban extension to Exeter and Topsham, and the access to the wide range of services and facilities that the City provides, is one of the most sustainable options for the Local Plan in delivering strategic planned growth.

Whilst we agree master planning will be an important element in ensuring development can come forward in a comprehensive and planned way we do consider the proposed wording of the policy is too negative in respect of release of individual sites.

Our client's site at Land at Clyst Road forms the southern most element of the allocation, although it also has a strong relationship with the adjoining consented sites to the west and forms the next logical phase of the development currently being built out. It represents a relatively small element of the land allocated at north Topsham and the delivery of that wider strategic allocation is not dependent on it. In these circumstances there is no reason why that site could not come forward as an early phase, provided it demonstrates it will not prejudice the delivery of the wider area. A Framework masterplan has previously been provided to the Council that demonstrates that would not be the case.

There are clear benefits to this approach in that it enables elements of the allocation to be delivered as early phases to support Plan resilience and early housing delivery. It will begin to establish key principles and a direction of travel for the remainder of the allocation as well as building confidence in the Plan strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: MODIFICATIONS REQUIRED

As set out above we are generally supportive of Policy WS10 but are concerned as currently written it does rule out a more phased and flexible approach and early delivery. The allocation should be modified to not rule out individual site release as a matter of principle. Instead wording requiring individual elements to demonstrate that they would not prejudice the delivery of the wider area would be more appropriate.

Full name: Linda Bartlett

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Re the draft publication of the draft of East Devon Local Plan, as a resident of Clyst Road, Topsham, I am concerned about proposals for development in this area.

I believe that the scale of proposed development here is excessive, and will destroy the character of Topsham.

Residents of new developments around Topsham would have no access to the town by public transport, and hence will need to drive into the town, which just does not have facilities for more traffic.

There have been many new recent residential developments in the Topsham area, adding to this huge traffic problem, and also resulting in excessive pressures on local school and doctor's surgery.

I would be extremely concerned if any of the green areas on the East side of Clyst Road are included for proposed development, and I hope these will be preserved as fields, green wedges, or part of the Clyst Valley Park.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 suggest that perhaps the whole of Clyst Road could be designated as a cycle lane, as it has in the southern part by Highfield, and traffic diverted through any new estates. This would discourage drivers from using it as a rat run, and hence ease congestion at Elm Grove Road and Denver Road.

Full name: Karime Hassan MBE

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End 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]

The consideration set out above [see respondent response to Policy WS01 and full uploaded representation] in relation to the timely delivery of infrastructure equally applies to Strategic Policies WS10: Development next to the M5 and north of Topsham. It is also the case in relation to that policy that a master plan will need to be developed in conjunction with joint work between Exeter City Council and East Devon District Council on a formal Development and Infrastructure Delivery Framework. This requirement is supported.

Full name: Adrian Holloway

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

There has been little publicity in Topsham about the suggested developments of WS10 and WS15, with many residents completely unaware of what is being proposed in Topsham. Communication did appear to have taken place in East Devon. As those facing the disruption, and quality of life, Topsham people are entitled to have long term impacts properly presented in order for them to comment. There appears to be a perception among some living locally (in Topsham) that the Exeter Local Plan, consulted on three months ago was the main document outlining future large scale, generational development.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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.: reconsult, or extend the consultation, this time promoting the consultation to topsham residents also.

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: WS15

Development so far at darts farm appears to be about creating an exclusive enclave for an affluent few, while imposing an insensitive visual disturbance for local resident and for nature. I cant imagine that new development will be any less insensitive. Running illuminations throughout the night building scale buildings and car parking in green field sites, adjacent to ecologically sensitive areas does not offer a sustainable future resource

WS10 The character of topsham has already been changed forever by insensitive and greedy development. If development must go ahead in this area, to at least preserve some of the character of the traditional Devon landscape by keeping development to the west of clyst road not to the east of clyst road (where the river clyst is). Clyst lane itself is an important wildlife corridor and feature of the historic landscape. Its unsympathetic modification of this route will further erode the traditional character of Topsham and the surrounding area. Please preserve clyst lane and if development must be build, divert the trafficked road through the development, so that the developers who stand to make the profit can bear the cost and effort of creating suitable infrastructure.

W10

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Avoid further development of darts farm and preserve the landscape in that location

Preserve Clyst Lane and its historic feel.

Do not develop east of clyst lane.

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: Liesbeth Kop

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

Lack of Public Awareness: The proposal has not been adequately communicated to the residents of Topsham, who are the most affected by this development. Despite the significant impact on the Topsham area, there has been no distribution of leaflets, no social media advertising, and no other forms of public notification. This is evidenced by the fact that the chapter on 'local towns and villages' contains all the development in the East Devon Towns, whilst the development affecting Topsham Town, is hidden under the chapter 'West End chapter'. This is misleading, and ambiguous to most people. It is evident from the low response rate: ie. 56 comments as opposed to more than 1300 comments on the 'towns and villages' chapter. When the Apsham Grange development in Topsham came forward, more than 1500 people objected to it. This time only 56 comments have been received. That suggests inadequate consultation. Insufficient Consultation: Many residents in Topsham are unaware of the proposals. This lack of awareness is particularly concerning given that the Exeter Local Plan has recently undergone consultation. Residents may mistakenly believe their involvement in the consultation process is complete, without realising the specific implications for Topsham. Obliviousness to Proposals: The general obliviousness among Topsham residents regarding the development proposals indicates a failure in the communication strategy. Effective public consultation requires that all affected parties are informed and given the opportunity to voice their opinions. The local plan fails to meet legal compliance due to inadequate public awareness and consultation efforts.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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 urge the planning authority to repeat the engagement of the proposals in and around Topsham to ensure proper communication and engagement with the residents of Topsham before proceeding with any development.

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As a resident of Topsham, I strongly object to the proposal to develop the land between the Blue Ball pub and Topsham for the following reasons:

1. Overloading Local Amenities and Services:

- Topsham Surgery: The surgery is already oversubscribed, as confirmed by the Devon NHS submission. There is no indication of how this issue will be addressed.
- Topsham Primary School: The school is at capacity due to increased demand from recent developments at Rydon Lane and Exeter Road. Ongoing developments in Newcourt Road and Clyst Road have further strained resources. The County Council has not provided any plans to mitigate this issue or address how parents and children from the new development will travel to and from school.

2. Increased Traffic Levels and Related Emissions:

- The proposed development is over 2km from Topsham train station, with no indication that bus routes will be diverted to serve the area. Current government advice discourages reliance on car use for new developments. However, it is clear that most residents will depend on cars for shopping, leisure, and commuting.
- Traffic Congestion: The roundabout at Clyst St Mary is already at or over capacity, and the Sandy Park junction is operating near full capacity. Without real mitigation measures, these areas will become oversaturated. Denver Road and Elm Grove Road are narrow with poor pedestrian and cycling facilities, and further development will exacerbate congestion.

3. Lack of Measures to Promote Sustainability:

- The proposed developments are too far from Topsham, the train station and facilities to meaningfully encourage people to cycle or walk to the local amenities. Therefore, the 600 proposed houses will increase traffic massively to the local network which is already heavily constrained

4. Negative Impact on Quality of Life for Local Residents and Wildlife:

- Recent developments on Clyst Road and Newcourt Road have irrevocably changed the character of this part of Devon, disregarding its semi-rural nature. The Taylor Wimpy development has ignored DCC guidance on streetlighting, adopting high-level streetlights and illuminated bollards that cause light pollution and disrupt wildlife.

- Devon Wildlife Trust has stated that the original wildlife assessment by the developer was insufficient. The developer's claim that dormice present at the site do not require special protection is contradicted by Devon Wildlife Trust, which suggests the proposal fails to meet national and local authority planning requirements for a 10% net gain in biodiversity. The latest NPPF guidance of 2025 emphasizes the importance of minimising impacts on biodiversity and providing net gains where possible.

- Buzzards, badgers, deer, green and great spotted woodpeckers live in this area and frequently seen, amongst a whole other host of wildlife, this development will be to their detriment as their habitats will be lost. For all these reasons, I urge you to reconsider this aspect local plan. Please do not put further strain on the wildlife and network in this area. The proposals have not been properly considered by the community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: If development must come forward, at minimum, do not propose developments on the eastern side of Clyst Road. Consider converting the existing Clyst Lane into a cycle path and wildlife corridor, similar to the approach taken at Apsham Grange where Clyst Road has been closed to through traffic, and main traffic diverted through the new estate. This will at least minimise the impact, and allow people with an attractive alternative option to sustainable travel to and from Exeter.

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: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Whilst we appreciate that a masterplan is yet to be produced for this site, we would like to see the inclusion of targets for the creation of local natural habitats included within this policy, in line with the figures provided for new homes and employment land.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: ‘Supporting infrastructure, green spaces...’ should be replaced with ‘delivery of high quality green infrastructure’.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Whilst there is no reference to the presence of flood zone 2 and 3 on site, the policy highlights that a masterplan will be needed. We would support this approach as long as the masterplan takes account of the flood zone, and wherever possible avoids development within the areas at risk. The 'delivery framework' lists us, and other statutory bodies. It would be helpful for your authority to clarify what the LPA's expectations are on this matter.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As site WS10 is contiguous with WS12 we request similar text in relation to the setting of Clyst St Mary Bridge.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Additional policy text: “Towards the north of the site development should conserve the setting of Clyst St Mary Bridge, which is a Scheduled Monument.”

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: 39. It is noted that development next to the M5 and north of Topsham would be supported by an agreed masterplan for the whole site and a Development and Infrastructure Delivery Framework to be produced jointly by East Devon District Council and Exeter City Council. 40. The commitment to cross-boundary planning of future infrastructure requirements is welcomed by National Highways. Given the allocation appears to bound the M5 motorway, National Highways would wish to be a partner to the Delivery Framework and would recommend that additional policy wording is included to ensure the safety and integrity of the M5 is appropriately considered as part of future development. 41. Strategic Policy WS10 goes on to advise that “Through a transport assessment the traffic impacts of development of the site will need to be assessed in conjunction with the cumulative impacts that will also arise from development of the new community, and other new developments. Mitigation measures will need to be designed and agreed, to come forward in parallel with or prior to development to address adverse impacts, specifically including in respect of the M5 J30 (Sandygate Roundabout) and Clsyt St Mary Roundabout”. 42. National Highways recommend that this work should be completed prior to examination/ adoption of the plan so that the cumulative infrastructure needs of the area are appropriately understood and planned for.

Full name: Neil Butler

Organisation (where relevant): Natural England

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Strategic Policy WS10 Development next to the M5 and north of Topsham This site is adjacent to a large portion of Priority Habitat Coastal and floodplain grazing marshes along the eastern edge of the site, across the Clyst Road. This area is also a County Wildlife Site. Given the large extent of this adjacent habitat and the size of the proposed development, the policy could be improved by requiring the delivery of onsite habitats that reflect and link into this priority habitat.

Full name: Lucy White

Organisation (where relevant): Lucy White Planning Limited

Other party name (if relevant): National Grid Electricity Distribution (South West) Plc (NGED)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: THE EAST DEVON PRE-SUBMISSION LOCAL PLAN (FEBRUARY 2025) REPRESENTATIONS ON BEHALF OF NATIONAL GRID ELECTRICITY DISTRIBUTION (SOUTH WEST) PLC These representations are prepared on behalf of National Grid Electricity Distribution (South West) Plc (NGED) (formerly Western Power Distribution (South West) Plc, in response to the Regulation 19 East Devon Local Plan which is subject to public consultation. Introduction NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers. In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons. Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm: a) whether the lines can be accommodated within the development site; or b) the viability and feasibility of diverting and/or undergrounding overhead lines. This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy. In allocating land affected by high voltage power lines, the LPA should

take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. NGED cannot be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with NGED prior to the adoption of the Local Plan. In light of the above, NGED does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:

1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.
2. Early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;
3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.
4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 employment and housing allocation for 596 homes and 2.4 hectares of employment plus community facilities is intersected by the 132kV overhead electricity line to the south of the allocation site. The allocation policy makes no reference to the overhead line or the need to safeguard the line, retaining it in situ throughout the development. NGED welcomes the policy requirement for an agreed masterplan to be established for the whole site before any development parcels can be brought forward for development. To ensure the effectiveness of the policy to safeguard electricity infrastructure through this masterplan, specific reference should be made to the need to retain the infrastructure in situ. NGED reserves the right to comment further on the policy for the new

community through the second phase of the Regulation 19 consultation. For accuracy, please refer to NGED as National Grid Electricity Distribution throughout the Local Plan documentation. The organisation is no longer referred to as Western Power Distribution. I trust you find the above comments helpful and constructive. NGED would be willing to meet with Officers to discuss the proposals for the new settlement in further detail if that would be helpful. If you would like to arrange a meeting, please contact me to discuss further.

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: Lucy White

Organisation (where relevant): Lucy White Planning Limited

Other party name (if relevant): National Grid Electricity Distribution (South West) Plc (NGED)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See attached representation letter.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 attached representation letter.

4. Do you consider that this part of the Development at the West End 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)

WS11

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Devon County Council objects to allocation Brcl_26 until further archaeological work is undertaken. Before site Brcl_26 at Langaton Lane is allocated in Policy WS11, further archaeological work is required to understand the archaeological resource to determine the suitability of this site for future development as there is a concentration of regionally significant Neolithic funerary and settlement activity. The County Historic Environment Team is able to provide detailed advice on the extent and scope of the archaeological works required in order to determine the suitability of the site for allocation for development.

Full name: Fran Aggleton

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: I would like to question the ethics of the council when publishing this policy under the heading 'West End'. 'West End' is not the name of the area. The name of the area on my postal address is Tithebarn. 'West End' is not listed on the Ordinance Survey map, Google Maps or any other maps except the scribbled area of the PDF on this site. 'West End' is not the name of the Parish. All other areas listed in this consultation are listed under a recognisable name, and this one is not. Many people locally believe that the area in question is actually part of Pinhoe and are unaware this area is even part of East Devon's remit. I believe this will mean that this consultation will not actually reach an appropriate number of people living in Pinhoe, Monkerton or Tithebarn. I have also heard that the decision making team within EDDC likes to abbreviate West End of East Devon to WEEDs. Which is derogatory and disrespectful to everyone of the people living here. There are currently over 1000 properties in Tithebarn and I do not believe they are being considered equitably compared to other areas of the district. This is evidenced in the lack of resources provided to the area, from provision waste and dog bins, road signage and street cleaning to schools and indoor community spaces.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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.: See previous comments with regard to naming the area 'West end'

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: See my previous comments with regard to naming the area ‘West end’

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See my previous comments with regard to naming the area ‘west end’

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 my previous comments with regard to naming the area ‘west end’

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.: See my previous comments. EDDC has a systematic inequality in its approach in its duty of care compared to the rest of the District

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See my previous comments

Full name: Jane and Christopher Bingham

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: The following are concerns regarding the proposed Travellers' Site, Langaton Lane/Tithebarn: Is this site appropriate as the majority of the site is on a flood plain? The site opposite was opposed for houses due to the noise and proximity of the motorway. Travellers' Sites should comply with the same rules as for house building. The lane approaching site often floods. Travellers who use these sites often want a long-term placement for their children. All the schools in the catchment area are full. This would involve travelling to Exeter unless schools are required to save space for Travellers' children. Does this disadvantage the non-traveller community or do schools go above their allocation? How would this impact on the huge number of youngsters coming into the area with all the house building which is taking place? I understand that all children must have access to education but with this area inundated with youngsters what plan are being formed to deal with the influx? There is a shortage of spaces for Travellers in this area. Cannot a larger site be created in the new plan between the A30 and Topsham? If this proposed site goes ahead will the £600,000 which was set aside by East Devon for said site be used to place a manager on site to monitor the usage and maintenance? What about the Sowton site? The lane has been virtually traffic-free for a few years and is used by many pedestrians, cyclists, young children on scooters and bikes and with the increased traffic, if the proposed site goes ahead, what safety measures would be put in place to guarantee safe walking, cycling, etc. The corner at the top of the lane from the main road would need straightening in order for walkers coming from the Monkerton side to see traffic turning into the lane.

Full name: Emma Clarke

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please note that this response has been edited to remove content that did not comply with the obligations under the Equalities Act 2010

I feel like the Old piggery site is unsuitable for the following reasons...

- Lack of school places and there's already too much pressure on the schools, doctors, dentists, healthcare services i.e the pharmacies. I personally needed a doctor's appointment the other day and I had to wait 4 weeks for an appointment. On a separate medical issue I have been waiting 1.5 years for a referral from my doctors to see someone at the hospital.

- Protection of the country park - the country park bins are already overflowing at all times and do not get emptied regularly therefore there is rubbish and dog poop bags left on top of the bins and around the bin which is unsanitary and unsightly.

- Protection of wildlife in the country park

- The Old piggery site is in proximity to flood zone 3 which with climate change will only get worse and the site is on a flood zone

- Safety and security of the scouts

- Welfare and security of the residents that moved to this area at the point when there was no plans for a traveller site

- Risk of environmental damage and fly tipping

- Noise levels with proximity of M5 and SW rail

- Langaton Lane is a no through road and is used as a walking route to schools, station, doctors, shops

-The gun range is right next to the old piggery site and the members of that club (including both my sons and my father) have spent an incredible amount of money improving the club and the facilities there.

We will all when adapted pay a fee for maintenance of our country park and estate, will the travellers have to contribute to this as well?

Full name: Stephen Disney

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: I wish to object to the Gypsy site at the former pig farm at the border of Tithebarn and Pinhoe, based on the health implications and well-being of the potential people living there.

The site is right under the M5 motorway. Caravans are not the most noise insulated homes and the noise pollution will not be good to the Gypsy's mental health. The air and tyre pollution that will be spilling of the motorway down into the site will also not be good for their physical health.

I worry that the site is really not going to be good to the resident's health.

Full name: Jessica Pinn

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

This site has been deemed unsuitable for dwellings due to noise from the M5 and flooding in the area, yet the council wants to house traveller families there? Disgraceful, racist and unethical.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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.: Provide plots in a different area of available development land and up to the same standard as anyone else would be expected to live.

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Current residents are already struggling with lack of infrastructure, pollution and lack of school spaces. Developers should halt building until all of these issues can be addressed

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Change the location of the Gypsy and traveller site to a sound and livable site. Not just shoving them in a noisy corner

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: 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: Jamie Purdue

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: As per the NPPF Annex 3, Caravans, mobile homes and park homes are classed as 'Highly Vulnerable' in terms of flood risk vulnerability meaning they cannot be sited within Flood Zones 3a & 3b as per Table 2: Flood risk vulnerability and flood zone 'incompatibility'. It is EDDC's duty to site these vulnerabl properties in Flood Zone 1 as part of the sequential test.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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.: Site any Gypsy & traveller site within Flood Zone 1, with safe access/egress at all times. Flood Zone sites should only be considered once the Sequential test confirms no other available site within the West End. The risk to loss of life due to flooding is high at this site.

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: 'What belongs opposite a Scout hut, between a shooting range and church, within earshot of the M5, inside a Flood Zone, and adjacent to a sewage overflow that has already spilled in 2025?'

This should be a start of a joke, not EDDC's response to a lack of Gypsy & traveller sites in the West End. Clearly not sound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Site any Gypsy & traveller site within Flood Zone 1, with safe access/egress at all times.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Site any Gypsy & traveller site within Flood Zone 1, with safe access/egress at all times. Flood Zone sites should only be considered once the Sequential test confirms no other available site within the West End. The risk to loss of life due to flooding is high at this site.

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: Jason and Emma Stephens

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I am writing to formally raise concerns regarding the proposed development of a Traveller site at Langaton Lane. While we fully acknowledge and support the Government's policy to provide appropriate accommodation for Gypsy and Traveller communities, as outlined in the Planning Policy for Traveller Sites (updated 12 December 2024) (Government Policy Link), we strongly believe that the Langaton Lane site is unsuitable for several reasons.

Our key concerns are:

1. Site Suitability – Environmental and Infrastructure Issues
2. Access and Safety Concerns
3. Educational and Social Disadvantages for Traveller Children
4. Fairness and Transparency of the Site Selection Process
5. Cost-Effectiveness and Public Spending Considerations
6. Conflicts with Local and Regional Transport Policies
7. Failure to Adhere to Government Policy Guidelines

1. Site Suitability – Environmental and Infrastructure Issues

- Floodplain Risk: Approximately one-third of the proposed site lies within a floodplain, raising serious concerns about the safety and sustainability of this development. The Planning Policy for Traveller Sites (Policy C, Paragraph 11) explicitly

states that local planning authorities should ensure Traveller sites are located in areas that do not pose undue environmental risks, including flooding.

- **Noise Concerns:** The site is adjacent to the M5, and other developments in the area have been refused due to excessive noise pollution. The Government's policy highlights that sites must provide a healthy and safe living environment (Policy H, Paragraph 27), which is not the case at Langaton Lane. The Site Selection Report notes that another site (Brcl_02) was considered "probably unachievable" due to noise impact from the M5. However, the report makes no mention of similar concerns regarding the Langaton Lane site, which is equally exposed to the motorway's noise.
- **Ecological Impact on Pin Brook (Minerva) Country Park** The Site Selection Report dismisses ecological concerns as 'minor' without providing evidence. Given the site's location adjacent to Pin Brook (Minerva) Country Park, the failure to assess ecological consequences raises concerns about the validity and thoroughness of the environmental assessment

2. Access and Safety Concerns

- **Narrow Road and Emergency Access:** The report overlooks Langaton Lane's narrowness, particularly in the section between the Pinhoe Rifle Club and the site entrance. This part of the road presents severe challenges for larger vehicles, particularly caravans and trailers, which are expected to use the site. The lane's width is inadequate for such vehicles, leading to previous issues with vehicles unable to turn past the Rifle Club or navigate tight corners, especially in winter when road conditions can be worse. There were historical road width restrictions in this area, and there is no evidence that these constraints have been taken into account in the current proposal. The narrowness of the lane also means that emergency vehicles, including fire trucks, would face difficulty accessing the site in the event of an emergency. This presents a serious fire safety concern, as proper access for fire engines cannot be guaranteed. The Planning Policy for Traveller Sites (Policy B, Paragraph 13) emphasizes that Traveller sites must not compromise emergency vehicle access.
- **Flooding of Langaton Lane:** The access lane to the site, Langaton Lane, is frequently flooded, particularly during heavy rains. This presents significant accessibility challenges, especially for larger vehicles, which would need to access the site. There is also a notable dip and narrow section in the lane near the bridge, making it impassable for double-length wheel-based vehicles. These access issues would severely hamper the movement of residents and pose safety risks in emergencies.
- **Pedestrian Safety:** The lane is used frequently by walkers and cyclists as a designated Green Lane under the Devon County Council Exeter Transport Strategy (2020-2030). The report makes no mention of the current use of the lane, which is a popular route for walking and cycling, noting Langaton Lane's link to Pinhoe Station and

designation as a Green Lane. Furthermore, the suitability of access for a travelling community is not considered, with no acknowledgement of the possible requirement for road widening to ensure safe access of vehicles and pedestrians. This is evidenced by the reference to Langaton Lane as a ‘relatively narrow road’ in the Langaton Lane Green Lane report (CET/22/80), a Report of the Director of Climate Change, Environment and Transport. The level of detail provided in the site selection report is limited, and raises concerns that the full impact, particularly as it relates to safety in relation to the current usage, has not been considered. Increased vehicle movement from the proposed development could pose safety risks and contradict Devon County Council’s goal to promote sustainable transport.

3. Educational and Social Disadvantages for Traveller Children Local schools are already oversubscribed, with currently no spaces being made available to pupils within the area (Tithebarn) to any of the three closest schools – Pinhoe, Westclyst and Monkton. According to the East Devon District Council’s Gypsy and Traveller Plan, Traveller children should have access to education without barriers. However, the only alternative would be for Traveller children to travel long distances for schooling, which contradicts government policy to ensure sustainable site locations (Policy A, Paragraph 7). All traveller children if treated the same as non-traveller children would be allocated schools 2.4 miles away, a 45minutes walk – this is the same school as many children in the Minerva development.

4. Fairness and Transparency of the Site Selection Process

- **Contradictory Assessments:** The Site Selection Report notes that another site (Brcl_02) was considered "probably unachievable" due to noise impact from the M5. However, the report makes no mention of similar concerns regarding the Langaton Lane site, which is equally exposed to the motorway’s noise. This inconsistency suggests a predetermination to favour Langaton Lane over other potentially more suitable sites.
- **Disregard for Community Input:** The Strategic Planning Committee (Meeting, 5 September 2023) noted that Langaton Lane had “little support” from the community, yet it remains the preferred site. This raises questions about the fairness of the consultation process.
- **Lack of Transparency in Methodology** The official Site Selection Report includes placeholder text for the methodology (‘INSERT WEB LINK TO UPDATED VERSION’), suggesting that the assessment was published without a completed methodological framework. This omission further questions the rigour and transparency of the process.
- **Alternative Sites:** Why was Langaton Lane not considered a viable option when the larger Tithebarn plan was first put together eight years ago, especially when there was already a known shortage of Traveller spaces in the region? Had the site been considered earlier, perhaps a more suitable and better-served location could have been

identified. This raises the question as to why larger, more appropriate sites, such as those between the A30 and Topsham, have not been explored. It is also confusing as to why this has been raised now that the sites in the surrounding areas are near completion.

- Financial Bias in Site Selection Council documents regarding Baxters Farm in Musbury indicate that the County Council dismissed it for Traveller accommodation to maximise its value for residential development. This suggests a financial bias that undermines the principle of fair site allocation, as set out in the Council's own Gypsy and Traveller Plan.

5. Cost-Effectiveness and Public Spending Considerations The proposed £600,000 allocation for just five plots seems disproportionate, especially considering the significant infrastructure challenges at Langaton Lane. The lane's narrowness and the impracticality of accessing the site with large vehicles mean that, in the long term, this will likely prove to be an inefficient use of public funds. Furthermore, fire safety concerns also arise due to the single access point and the previously reported limitations regarding vehicle size in the lane. The access issues, combined with the flooding, could present significant safety risks for residents.

6. Conflicts with Local and Regional Transport Policies Langaton Lane is classified as a "Green Lane," as part of the Devon County and Highways Exeter Transport Strategy, which promotes walking and cycling as primary modes of transport. The proposed Traveller site could potentially disrupt this goal, given that the increased vehicle movement would undermine the emphasis on sustainable transport in the region. It is important that the site selection aligns with the wider transport objectives, which would not be the case with Langaton Lane.

7. Failure to Adhere to Government Policy Guidelines The proposal does not align with multiple aspects of the Planning Policy for Traveller Sites, including:

- Policy C, Paragraph 11 (Flood Risk) – The site is partially within a floodplain.
- Policy B, Paragraph 13 (Emergency Access) – The road width does not allow emergency vehicle access.
- Policy H, Paragraph 27 (Site Suitability) – The noise levels from the M5 compromise residents' wellbeing.

- Policy A, Paragraph 7 (Proximity to Services) – Local schools and essential services are already oversubscribed. Conclusion The selection of Langaton Lane for a Traveller site appears to contradict established planning principles and lacks transparency. We urge the Council to reconsider this decision, conduct a more thorough review of alternative sites, and ensure that planning decisions align with Government policies and community needs.

Full name: Matthew Thornton

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

Notwithstanding that the location of the proposed site will devalue property, and increase fly tipping and crime in the local area, I would like to voice my concerns that the site would be contrary to the following guidelines of the Government's planning policy for traveller sites, and is therefore unsuitable:

4j.. lack of school places and too much pressure on doctors, dentists , healthcare services including pharmacies.

4k.. protection of Country Park, and the high quality housing and High Tech Science Park.

10d.. proximity to Flood Zone 3 which in all likelihood will get worse with Climate Change .

10e.. Protection of Wildlife in Country Park, Safety and security of Scouts.
Consideration of welfare and Security for the many residents who have invested hundreds of thousands of pounds in East Devon for a high quality life in a developing high tech area.

13a.. Questionable if a peaceful co-existence can be maintained.

13b.. Lack of health services as in 4j.

13c.. Lack schools as in 4j.

13d.. risk of environmental damage.

13e.. Noise levels with proximity of M5 and SW Rail.

13g.. Site is on Flood Zone 3.

13h.. Langaton Lane is a No Through Road and is a walking route to schools, station, doctors, shops for the hundreds of residents of Minerva Estate.

26.. Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan

As a young working family on the estate, we are deeply concerned of the social, environmental and economic impact it would have on the community, should it be approved.

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: Matthew Thornton

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: UK

Government policy on traveller sites states '26. Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan'

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: In line with above policy paper, a traveller site should be away from existing settlements.

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: Laura Ward

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I am writing to formally object to the proposed development on the Ash Piggery site, Langaton Lane, Pinhoe, Exeter. Whilst I acknowledge the Council has a responsibility to allocate land for gypsy and travellers, I believe that this particular site is unsuitable due to several critical concerns that need to be addressed. These concerns cover significant issues relating to healthcare, education, infrastructure, emergency access, environmental protection, and the broader impact on the community.

1. Demand on Local Healthcare Services The development will place an additional burden on already overstretched local healthcare services, particularly Pinhoe Surgery and Pinhoe Pharmacy. I have been a resident in Tithebarn for over six years and during this time I have experienced a significant increase on waiting times for appointments. It has been highlighted during a meeting over the last few weeks that Pinhoe Surgery are already over capacity and therefore in the very near future they will be unable to register new patients. Introducing more residents to the area will only exacerbate this strain, leading to potential negative impacts on the health and well-being of local families.

2. Strain on Local Education Facilities Local schools in the area are already operating at or beyond full capacity and I am aware, from speaking to local residents, that children living near the proposed site, particularly in the Tithebarn development, are currently unable to access local schools, such as the Cornerstone Academy Trust School in Monkerton and alternatively are being placed at Primary Schools further away, such as Clyst St Mary or St Nicholas Primary School. This is therefore increasing volume of traffic due to children having to commute to school by car. The development would further exacerbate this problem, leading to an increased need for school places that the current infrastructure is simply unable to accommodate.

3. Flooding Risks The majority of the site is located in Flood Zone 3, which indicates a high risk of flooding. The potential for flooding in this area could not only pose significant risks to the new development, but also to the surrounding community, particularly given the site's proximity to sensitive areas. Developing in such a high-risk

flood zone raises serious environmental and safety concerns, especially in light of increasing concerns about climate change and unpredictable weather patterns.

4. Noise Pollution The site is situated near two significant sources of noise pollution, which is the M5 motorway and the Exeter to Waterloo railway line. Caravans/mobile homes will not have the appropriate sound proofing measures to eradicate this noise, like permanent housing have. The 2019 EDDC Planning Officer's report for an adjacent development (19/1950/MFUL) deemed this area unsuitable for standard residential development due to high noise levels and therefore Ash Piggery Site would also be unsuitable.

5. Poor Vehicular Access and Impact on Pedestrian Routes Langaton Lane is a narrow, no-through road and a key pedestrian route, which would make vehicle access to the proposed site extremely difficult. The proposed development will likely increase traffic volumes in an area that is not designed to accommodate such levels of vehicle movement, further compounding congestion and posing safety risks to pedestrians, cyclists, and local residents. This will also have an adverse impact on the character of the area, which currently benefits from its peaceful and green nature.

6. Emergency access Further to the points highlighted in section 5 regarding poor Vehicular Access. Limited access and flooding issues affecting the lane could delay or prevent emergency vehicles gaining access to the site. This will therefore go against the fundamental requirement of ensuring a safe and reliable emergency service access to any residential development.

7. Environmental Impact on Protected Species and Green Lane Status Langaton Lane is a designated green lane, an important environmental feature that supports local wildlife, including protected species. Any development in this area could disrupt the local ecosystem, posing a threat to wildlife habitats and biodiversity. The need to preserve and protect these environmentally sensitive areas is crucial, and the proposed development may undermine the long-term sustainability of the country park.

8. High Development Costs and Public Expenditure The site itself is valued at £600,000, and it is estimated that further development, including converting the existing bungalow into a facilities block could potentially exceed one million pounds in total. Given the significant costs involved, I question whether this is a responsible use of taxpayers' money, particularly when the benefits of the development appear limited and the negative impacts on the community and the environment are so considerable. It has come to my attention that the Traveller site at Broadclyst have four vacant pitches. It would be much more cost effective to utilise these existing pitches, than spend further money on a site that has no guarantee of being fully occupied. Conclusion In light of the above concerns, I strongly urge the planning department to reconsider the proposal for development on this site. The challenges posed by the potential strain on healthcare,

education, environmental protection, and infrastructure, combined with the high development costs and flood risks, make this site unsuitable for development. I believe that a more appropriate and sustainable location should be sought to meet the area's housing needs without compromising the quality of life for existing and future residents.

Full name: Andrew Ward

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: RE:

OBJECTION TO ASH PIGGERY TRAVLLER SITE ALLOCATION IN LOCAL PLAN SITE

ALLOCATION I am writing to formally object to the proposed use allocation for a gypsy traveller site at Ash Piggery, Langaton Lane in Pinhoe stated in the Draft Local Plan.

While I appreciate the need for additional accommodation for the Traveller community, I believe that this proposal site raises several significant concerns that would have a detrimental impact on the local infrastructure and area. Below are some of the planning policy related objections that I wish to raise:

1. Chapter 5: Gypsy and Traveller provision allocation of a Gypsy and Traveller site at Langaton Lane within the Local Plan. While it is imperative that appropriate accommodation is provided for the Gypsy and Traveller community, the selection of this site presents significant concerns regarding its stability. This response evaluates the proposal against National Planning Policy, Equalities Legislation and Best Practice for Gypsy and Traveller site allocations. The number points 10D, 13G relate to the Government's policy paper 'Planning Policy for Traveller Sites'.

2. Planning Policy and Legal Framework The proposed allocation must be assessed in accordance with: The National Planning Policy Framework (NPPF) The Planning Policy for Traveller Sites (PPTS) (Updated December 2024) The Equality Act 2010 The Human Rights Act 1998 The East Devon Local Plan 2020-2042 The Broadclyst Neighbourhood Plan

3. The Planning Policy for Traveller Sites requires Local Planning Authorities to ensure that sites are sustainable, with access to education, healthcare, and other essential services. It also mandates that sites should not be located in areas subject to high levels of environmental harm, including excessive noise and pollution (PPTS, 2024, Policy B).

4. Noise Pollution. The Langaton Lane site is in close proximity to both the M5 motorway and the Exeter to London Waterloo railway line, exposing it to severe noise pollution. The 2019 EDDC Planning Officer's report for an adjacent development (19/1950/MFUL) deemed this area unsuitable for standard residential development due to high noise

levels. While mitigation measures such as triple glazing were proposed for permanent housing, these are not feasible for caravans or mobile homes, rendering the site unsuitable for Gypsy and Traveller accommodation. This aligns with material planning considerations for The Old Piggery, Point 13E, which highlights the severe noise impact of the location.

5. Accessibility and Infrastructure. Langaton Lane is a narrow, rural road with no through access and lacks adequate infrastructure to support further development. While the site is near major transport links, direct accessibility remains problematic. This contradicts the requirement under the PPTS (Policy B 2024) for sites to be in sustainable locations with safe access to essential services. Cont'd

6. Furthermore, Langaton Lane is a key pedestrian route and a no-through road, raising concerns about highway safety and accessibility, Point 13H. The sole access to the site is via a single-track lane that is prone to regular flooding, further exacerbating concerns about site viability. The road also includes a sharp turn, which may present difficulties for long vehicles, including those typically used by the Gypsy and Traveller community. These factors significantly undermine the practicality and safety of the proposed allocation.

7. Emergency Access. The site is located just south of the point where Langaton Lane is 'stopped up,' making it a no-through road. This raises additional concerns about emergency service access. The restricted access route, combined with the narrow lane and its flooding issues, could delay or prevent emergency vehicles from reaching the site in a timely manner. Ensuring safe and reliable emergency access is a fundamental requirement for any residential development, and this location fails to meet that standard.

8. Flood Risk. A significant portion of the site is on land susceptible to flooding. The National Planning Policy Framework (2023) states that new development should be directed away from flood prone areas unless there are overriding sustainability benefits, which do not appear to exist in this case. The Old Piggery site assessment confirms that the site is located within Flood Zone 3, which may worsen with climate change, making it highly unsuitable for residential development. Points 10D and 13G.

9. Strain on Local Services. The proposed site lacks sufficient access to essential public services, including school places and healthcare provision. The Old Piggery site assessment notes that the availability of infrastructure and public services is a key material planning consideration under the NPPF and PPTS. Point 4J. The existing pressure on healthcare services, including doctors, dentists, and pharmacies, would be exacerbated by additional residential development on this site. 10. Environmental and Heritage Concerns. The site is located near the Minerva Country Park, an area designated for biodiversity and green infrastructure. The site assessment, Points 4K,

10E, 13D, highlights the potential environmental damage, loss of green space, and threats to local wildlife. The PPTS (Policy B, 2024) requires that Gypsy and Traveller sites be located in areas that do not harm biodiversity or the environment, making this allocation problematic. 11. Equality and Legal Considerations Under the Equality Act 2010. Gypsies and Travellers are recognised as a protected ethnic group. Allocating a site that is unsuitable for residential use due to environmental factors could be seen as discriminatory if alternative more suitable sites exist. The Human Rights Act 1998 further protects rights to private and family life, which includes the right to a safe and habitable living environment. 12. The Planning Policy for Traveller Sites (PPTS 2024) emphasises that Local Authorities must ensure fairness in site selection, ensuring that Gypsy and Traveller communities are not subjected to substandard living conditions compared to the settled population. The Old Piggery site assessment further supports this by noting that government policy states that Traveller site development should be strictly limited in open countryside, reinforcing the unsuitability of this allocation. 13. Inconsistent with National Planning Policy for Traveller Sites (PPTS). The proposal does not align with the National Planning Policy for Traveller Sites (PPTS), which guides Local Authorities in managing the development of Traveller sites. The PPTS outlines how Traveller sites should be considered in terms of sustainability, access to services, and avoiding harm to the local community. The proposed site fails to meet the sustainability criteria outlined in the PPTS, particularly in relation to the site's proximity to essential services, public transport, and employment opportunities. 14. Impact on Residential Amenity. The development might affect the quality of life for local residents, particularly in terms of noise, privacy, and aesthetic value. Policies that ensure developments do not harm the amenity of neighbouring residential areas (e.g., Local Plan policies on residential amenity or character of the area). The proposed site is located too close to existing residential properties, which will suffer from increased noise, potential for anti-social behaviour and a loss of privacy. 15. The proposed site is isolated and does not have adequate access to public transport, healthcare, or schools, which are required by the National Planning Policy for Traveller Sites (PPTS) to ensure the health and wellbeing of the community. Cont'd 16. Road Safety and Traffic Concerns. Increased traffic from the Traveller site could pose safety risks for local roads, particularly if the site is located near vulnerable areas. Local traffic and highway safety policies require that developments do not result in harm to road safety. The access roads to the proposed Traveller site is narrow and unsuitable for additional traffic, posing a danger to pedestrians and local residents, particularly children attending nearby schools. It also does not appear that the necessary vehicle splay without excessive removal of the existing hedgerow which is contrary to planning requirements. 17. Impact on Local Infrastructure. The proposed site is in an area that already faces pressure on local infrastructure, including road networks, healthcare, and educational facilities. The addition of a Traveller site could place further strain on these services, which are already at capacity. Specifically, the narrow roads in the area, including Langaton and

Orchard Close used as a cut through, which are not suitable for increased traffic, especially if the site is to be expanded or if it becomes permanent. The local medical and educational facilities may also struggle to accommodate additional residents, which could affect the overall quality of service for all residents in the area. I understand the Pinhoe GP Surgery is facing closing their patient list in the near future. 18. Impact on Local Infrastructure. The local school pupils in the Tithebarn area are not currently able to obtain a place at the local schools and are travelling out of catchment to attend school. An increase in school age children will worsen the current situation. 19. Environmental Concerns. Development of this land could lead to the loss of local biodiversity, disrupt wildlife habitats, and negatively affect the surrounding countryside. I am concerned that the development would not be compatible with the area's current environmental status and that adequate measures have not been outlined to mitigate the potential harm to the local environment. 20. Noise and Aesthetic Impact. The establishment of a Traveller site in this location could result in increased noise pollution and visual intrusion for surrounding residents. The peaceful nature of the area, which is an important aspect of the local community, would be significantly affected. Concerns about noise from the site, especially from vehicle movements, families, and any business activities, are a real worry for the wellbeing of local residents. 21. Lack of Adequate Consultation. It is my belief that the local community has not been sufficiently consulted regarding the potential impact of this proposal. The development of such a site should involve thorough discussions with local residents to ensure that their views and concerns are fully considered before any decisions are made. 22. The relevant concerns and objections which were largely included in the Draft East Devon Local Plan Consultation Feedback Report dated July 2023 in addition to other items which I feel are relevant. East Devon Council have already stated in their report that there is limited support for a site in this location are outlined below: ? Policy 18 - Gypsy and Traveller Site East of the M5 and South of the Exeter Waterloo Line. ? Most respondents accepted that there is a need for Gypsy and Traveller provision although support for a site in this location was very limited. ? Concern over the proximity to local community groups, such as scout hut, and their enjoyment of the existing facilities. ? The site is close to existing housing and would have a detrimental impact to the area. ? Langaton Lane is a green lane which has been closed for safety reasons due to the narrow access and concerns with vehicle and pedestrian traffic. ? The safety risk has been accepted as a risk by closure of the through road so I cannot understand how consideration is being given to increased traffic movements. 23. Pinhoe Village residents have submitted a proposal for an alternative 'safe, traffic-free active travel route connecting the communities of Pinhoe, Monkerton and Tithebarn to Pin Brook and Clyst Valley Parks, using paths identified by our communities as historical access points, safeguarding the biodiversity of the wildlife linescape along Pin Brook flood meadows and Pinhoe's Community Field, protecting the character and historical significance of this marshland area.' The submission includes maps of the proposal. 24.

The site is isolated and not integrated alongside bricks and mortar housing, contrary to policy 8. Cont'd 25. The site is in an area of high flood risk, flood zone 3, and will increase flood risk on surrounding areas due to introduction of hardstanding. 26. Development will adversely impact by additional new hard surfaces, road infrastructure, etc. reducing existing green soakaway capacity of this green field site. 27. Concerns regarding security, visual impact, waste, litter, parking, etc. 28. Access to the site is poor for larger vehicles, given the low bridges and the site boundary hedges will be destroyed to create access and visibility. 29. No technical highways assessment is evidenced to support the draft allocation. The sustainability appraisal for the site is out of date, invalid and connectivity distances are now far greater. 30. Allocation is premature as needs assessment is still underway. No alternative sites have been considered. 31. Otter Valley Association have objected to this allocation due to proximity to the M5 and noise exceeding WHO limits. 32. National Highways suggest identified noise impacts from the M5 which should be considered to ensure noise issues are not experienced by future residents. 33. Bricks and mortar housing is unacceptable in this countryside location, Traveller housing should be treated the same way. 34. The Ash Piggery site is currently on the market for sale at £600,000 for a circa 4 acres of agricultural use land. This presents a cost per acre in the region of £150,000. Typically, agricultural land would have a value of £10,000 per acre. It is considered that this site is vastly overpriced and would be a disgraceful use of taxpayer funds when the acquisition and construction costs to convert the existing buildings and infrastructure would likely approach £1m. 35. The East Devon District Council Strategic Planning Committee meeting report on the 5th September 2023 confirmed that there is potential for four additional pitches on an existing site at Elbury Close in Broadclyst. The costs associated with bringing the four additional pitches on an existing site would be a much better use of taxpayer funds due to the lower costs associated with the development over acquisition and construction costs for an alternative site. 36. In conclusion, while I understand the need for providing accommodation for the Traveller community, I do not believe that this location is suitable for such a development due to the negative impacts it would have on local infrastructure, the environment, safety, and the quality of life for surrounding residents. Therefore, I urge East Devon District Council to reconsider the proposal and explore alternative locations that can better meet the needs of the Traveller community without causing undue harm to the local area.

Full name: Derek Ward

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

<https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>

With regards to the proposal for a site for Travellers I am sure that you have studied the Government advice as shown above.

Having made a quick observation of this it seems to me that there are many areas that the Old Piggery Site is unsuitable.

4j.. lack of school places and too much pressure on doctors, dentists , healthcare services including pharmacies. 4k.. protection of Country Park, and the high quality housing and High Tech Science Park. 10d.. proximity to Flood Zone 3 which in all likelihood will get worse with Climate Change . 10e.. Protection of Wildlife in Country Park, Safety and security of Scouts. Consideration of welfare and Security for the many residents who have invested hundreds of thousands of pounds in East Devon for a high quality life in a developing high tech area. 13a.. Questionable if a peaceful co-existence can be maintained. 13b.. Lack of health services as in 4j. 13c.. Lack schools as in 4j. 13d.. risk of environmental damage. 13e.. Noise levels with proximity of M5 and SW Rail. 13g.. Site is on Flood Zone 3. 13h.. Langaton Lane is a No Through Road and is a walking route to schools, station, doctors, shops for the hundreds of residents of Minerva Estate.

It makes no sense to create this as a suitable site for travellers. The site would be ideal to create a a Wetland and develop as such for nature and wildlife ?

The above is just a selection of observations and there are no doubt many more.

Full name: Qian Zeng

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: I have a lot of concerns about the plan to have five fixed permanent dwellings for gypsy site at the board between Tithebarn and Pinhoe due to the below: The site has a flood risk, there is always water around the area and I don't think it's fit for purpose for the travelers. The road is a closed road with only one way to get in and out. And the road is very narrow so and it's not wide enough to have caravans to move in. This road only fit for walking and cycling and small vehicles. I thought it meant to be designed for access to the country park. The scouts is opposite to the site so it might pose concerns for children's safety. It's a waste of public money to set up a traveller site which it's not fit for the purpose. I strongly against this idea please reconsider.

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: > Following the request for engagement with the Council's local plan, the following are my views on policy WS11 > > This proposal is wholly inappropriate for a number of reasons. > > The previously released 'suitability assessment' of the site was staggeringly brief. It read as a 'fait accompli', with the site being justified in retrospect to fit the Council agenda, rather than an independent assessment of suitability. This has the appearance of unfairness and unethical bias. > > The site itself is outside the development area, and is across the road from a similar site which was previously assessed for housing, this was rejected on a number of grounds as being unsuitable. > > The council's own plan recognises that no planning for any other purpose (save for some minor identified associated areas) would be granted - further giving credence to the unsuitable nature of this site for development. > > The access road to this site was made a 'no through road' previously, this being identified as a green route and unsuitable for traffic. This planning application flies in the face of that and is contradictory, inviting further traffic onto this road. This will place pedestrians at greater risk, there are no pavements along this route at all. > > Further, it is identified in your own report that this site is heavily impacted by flooding, rendering a proportion of the site unusable for any residential purpose. How then can the Council assess that this site is suitable for this type of use, given that it is again of a residential nature? > > It appears that this site has not been assessed in good faith, is not suitable for objective reasons, and is being forced through to fulfil a Council agenda rather than because it is right for the area, it's residents, or the proposed residents of the site itself. > > There are myriad areas across East Devon, which may also be in the early stages of development and which don't flood, border noisy transport links or access via green routes frequented by pedestrians.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 would strongly request this proposal to be re-assessed and given proper scrutiny.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: This chapter addresses the allocation of a Gypsy and Traveller site at Langaton Lane within the East Devon Local Plan. While it is imperative that appropriate accommodation is provided for the Gypsy and Traveller community, the selection of this site presents significant concerns regarding its suitability. This response evaluates the proposal against national planning policy, equalities legislation, and best practice for Gypsy and Traveller site allocations. The numbers (e.g. points 10d, 13g, etc.) relate to the Government's policy paper 'Planning policy for traveller sites'

5.1. Planning Policy and Legal Framework The proposed allocation must be assessed in accordance with:

- The National Planning Policy Framework (NPPF);
- The Planning Policy for Traveller Sites (PPTS) (Updated December 2024);
- The Equality Act 2010;
- The Human Rights Act 1998;
- The East Devon Local Plan 2020-2042;
- The Broadclyst Neighbourhood Plan.

5.2. The Planning Policy for Traveller Sites (2024) requires local planning authorities to ensure that sites are sustainable, with access to education, healthcare, and other essential services. It also mandates that sites should not be located in areas subject to high levels of environmental harm, including excessive noise and pollution (PPTS, 2024, Policy B).

5.3. Site-Specific Concerns

5.3.1. Noise Pollution. The Langaton Lane site is in close proximity to both the M5 motorway and the Exeter to London Waterloo railway line, exposing it to severe noise pollution. The 2019 EDDC Planning Officer's report for an adjacent development (19/1950/MFUL) deemed this area unsuitable for standard residential development due to high noise levels. While mitigation measures such as triple glazing were proposed for permanent housing, these are not feasible for caravans or mobile homes, rendering the site unsuitable for Gypsy and Traveller accommodation. This aligns with material planning considerations for The Old Piggery (Point 13e), which highlights the severe noise impact of the location.

5.3.2. Accessibility and Infrastructure. Langaton Lane is a narrow, rural road with no through access and lacks adequate infrastructure to support further development. While the site is near major transport links, direct accessibility remains problematic. This contradicts the requirement under the PPTS (Policy B, 2024) for sites to be in sustainable locations with safe access to essential services. Furthermore, Langaton Lane is a key pedestrian route and a no-through road, raising concerns about highway safety and accessibility (Point 13h). The sole access to the site is via a single-track lane that is prone to regular flooding, further exacerbating concerns about site viability. The road also includes a sharp turn, which may present difficulties for long vehicles, including those typically used by the Gypsy and Traveller community. These factors significantly undermine the practicality and safety of the proposed allocation.

5.3.3. Emergency access. The site is located just south of the point where Langaton Lane is 'stopped up,' making it a no-through road. This raises additional concerns about emergency service access. The restricted access route, combined with the narrow lane and its flooding issues, could delay or prevent emergency vehicles from reaching the site in a timely manner. Ensuring safe and reliable emergency access is a fundamental requirement for any residential development, and this location fails to meet that standard.

5.3.4. Flood Risk. A significant portion of the site is on land susceptible to flooding. The National Planning Policy Framework (2023) states that new development should be directed away from flood-prone areas unless there are overriding sustainability benefits, which do not appear to exist in this case. The Old Piggery site assessment confirms that the site is located within Flood Zone 3, which may worsen with climate change, making it highly unsuitable for residential development (Points 10d, 13g).

5.3.5. Strain on Local Services. The proposed site lacks sufficient access to essential public services, including school places and healthcare provision. The Old Piggery site assessment notes that the availability of infrastructure and public services is a key material planning consideration under the NPPF and PPTS (Point 4j). The existing pressure on healthcare services, including doctors, dentists, and pharmacies, would be exacerbated by additional residential development on this site.

5.3.6. Environmental and Heritage Concerns. The site is located near the Country Park, an area designated for biodiversity and green infrastructure. The site assessment (Points 4k, 10e, 13d) highlights the potential environmental damage, loss of green space, and threats to local wildlife. The PPTS (Policy B, 2024) requires that Gypsy and Traveller sites be located in areas that do not harm biodiversity or the environment, making this allocation problematic.

5.4. Equality and Legal Considerations Under the Equality Act 2010. Gypsies and Travellers are recognised as a protected ethnic group. Allocating a site that is unsuitable for residential use due to environmental factors could be seen as discriminatory if alternative, more suitable sites exist. The Human Rights Act 1998 further protects rights to private and family life, which includes the right to a safe and habitable living environment. The Planning Policy for Traveller Sites (PPTS, 2024) emphasises that local authorities must ensure fairness in site selection, ensuring that Gypsy and Traveller communities are not subjected to substandard living conditions compared to the settled population. The Old Piggery site assessment (Point 26) further supports this by noting that government policy states that Traveller site development should be strictly limited in open countryside, reinforcing the unsuitability of this allocation.

5.5. Chapter 5 Conclusion and Recommendations Given the severe environmental constraints, accessibility issues, and potential legal challenges, the Langaton Lane site is unsuitable for Gypsy and Traveller accommodation. Instead, East Devon District Council should:

5.5.1. Reassess potential alternative sites that meet sustainability criteria.

5.5.2. Conduct a robust Equalities Impact Assessment (EqIA) to ensure compliance with the Equality Act 2010.

5.5.3. Engage in meaningful consultation with the Gypsy and Traveller community to identify more appropriate locations. The Council must ensure that site allocation decisions are driven by sustainability, fairness, and legal compliance rather than expediency. A reconsideration of this allocation is essential to uphold both planning policy and the rights of the Gypsy and Traveller community.

Full name: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS11

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: We support the policy requiring that built development will need to be outside of the area of flood risk, however all development whether 'built' or not should be in flood zone 1. The policy mentions supporting infrastructure- foul drainage will be an important infrastructure requirement.

WS12

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS12

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: 43. In respect of proposed employment land at Sandygate (WS12), Lodge Trading Estate (WS13), Langdon's Business Park (WS14) and Darts Farm (WS15), policy wording states that development may be required to contribute towards localised mitigation on the highway network. 44. We recommend that it may be appropriate to include reference to contributing to wider strategic transport improvements that may yet be identified as necessary to support cumulative growth ambitions.

WS13

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS13

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: ‘Onsite verification of the extent of the Coastal and Floodplain grazing marsh priority habitat and a design and layout which avoids this area’ should be replaced with ‘and a design and layout which protects and enhances this area, including sufficient buffering from development’.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: ‘Onsite verification of the extent of the Coastal and Floodplain grazing marsh priority habitat and a design and layout which avoids this area’ should be replaced with ‘and a design and layout which protects and enhances this area, including sufficient buffering from development’.

Full name: Rosie

Organisation (where relevant): Woodland Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS13

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:
These site allocations contain or are adjacent to either Ancient Woodland or Ancient and Veteran trees and therefore do not comply with the NPPF on irreplaceable habitats.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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 remove this site allocations from the local plan so that they do not impact on ancient woodalnd or ancient and veteran tres

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: As above

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: As above

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: 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: Harriet Fuller

Organisation (where relevant): Environment Agency

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS13

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: We support the requirement for a detailed flood risk assessment, and verification of habitats onsite. It would be preferable for the design and layout to avoid both flood risk areas and priority habitat areas. Even more positive would be an ambition to enhance the habitats onsite.

Full name: Grace Lewis

Organisation (where relevant): Network Rail

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS13

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

- There is potential impact (to some degree) in terms of the increased traffic volumes this creates, leading to extended first and last mile journey times to/from Cranbrook Station;
- To what degree do the LPA expect traffic volumes to increase as a result and, if appropriate, what mitigations would they consider, to improve active travel options/bus connections at the station and in the area to make it more viable as a means of avoiding traffic congestion?

WS15

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: In order to clarify the expected nature of improvements, DCC requests that the second paragraph be amended to read: “Road access for this allocation will most likely need to be through the main Darts Farm access, with the likelihood of highway improvements for pedestrian and vehicular access being needed, and development proposals will be required to demonstrate that this can be achieved safely and without detriment to the existing commercial activities and car parking provision on the wider site. The developer may also be required to contribute towards localised mitigation on the highway network.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Devon County Council objects to allocation Clge_25a until further archaeological work is undertaken. Before site Clge_25a at Darts Farm is allocated in Policy WS15, further archaeological work is required to understand the archaeological resource to determine the suitability of this site for future development as there is a concentration of later prehistoric or Romano-British settlement activity. The County Historic Environment Team is able to provide detailed advice on the extent and scope of the archaeological works required in order to determine the suitability of the site for allocation for development

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please see attached representations.

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.: In order to be able to address any questions about the nature of Darts Farm operations, its future plans and the deliverability of the policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please see attached representations.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 attached representations.

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.: In order to be able to provide the Inspector with more information as required on Darts Farm operation and the services and businesses it supports.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See attached representation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 attached representation.

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.: We wish to have the opportunity to participate in order to provide more information on the nature of Dart's Farm interests and to explain the economic benefits associated with it.

Full name: Liesbeth Kop

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.: I believe the local plan is not legally compliant for the following reasons:

Lack of Public Awareness:

The proposal has not been adequately communicated to the residents of Topsham, who are the most affected by this development. Despite the significant impact on the Topsham area, there has been no distribution of leaflets, no social media advertising, and no other forms of public notification.

Insufficient Consultation: Many residents in Topsham are unaware of the proposals. This lack of awareness is particularly concerning given that the Exeter Local Plan has recently undergone consultation. Residents may mistakenly believe their involvement in the consultation process is complete, without realising the specific implications for Topsham.

Obliviousness to Proposals: The general obliviousness among Topsham residents regarding the development proposals indicates a failure in the communication strategy. Effective public consultation requires that all affected parties are informed and given the opportunity to voice their opinions.

The local plan fails to meet legal compliance due to inadequate public awareness and consultation efforts.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Introduction 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 urge the planning authorities to ensure proper communication and engagement with the residents of Topsham before proceeding with any development.

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: WS15
Objection to Darts Farm Development

I strongly oppose the proposed development at Darts Farm for the following reasons:

Inappropriate Urban Development in a Rural Setting: The proposed development is situated in a rural area that is rich in biodiversity and wildlife. This setting is not suitable for further urban expansion, which would disrupt the natural habitat and negatively impact the local ecosystem.

Existing Retail Developments: There are already substantial retail developments nearby in Sowton and Marsh Barton, Exeter. These existing facilities adequately serve the retail needs of the community, making additional development at Darts Farm unnecessary. Further development is possible in these areas, with appropriate vehicular access

Light Pollution: Light pollution is a significant issue in the area. The lights at the current retail centre dominate the landscape and are often left on 24/7. The proposed development would exacerbate this problem, further spoiling the sensitive environment and affecting local wildlife.

Traffic and Congestion: Darts Farm has recently expanded its car park, utilising green fields. Most visitors travel by car, contributing to increased traffic in Topsham. The Clyst St Mary roundabout and Sandy Gate car park area are already congested, and

additional development would worsen this situation. The proposed developments in Exton, Lymington, and Exmouth will also add to the traffic burden.

Alternative Locations for Employment: It would be more beneficial to locate further employment opportunities in Sowton, Marsh Barton, or preferably in the city centre. The city centre currently lacks diversity in retail ownership, with most shops and retail units owned by a single company. Introducing more businesses in the city centre would enhance its versatility and economic vitality.

The proposed development at Darts Farm is unnecessary and would have detrimental effects on the local environment, traffic, and community.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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 urge the planning authorities to reconsider this proposal and explore alternative locations that are more suitable for development (such as Exeter Sowton, Marsh Barton, or Exeter City Centre) Alternatively, Exmouth town Centre, or some of the other market and coastal town centres such as Honiton, Cranbrook could do with some investment in their town centres to make it more economically attractive for visitors to spend time in.

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: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: ‘If the development will affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA will be required’. Potential impacts to the SPA from adjacent development are not limited to the removal of trees or hedgerows.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: This text should be replaced with ‘consideration of the potential impacts of the scheme on the Exe Estuary SPA by an appropriately qualified ecologist in line with Habitats Regulations requirements’.