

**COMMENTS FROM "THE AVENUES RESIDENTS ASSOCIATION", EXMOUTH,
REGARDING THE EAST DEVON LOCAL PLAN**

GENERAL OBSERVATIONS

| COMMENT NUMBER | COMMENT |
|----------------|--|
| 1 | TARA notes that the notional duration of this Local Plan is from 2020 to 2040. We are now in 2023, so this LP duration is false and should be corrected and updated to reflect the likely adoption date which cannot now be earlier than this year. |
| 2 | Claiming the proposed duration for the LP sets a dangerous and possibly illegal precedent in that appears to imply that EDDC will use whatever the final form of the LP is to back-date any changes to the new Plan versus the preceding Plan. Given that the Draft LP does not draw on up-to-date data - for example, data from 2007 is quoted to justify certain assumptions, plans, and actions - and does not incorporate any of the data which is becoming available from the 2021 Census, the draft LP is clearly flawed at a fundamental level. |
| 3 | Additionally, the draft LP does not take into account statements made by the Government regarding the relaxation of housing targets and the greater say that local communities should have in determining what gets built and where. Whilst TARA appreciate the fact that a formal statement and guidance has yet to be made for Local Authorities to act upon, EDDC are aware that changes are being suggested and so the assumptions within the draft are almost certainly out of date and will require substantial re-evaluation. |
| 4 | As the timetable published for the review of the draft LP is arbitrary and given Comments 1-3 above, it is clear that pursuing the current timetable is unjustifiable. TARA therefore believe that comments received by the due date of January 15th should be held to one side and the current timetable for reviewing the draft LP should be suspended pending clear guidance from the Secretary of State (SofS) regarding Housing Targets and procedures. If EDDC attempt to pursue the current timetable before receiving the guidance from the SofS, which would imply the continued use of out-of-date data and assumptions to execute major changes in East Devon, then it is possible that EDDC will open itself to legal challenge. |
| 5 | TARA notes that EDDC propose major installations of solar panels on prime agricultural land. This is lamentable for two reasons: firstly, the NFU clearly identifies that this country should be maximising production of food using existing farming capacity, but that in fact we are already short of production capacity, so clearly sacrificing farming land for solar panels makes no sense, and is both immoral and irresponsible; secondly, EDDC has failed to insist that new housing developments include solar panels on the roofs of houses: two examples in Exmouth are Plumb Park and Goodmores Farm. This is a massive missed opportunity and EDDC have the powers to insist that new builds should include solar panels. In fact, as is seen repeatedly, EDDC are more concerned at achieving house building targets rather than insisting that the developers act responsibly. It is both obvious and also widely commented upon that EDDC exhibit a supine approach when dealing with developers and rarely show the moral courage to go to court in defence of what is right. |
| 6 | It is quite clear and widely reported that South West Water has a major lack of capacity in handling current volumes of sewage and wastewater. It is ludicrous that EDDC claim that Tourism and the Environment are at the heart of their plans when major house-building is proposed that will simply exacerbate the current problems. EDDC know very well that Water Companies are not permitted to object to proposed building on the basis of lack of treatment capacity. This is another example of weak leadership and management by EDDC. Rather than challenge the housing targets on the basis of lack of service infrastructure which might lead to the Government adopting stronger measures to force appropriate investment by the Water Companies, EDDC takes the easy way out and condemns East Devon, residents, and tourists to have to put up with sewage contamination of water courses, including the environmentally sensitive Exe Estuary, and of prime bathing beaches. |

THIS SECTION RELATES SPECIFICALLY TO REFERENCES MADE TO EXMOUTH IN THE DRAFT LOCAL PLAN

3. The spatial strategy of the Plan

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|---|
| 1 | 3 | 1, 5 & 10 | Exmouth is acknowledged to be the principal centre of ED. A stated aim of the plan is to focus development on the town but there is insufficient provision in it to address severe constraints on local infrastructure: GPs, dentists, schools, shops, recreational facilities, roads, storm water management & sewage treatment, apart from a vague commitment (Section 17.3, P299) to "undertake detailed assessment of infrastructure needs & how we plan for provision". Exmouth's Neighbourhood Plan (2019) highlighted concerns that infrastructure provision in the town has not kept pace with housing development & nothing has changed since that time, in fact the situation is worse. |
| 2 | 3.2 | 13 | Exmouth has very limited employment types, therefore an increase in population will increase congestion in/out of the town and the road to M5 junction. This increase does not support Objective 2 |
| 3 | 3.5 | 14 | In this context what is the definition of "strategic and local facilities": does "strategic" mean "proposed"? Local facilities (GPs, dentists schools etc) are already stretched/over subscribed with existing population. Variation of local shops is reducing requiring locals to travel further afield to shop for items other than food. What improvement is planned and will delivery be aligned with increase in population or after development ? |
| 4 | 3.1 | 17 | "The outstanding open countryside and coastal qualities that characterise much of our District will be protected by ensuring development is only allowed in these areas in limited, locally justified circumstances." This statement is at odds with the amount of development EDDC propose for Exmouth: 1,956 properties , a figure not supported by up-to-date statistics or the 2021 Census. |
| 5 | 3.24 | 22 | We wish to be able to challenge the "Housing Need, Supply and Requirement topic paper as an audit trail document for the Publication Plan stage". We would want to have sight of the interim topic paper referred to at 3.25. |
| 6 | 3.34 - 3.51 | 28-32 | Whilst this sets out aspirations for E Devon and sounds promising, in reality the however studies do not appear to have start or completion dates. We need reassurance that they are carried out prior to major increase in housing or they will not meet Objectives 1,2,9,10 |

6. Strategy for the development at principal centres, main centres, and service villages

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|--|
| 1 | 6.11 | | Current road access and infrastructure to and from Exmouth is inadequate and cannot support further housing development. Additional infrastructure is inadequate - for example schools, NHS, water and sewage. |

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| 2 | 6 | 1 & 8 | "Land on the north-eastern side of Exmouth is proposed for a mixed-use development to provide around 258 new homes and 1 hectare of employment land. Development of these sites will be dependent upon provision of new and safe pedestrian and cycle crossings for this road." Both this development & that of nearby Douglas Gardens (44 new homes) will encroach into green spaces. Critical that green corridors between these spaces are kept open for wildlife if these new builds proceed, & that local infrastructure is suitably upgraded to cope with the town's increased population. |
| 3 | 6 | 5 & 11 | EDDC acknowledges that tourism forms an important part of the town's economy. The council should therefore be taking steps – through higher council tax or any other means - to minimise the number of these proposed new builds that will end up as 2 nd or holiday homes for people domiciled out of Devon |
| 4 | 6 | 4 & 5 | Plan states "Exmouth is very well supplied with services and facilities with a large secondary school and primary schools, a variety of shops, sports facilities, a library, GP, hospital, railway station and regular bus services." Any right-minded resident of the town knows that this is patently untrue with waiting lists for NHS dentists & some GPs, and with retail facilities in the town centre dying a slow death (only last week M&Co announced it is going into liquidation). The town's shopping offering is now overly focussed on coffee and charity shops & fast food outlets. This lack of suitable retail infrastructure needs to be addressed as a matter of urgency before any new major housing development is allowed. |
| 5 | 6 | 1, 5 & 8 | The Exmouth Neighbourhood Plan (2019) places protection of the natural environment, including the setting of green corridors, networks and green spaces in the built-up areas its top priority, & also highlights concerns that infrastructure provision in the town has not kept pace with housing development. Valued green areas include the proposed Littleham/ Maer Valley Park, in which two sites are being earmarked for housing allocation (wholly or in part). This issue of maintaining green spaces & preserving nature, as highlighted in the Neighbourhood Plan, should be respected in full. |
| 6 | 6 | 8 & 11 | The Lymptone Neighbourhood Plan (2015 to 2026) seeks to retain the rural identity of the parish and has a key aim to avoid any steps towards coalescence with Exmouth. Its strategy is to seek to reinforce the Green Wedge within the adopted Local Plan, and to resist development within it & the Coastal Preservation Area. Other key objectives are to keep agricultural land within the parish available for future food and energy production, and to ensure any building development in the plan area bring benefits to the community. However, several of the sites identified for possible 'second choice' allocation in Lymptone parish within the proposed new Local Plan could form a possible northern extension into Exmouth & are within the current Green Wedge area. Others are greenfield sites, some of which are currently in agriculture use. Thus, the suggested housing development to the NE of Exmouth is likely to drive a literal wrecking-ball through the Lymptone Neighbourhood Plan. |
| 7 | 6 | 3 | Referring to "high quality homes to meet peoples' needs": it is questionable whether the EXM06 site is appropriate for the needs of elderly people as it is on steeply sloping ground. |
| 8 | 6.14 | | The Plan makes no reference to the Blue Flag status of Exmouth beach despite the fact that this is a major draw for tourists and holidaymakers. Attracting people to Exmouth is supposed to be at the heart of the LP. |
| 9 | 6.15 | | This paragraph is inaccurate and gives a misleading impression of the quality and quantity of local services. Whilst different services may be present, it is not true to say that either the quality or quantity is sufficient for the existing population, e.g. shops, schools, surgeries. Given the statement that "towards the outer edges of the town many residents are comparatively remote from some services and as such can be car dependent" this does not align with proposals for new housing in these areas of the town which will not be supported by more school, retail, or medical capacity and which will require even more car journeys. |
| 10 | 6.16 | | We note that neither the Jurassic Coast nor the AONB are included and both should be. |
| 11 | 6.18 | | We note that the proposed developments would consume valuable agricultural land and that EDDC's Officers have already commented on the negative amenity impact, not least due to the proximity to the boundary of the AONB. The proposed Littleham / Maer Valley Park shows no signs of becoming a reality as the landowner claims that it would take "valuable agricultural land" - the same landowner is, however, willing to sell parcels of the same land for housing developments and EDDC are complicit in that. In our view these are all good reasons not to permit building at the present time. |
| 12 | 6.69 to 6.74 | | As we have observed regarding Section 6.18 (Comment No. 10 above), no mention is made of Exmouth's Jurassic Coast or AONB. Reading the comments for Budleigh Salterton (Paragraphs 6.69 to 6.74 inclusive) these could have been used with equal relevance in describing Exmouth and we feel that the Section on Exmouth needs a re-write to include similar relevant references. This would also provide sound reasons for non-development on a large scale in the town. |
| 13 | 6.85 & 6.90 | | Could this concept as described for Lymptone also be applied to Exmouth? |
| 14 | 6.103 | | We do not understand why this approach, described for Beer, does not also apply to parts of Exmouth and feel that it should do. |
| 15 | 6.138 (Exton) | | Although traffic congestion on the A376 is cited as a reason for not proposing developments in either Exton or Lymptone, the fact is that the large number of homes proposed for Exmouth, more in fact than exists either of these two villages, is going to generate huge amounts of additional traffic on this road due to the lack of employment in Exmouth. This shows a complete lack of integrated strategic planning and needs to be revised. |

7. Tackling the climate emergency and responding to climate change

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|---|
| 1 | 7 | 2 | Strategic policy number 34 States that replacement of existing habitable buildings with new developments Will only be supported in exceptional circumstances and will need to demonstrate that the full life cycle carbon emissions will be net zero. A current planning application for the Devon Court does not take account of this requirement. Likewise previously mentioned 06 and 08& 16 sites are at risk of flooding now and in the future and should meet the tests as outlined in NPPF |
| 2 | 71 | 1, 6 & 8 | As the plan acknowledges, scope for development at Exmouth, specifically including any outward expansion, will see development set some distance from the town centre services and facilities but close to nationally important environmental assets. The built-up eastern edges of the town are mostly elevated and close to the E. Devon AONB and on the north-eastern side of the town is the important biodiverse Pebblebed Heaths. The western side of Exmouth is flanked by the Exe Estuary which is designated in the highest tier of wildlife sites, and bounded by an eroding coastline. It is crucial therefore that any new housing development must be sympathetic to the needs of these acknowledged nationally important "natural assets", whose preservation in their entirety must be placed ahead of the region's new housing needs. |
| 3 | fig8 | 133 | The proposed development sites do not appear to agree with the first bullet point. |
| 4 | 7.7, 7.10 | 134 | This states that there should be "no impact on Landscape, visual or residential amenity". As Maer Vally has been earmarked as a possible area for solar panels this would contravene such an objectiveThe land concerned also borders the East Devon AONB. |

9. Supporting jobs, the economy, and vibrant town centres

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|---|
| 1 | 9 | 4, 5 & 10 | It is stated that "The Local Plan provides a positive strategy for the future development of town centres and their health is regularly monitored to ensure that, if evidence suggests that they are in decline, the Council is able to implement further measures, along with relevant stakeholders, to support their vitality and viability." What are these measures, when was the "health" of Exmouth last monitored & reported to ETC & when will these measures be implemented for a town that is in decline? |
| 2 | 9.2 | 192 | "supported by a suite of non-strategic policies which provide a clear basis for development management and the determination of employment and other economy related development proposals." What are these Policies? Where is there any evidence of proactivity in attracting employment into Exmouth? |
| 3 | policy 55 | 203 | "Employment and Skills Statements" - no information is provided as to how employment will be found for all the new home owners in the local area to reduce unnecessary journeys to work. This appears to show a lack of an integrated approach in terms of both actions and timing. The LP publication should be delayed until an integrated strategy can be demonstrated which is capable of delivery. |
| 4 | 9.47 9.52 | 206 | "The vitality and viability of these centres is fundamental to the support that they provide for local communities in the settlement and in adjoining areas, who rely on those centres." Exmouth town centre has seen a number of vital shops/facilities close since the pandemic. Increasing the population with a reduction in the town centre facilities does not align with this statement. |

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| 5 | 9.6, 9.61 | 210 | "if evidence suggests that they are in decline, the Council is able to implement further measures, along with relevant stakeholders, to support their vitality and viability." What measures, how and when? This plan does not indicate any plans or capability to do this. |
| 6 | Pol60 | 215 | The statement "foul drainage facilities are adequate" is demonstrably false and amounts to deliberate mis-direction by EDDC. Without adequate facilities the criteria for development are not met and "Sustainable Tourism" is unachievable. |

11. Prioritising sustainable travel and providing the transport and communications facilities we need

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|--|
| 1 | 11 | 9 | It is stated "Exmouth, Honiton, Seaton and Ottery St Mary all have bespoke bus services that travel around these towns, and there are several high frequency bus routes linking East Devon settlements to Exeter. There are also some high quality active travel corridors, notably the Exe Estuary Trail and their proposed Clyst Valley Trail." The #57 bus service from Exmouth-Exeter, plus some other bus services supporting the town, were cut with the onset of the Covid pandemic & have not been reinstated, & so cannot be referred to as "high frequency". Further investment in public transport, in particular more frequent bus services on the busy Exmouth-Exeter route, is critical for supporting people whose jobs lie outside of Exmouth, & for helping to achieve DCC's carbon net-zero aspirations. With the pandemic many folk have unfortunately reverted to their cars as their primary mode of transport which is disappointing & a lost opportunity for DCC. There is a clear need to establish more active travel & sustainable transport options within the town, in particular creation of new sections that will link together existing cycle paths & walkways. |
| 2 | 11.8 | 228 | "20 min neighbourhood" This amounts to nothing more than a fashionable aspiration: the proposed increase in development within Exmouth mean that the desire to provide Health and Well-being and Schools at the heart of communities, and keeping jobs & money local, are all at risk. |
| 3 | Pol 68 | 232 | Pol 68 appears to be incomplete. The Plan needs this section to be completed properly. |
| 4 | 11.27 | 235 | The wording used here is very weak and the Council should be doing more than "liaising", they should provide policy for operators to work to! In TARA's view, EDDC are rightly criticised for showing a lack of leadership and ownership: as an example, "supporting community engagement" in reality is likely to mean "leaving it to the community" rather than EDDC leading. |
| 5 | Pol 27 | 236 | "Developers are encouraged to have early discussions with strategic providers....." Evidence of such discussions should be publicly available and EDDC held to account if they do not show that they have done so. This is a good example of where there should be community involvement in over-seeing delicate and controversial plans. |

12. Caring for our outstanding landscape

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|--|
| 1 | 12 & 13 | 8 | Building development on sites 06 and 08 & 16 is likely to cause disruption to the natural environment and a consequent decrease in biodiversity. Priority should be given to the proposed Littleham/Maer Valley Park |
| 4 | Pol 82 | 249 | How will this policy will be adhered to with all the additional development and with no "approved plan" to improve Exmouth's sewage system? |
| 5 | 12.3 | 250 | "Powers available " sounds like a get out clause. Why cannot EDDC lobby for more power/regulation ? |

15. Our outstanding historical environment

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|--|
| 1 | 15 | 8 & 11 | Proposals for new development must be sensitively designed and not cause harm to the historic environment. We should not be enabling historic towns & villages to merge into one another, as will happen if the green wedge between Lymstone & Exmouth continues to be eroded. |

16. Ensuring we have community buildings and facilities

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|--|
| 1 | 16 | 10 | The infrastructure provision has not kept pace with most recent development at Plumb Park and needs attention before agreeing the allocation of sites 06 and 08&16 |

17. Implementation and monitoring of the Local Plan

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|---|
| 1 | 17.1 | 299 | Sewage should also be included in this paragraph and be reported and monitored |
| 2 | 17.4 | 299 | It is not stated who holds the council responsible and how, and whether the residents of Exmouth see these reports and whether Exmouth Town Council has any responsibility? |

THIS SECTION RELATES SPECIFICALLY TO THE **OVERALL PLAN**

1&2. Introduction, Policies, and Objectives

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|---|
| 1 | Figure 1 | | Key facts point to the point that ' rural areas suffer from relatively poor access to housing and local services. In the plan although this has been identified as a problem, it does not appear to have been address in respect of proposed developments throughout East Devon |
| 2 | 2.3 | | looking to better homes and communities for all and supporting the need for providing affordable housing for residents lives. I am assuming that means current East Devon residents |
| 3 | 2.5 | 3 | we have a major shortfall in respect of affordable housing. Should we be concentrating on building for our current population in the first instance.? There is a recognised issue with airbnb and second homes which are reducing local population ability to remain and purchase in their local area |
| 4 | 2.5 | 6 | Healthy spaces is a pre requirement to support the provision and sustaining of good mental health for all. Area identified in local neighbourhood plans should be welcomed by EDDC and supported |
| 5 | 2.5 | 10 | EDDC needs to liaise with other statutory bodies and utility organisations to ensure that any proposed developments can be fully supported by existing infrastructure or ensure finance is available to secure the necessary infrastruruel changes or improvements |

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| 6 | 2.5 | 11 | Supporting existing villages may lead to the destruction of such communities because of the need for an iterative process to allow them to flourish and grow. Lack of development may hinder their future. Such an approach leads to greater development in towns and thus a movement of village populations to towns where facilities are available. It is important to enhance village services to allow them to survive. development of towns may cost villages in the future |
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3. The spatial strategy of the Plan

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | |
|----------------|-------------------------------------|------------------|---|
| 1 | 3 | 1 - 4 & 11 | The intention of the Plan is to focus housing development within or very close to the major conurbations (Exeter & Exmouth) already existing within ED, on the basis that these have much of the infrastructure & jobs in place needed to support the added population burden. However, there are serious downsides to this housing distribution strategy: it does not help people maintain roots within their own communities or help family generations to live close together, which these days is essential for child care provision reasons. In addition, uprooting people, albeit indirectly, from their natural communities does very little to reduce, & indeed may increase, conventional travel demand within the county, with its inevitable detrimental impact on climate change. Whilst this general strategy for development is eminently understandable, my view is that the emphasis in the Plan has swung too far in this direction & that more development needs to be accommodated within local centres & service villages within the region to cope with indigenous housing demand. |
| 2 | 3 | ALL | Housing Secretary, Michael Gove, has recently stated in the UK government intends to abandon its current target to build 300,00 new homes every year. Housing targets for local authorities will therefore be advisory, rather than mandatory. Gove's department has stated that "Housing targets remain an important part of the planning system and the government will consult on how these can better take account of local density", implying that there will in be much more flexibility going forward for EDDC to implement more effective targets for new builds driven by local demand. Does this mean that EDDC's proposed local plan is redundant even before the consultation has been finalised, & that it needs to be taken back to the drawing board? |
| 3 | 3 | | Is there a recognised need for future development? It is believed that a % of new homes are being used as second homes. A further % is being used by those wishing to downsize. Both of these populations are stopping the developers form being prepared to provide affordable housing - as has been seen in recent build in East Devon towns |
| 4 | 3.2 | | Infrastructure must be adequate for any proposed developments. EDDC must actively work with all external bodies to ensure adequate infrastructure e.g. Education, NHS, Social care, water and sewage, prior to the approval of any future developments. Even small developments can eventually cause infrastructure problems |
| 5 | 3.5/3.6 | 1,9,11 | Too great developments in towns will lead to isolation of smaller towns and villages directly conflicting with outlined objectives |
| 6 | Page 16: Housing Distribution Table | | We cannot find any reference within the Draft LP to how many of the proposed houses are projected to be bought by local people, thus reducing the EDDC affordable housing problem. There should be more discussion and ideas in the LP regarding this and ideas such as those being adopted in Cornwall whereby more new homes are designed from the outset to be truly affordable, as opposed to a notional discount below local market value, and restrictions introduced on the sales of houses for holiday accommodation / second homes. |
| 7 | 3.8 | | The majority of the western side of EDDC is surrounded by river, sea and AONB. The proposal to continue to build in this area will lead to over use of an already broken infrastructure. It will also have a detrimental affect on the Jurassic coast, sea, river and AONBs and the habitat in those areas. Blue Flag status may already be threatened. |
| 8 | 3.10. | | Delighted to see that EDDC recognise the importance to protect the outstanding countryside and coastal areas and intend to protect those areas from development. Building in these special areas will detrimentally change the characteristics of these areas |
| 9 | 3.11 | | Access to Exeter is available from many parts of Devon. Transport links should be enhanced to allow all towns and villages to be able to house those working in Exeter. This development should support objective 9 |
| 10 | 3.11 table | | Delighted to see EDDC support the need to meet strategic policy in respect of future developments and affordable housing |
| 11 | 3.27 | | I don't understand this? Do we have a Neighbourhood Planning Group? Who is it? Have they approached TARA for its views? |
| 12 | 3.34 | | Pleasing to see that there is an intention to attract businesses to the area and are identifying sites for this purpose. I assume that there will be an adequate transport plan to support these developments |
| 13 | 3.36 | | Certain secondary schools do not have the capacity to provide a space for all children within their catchment area |
| 14 | 3.37 | | Recognising the value of existing businesses reliant on tourism and agriculture and ensuring their resilience |
| 15 | 3.65 | | Is their an alternative to using motorways for transporting materials which will enable us to achieve our Objective 2? |
| 16 | 3.75 | | Settlement boundaries must protect AONBs, agricultural land and green spaces |

4. Addressing housing needs and identifying sites for development

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | |
|----------------|----------------|------------------|---|
| 1 | 4 | 3 | in view of the change from the Government setting mandatory targets of housing provision to offering more scope for local authorities to determine their local housing needs there should now be a review of the number of houses needed in E Devon |

5. Future growth and development on the Western side of East Devon

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | |
|----------------|----------------|------------------|--|
| 1 | 5.4 | | The infrastructure has not kept up with developments within existing towns and villages |
| 2 | 5.49 | | Green infrastructure proposal would enable the extension of the existing Maer Valley, replicating the plans for the Clyst Valley Regional Park |

6. Strategy for the development at principal centres, main centres, and service villages

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | |
|----------------|----------------|------------------|--|
| 1 | 6 | 1, 2, 5 & 9 | Implement a county-wide 20s-Plenty scheme. A 20mph traffic speed limit offers many advantages to a region & is known to rank top for cost-effectiveness among urban & village traffic management options. The cost of infrastructure is largely the cost of driving at speed and is not the costs of cycling and walking. Over a wide area, a 20mph limit benefits all road users and the whole community: casualties fall 20%[1], noise almost halves and active travel rises. Climate, safety, active travel, place-making, the economy and quality of life are all helped. More & more of these schemes are being introduced successfully around the UK. [1] http://www.20splenty.org/20mph_casualty_reduction |

7. Tackling the climate emergency and responding to climate change

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| 1 | 7 | 2 | attention needs to be given to improving SWW's provision of adequate sewage disposal and attention to flooding from rivers sea and surface water which is likely to get worse.it is essential to calculate the impact of embodied carbon and retain existing buildings wherever possible and no building development plans should be permitted where there are likely to be unacceptable impacts on landscape, visual,or residential amenity;noise, air, water, highways or health;biodiversity, the natural or historic environment. |
| 2 | 7 | 8 & 10 | None of the proposed new housing developments in the Plan should go forward unless SWW can provide EDDC with categorical assurance that the increased number of connections into their systems will not result in increased discharges of sewage into any of the county's rivers or coastal waters. A water quality, sewage treatment & runoff management study should be a key requirement for site allocations, & also accounted for in planning decisions. |

8. Meeting housing needs for all

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | |
|----------------|----------------|------------------|---|
| 1 | 8 | 3 | Priority must be given to tackling the issue of affordable housing. East Devon has the lowest proportion of affordable housing in the county at 9.6%. These homes need to be built in areas where they are genuinely affordable and focus on locations that can be made sustainable and provide adequate community and recreational facilities. |
| 2 | 8 | 1 & 3 | A ratio of affordable housing builds of 35% outside Cranbrook is stated. EDDC need to write specific measures & commitments into the Plan to ensure that this level of affordable build is actually delivered. As we all know only too well, this level has rarely been achieved in East Devon within mixed communities because of developer constraints & back-tracking. |

10. Designing beautiful and healthy spaces and buildings

| COMMENT NUMBER | SECTION NUMBER | OBJECTIVE NUMBER | COMMENTS |
|----------------|----------------|------------------|--|
| 1 | 10 | 6 | The above would afford scope for putting the emphasis on designing beautiful and healthy spaces and buildings. |