

Filtered Data Export

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:**

Paragraph

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

1.1

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** DCC requests that the following wording is added to the end of paragraph 1.1 to make clear that the Development Plan includes the Minerals and Waste Local Plans: “The Development Plan for East Devon includes the Devon Minerals Plan and the Devon Waste Plan, in addition to the East Devon Local Plan.”

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:**

Paragraph

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

1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:**

Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** Overall, Devon County Council (DCC) views the Publication Draft Local Plan to be generally sound, legally compliant and to comply with the duty to cooperate.

**3. Do you consider that this part of the Introduction chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** Overall, Devon County Council (DCC) views the Publication Draft Local Plan to be generally sound, legally compliant and to comply with the duty to cooperate.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** Overall, Devon County Council (DCC) views the Publication Draft Local Plan to be generally sound, legally compliant and to comply with the duty to cooperate.

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:** 11. Sustainable Transport and Communications

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

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

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

- Otter Trail
- Beer to Axminster and Uplyme

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:** 12. Our Outstanding Landscape

**1. To which part of the Our Outstanding Landscape chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OL07

**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape 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 Our Outstanding Landscape 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 on, adjacent and close to active waste sites should be considered in consultation with Devon County Council as the waste planning authority and in accordance with Policy W10 (Protection of Waste Management Capacity) of the Devon Waste Plan. DCC requests that the following wording is added to Policy OL07 for the protection of waste management capacity:  
“Development on or in close proximity to active, permitted or former waste management sites will only be permitted where it can be demonstrated that there will be no harm to future occupiers of the site from leachate or landfill gas or other waste arising in consultation with Devon County Council as the waste planning authority and in accordance with Policy W10 of the Devon Waste Plan.”

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

2. The Vision

**1. To which part of the vision chapter does your representation relate?:** Paragraph

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

2.1

**2(c). Please set out the modification(s) you consider necessary to make this part of the vision 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.:** Objective 7 only refers to the district's built heritage. Built heritage forms only a part of East Devon's historic environment. The district's historic environment is not formed only by its built heritage, other elements also contribute such as historic landscapes and settlement patterns as well as non-visible, designated and non-designated, heritage assets such as the Roman villa at Seaton, the early medieval iron industry on the Blackdown Hills and the sites of prehistoric and Romano-British settlements across East Devon's landscape. Other heritage assets, such as the large prehistoric defensive sites like Hembury Hillfort and Stockland Great Castle which are fossilised in the landscape by later field boundaries, concentrations of prehistoric funerary monuments like those at Farway Hill, the waterlogged wooden remains of a late medieval sailing vessel in the mouth of the Axe at Seaton, are all national important heritage assets and protected as scheduled monuments and contribute to the district's historic environment. The County Historic Environment Team would therefore suggest that Objective 7 be reworded to state: "Our outstanding historic environment", rather than just the built element of the historic environment, and that its aim should be reworded to "To conserve and enhance our outstanding historic environment."

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP04

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** The county council notes that the Economic Development Needs Assessment (EDNA) from 2020 has been used as part of the suite of evidence base documents. DCC requests that references to the EDNA in the plan include additional wording to clarify how pre-covid trend estimates and changes in demand for the usage class split have been addressed, which may have been affected by more recent economic trends. DCC also recommends that Evidence Base document ECN-007 is updated. DCC considers that all references to the EDNA should include additional wording to clarify how the use of pre-covid trend estimates and the usage class split in the assessment has been addressed, as they may have changed in light of more recent economic trends. In particular, whether the volume of demand and the type of units may have changed since then. This could include, for instance, looking at impacts of remote working on office space and the potential change in demand for warehousing and light industrial.

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP07

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** Education The local education authority supports the proposals set out in the East Devon Local Plan providing that the necessary mitigations are put in place relating to the provision of education, as detailed within the plan policies and IDP. Detailed education comments are provided in Appendix 1. Devon County Council's response to the plan aligns to the local education authority's statutory duty to ensure there is sufficient and suitable education provision for early years and childcare, primary and secondary education, post 16/further education provision and provision for students with education health and care plans up to age 25. The response to the Publication Draft Local Plan is underpinned by the policies in the county council's Education Infrastructure Plan<sup>1</sup>, in particular the provision of local schools for local children as well as recognising schools as a key community asset in support of cohesive communities. The Devon County Council approach to securing contributions<sup>2</sup> informs the infrastructure requests as set out in the IDP which aligns to the DfE National Guidance<sup>3</sup>. 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. DCC considers it essential that the Local Plan provides clarity on the funding of education infrastructure through the provision of Section 106 so that DCC, as local education authority, has greater certainty that developers will be required to fully mitigate the education impact of development. DCC therefore requests amended and additional wording in relation to paragraph 3.44 as shown below. This wording is consistent with Policy SP07 and with supporting statement wording contained in other Local Plans coming forward within Devon. "3.44. Additional homes create the need for additional education provision including for early

years and childcare, primary and secondary education, post 16 and further education, and provision for students with special education needs and disabilities. There are also implications for home to school transport. This education impact of development must be fully mitigated by development and the required education infrastructure is delivered in a timely manner. Education provision is important for the young people of East Devon. Not only does education provide children and young people with the knowledge and skills they require to live fulfilled and productive lives, it helps to reduce inequalities, helps to create supportive communities and has an important role in place-making. Reflecting the impacts which development has on education provision and the associated requirements for expansion or new schools, the provision of early years, primary and secondary education infrastructure, provision for children with Special Educational Needs and Disabilities (SEND) and home to school transport through Section 106 agreement contributions is supported as may be required. The District Council will work with Devon County Council on planning and delivering appropriate education provision making reference to the Devon County Council's Education Infrastructure Plan and Education Approach for Developer Contributions." Paragraph 3.45 understates the essential nature of education provision as a legal requirement and DCC requests that paragraph 3.45 includes additional wording below: "Infrastructure Provision 3.45 Delivering infrastructure alongside housing and economic development is crucial for sustainable communities. This includes essential services like transport, flood risk measures, utilities, and habitat mitigation, as well as daily access to education, health, open spaces, and play areas. Access to education is a legal requirement and statutory duty of the county council meaning the delivery of appropriate education infrastructure to support development is critical. This includes provision for early years and childcare, primary, secondary, post 16 and pupils with special educational needs and disabilities." Devon County Council has a strong preference that county-related infrastructure is funded through Section 106 agreements as this provides greater certainty that sufficient funding is available for delivery of the necessary infrastructure at the appropriate time. The county council does not have control of CIL receipts and has experience that where CIL is intended to support infrastructure delivery, it has not been made available to support this. This is particularly important for the provision of education and transport infrastructure. DCC requests additional wording explaining the need for provision of Section 106 contributions for County related infrastructure is included in paragraph 3.44 as shown above.

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP07

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** Infrastructure Provision  
Devon County Council considers it essential that the infrastructure necessary to support the development proposed in the Local Plan is provided in an appropriately phased and timely manner. To achieve this, appropriate funding mechanisms, which do not rely upon forward funding by the county council will be required, because it cannot be guaranteed that the council will be able to forward fund infrastructure. This is particularly important in relation to education and transport and the second new community where significant new infrastructure is required. The county council looks forward to continuing the work with East Devon District Council on the Infrastructure Delivery Plan. The county council has a strong preference that county-related infrastructure is funded through Section 106 agreements as this provides greater certainty that sufficient funding is available for delivery of the necessary infrastructure at the appropriate time. DCC does not have control of CIL receipts and has experience that where CIL is intended to support infrastructure delivery, it has not been made available to support this. This is particularly important for the provision of education and transport infrastructure. To ensure the availability of funding from development, DCC requests that additional wording is added to paragraph 3.44 of the supporting statement to indicate that funding of education infrastructure to support delivery of the plan will be provided through Section 106 contributions. DCC supports Policy SP07. However, the county council wishes to make some detailed comments on the February 2025 version of the Infrastructure Delivery Plan (IDP). These comments which include requested changes to the wording of the IDP are shown below in the table in Appendix 2 of this letter. Some of the comments in Appendix 2 provide an initial indication of the infrastructure requirements for the second new community that DCC considers would need to be included within the Infrastructure Delivery Plan (or within a dedicated Infrastructure Delivery Plan for the second new community). Please note that these

requirements may need to be revised following further discussion with the district council about the second new community this spring.

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**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

**Other party name (if relevant):**

-

**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

**Other party name (if relevant):**

-

**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

**Other party name (if relevant):**

-

**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

**Other party name (if relevant):**

-

**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:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**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:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**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:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**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:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**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

**Other party name (if relevant):**

-

**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:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD01

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

Minerals and Waste Planning Part of the site allocation Exmo\_20, as identified in Strategic Policy SD01, is within the Mineral Safeguarding Area for sand and gravel resource with further land within the wider Mineral Consultation Area. The allocation has the potential to sterilise underlying sand and gravel and constrain future working within other parts of the Mineral Safeguarding Area. This is inconsistent with NPPF paragraphs 223(c) and 225, and Policy M2 (Mineral Safeguarding Areas) of the Devon Minerals Plan which highlight the importance of identifying Mineral Safeguarding Areas and Mineral Consultation Areas for the protection of mineral resources from non-mineral development. In the absence of measures to protect the mineral resources as specified in the detailed comments in Appendix 1, Devon County Council objects to the allocation of site Exmo\_20. Part of the site allocation Exmo\_20, as identified in Strategic Policy SD01, is within the Mineral Safeguarding Area for the sand and gravel resource with further land within the wider Mineral Consultation Area. As such, Devon County Council as mineral planning authority objects to this allocation on the basis that development has the potential to sterilise underlying sand and gravel and constrain future working within other parts of the Mineral Safeguarding Area, which is inconsistent with NPPF paragraphs 223(c) and 225, and Policy M2 (Mineral Safeguarding Areas) of the Devon Minerals Plan which highlight the importance of identifying Mineral Safeguarding Areas and Mineral Consultation Areas for the protection of mineral resources from non-mineral development.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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.:** Whilst it may be considered that this part of the plan is unsound as it is inconsistent with national policy, it would be possible to address concerns in one of the following ways:

1. Amendments to the wording in Policy SD01 to reduce the extent of the allocation to omit land within the Mineral Safeguarding Area and Mineral Consultation Area (if this option is taken a Mineral Resource Assessment is not required); 2. Amendments to the wording in Policy SD01 to constrain the uses within the Mineral Consultation Area to less noise sensitive uses, compatible with being located adjacent to mineral extraction and no built development within the Mineral Safeguarding Area (if this option is taken a Mineral Resource Assessment is not required);

3. Prior extraction of the mineral resource in advance of development, where it is economic to do so as demonstrated by a Mineral Resource Assessment undertaken by the landowner or East Devon District Council prior to allocation of the site, with appropriate wording included in Policy SD01 to ensure that prior extraction of the mineral takes place if achievable;

4. A Mineral Resource Assessment is undertaken by the landowner or East Devon District Council prior to the allocation of the site, which indicates the mineral resource is not of current or potential economic value. Should a Mineral Resource Assessment be undertaken and indicate that the mineral resource does have current or potential economic value then one of the options 1-3 listed above should be pursued. In the absence of measures to protect the mineral resources as specified in the options above, Devon County Council objects to the allocation of site Exmo\_20. DCC would be happy to discuss with EDDC appropriate amendments to the policy wording as may be required.

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD01

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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.:**

Comments relating to Exmo\_23 and Lymp\_07: To ensure a coordinated and comprehensive approach, DCC suggests that the Exmo\_23 and Lymp\_07 allocations could be covered by a single section (similar to the approach for Exmo\_08 and Exmo\_16), reading as follows or similar wording: "Land at Courtlands Lane (Exmo\_23 and Lymp\_07 combined) The land south of Courtlands Lane (within the Exmo\_23 allocation) will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes. The site at Courtlands Cross north of Courtlands Lane (within the Lymp\_07 allocation) will accommodate around 100 new homes and 0.4 hectares of employment land. The field to the west of the housing allocated land is allocated for delivery of sports pitch uses and associated low key ancillary facilities as part of a viable package of planning obligations. Built development at this site, located on the two south-easterly fields, will need to be particularly sensitively designed to avoid potential for adverse impact on nearby heritage assets and to avoid adverse landscape impacts. These allocations 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. Particular importance is attached to retention of the East Devon Way footpath, in a spacious corridor, across the Lymp\_07 site in a north-south direction. There should also be safe off-street pedestrian and cycle access that provides for east-west movement through the area for existing and future users linking into adjacent areas such as Lympstone Manor. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Through this masterplan, particular account will need to be taken of providing active travel links to the wider network and towards the town centre with alterations to vehicular access along Courtlands Lane.” Comments relating to Lymp\_14 and Exmo\_04a: DCC also requests that an additional paragraph be added to the text relating to both the Lymp\_14 and Exmo\_04a allocations: “The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.” Comments relating to Exmo\_20: DCC also requests that, to clarify requirements and ensure opportunities for sustainable travel are maximised, the text on page 78 relating to site allocation Exmo\_20 be amended to read: “This site allocation will need to come forward on the basis of an agreed masterplan and access strategy for the whole site that clearly demonstrates how phased comprehensive development will be undertaken and implemented, including with appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Full agreement will be required before any specific parcels of land can come forward for development. Built development will need to be concentrated in the southern parts of the site and the scheme will need to place considerable emphasis on protection of the setting and tranquillity of nearby heritage assets, specifically St John in the Wilderness church. Support will be given for expansion of the churchyard, to provide more burial/interment of ashes space at St John in the Wilderness. Parts of the site and adjoining areas, especially woodlands are of biodiversity importance and sensitivity and great care will be needed in developing proposals to ensure their protection and enhancement. New homes and other development that would result in unacceptable impacts will not be permitted within 400 meters of the Pebblebed Heaths. The development will need to be supported by a new developer provided SANGs, brought forward and implemented as part of the overall scheme on the allocated or on nearby land. Vehicular access, to accommodate modest levels of development, will be allowed for southern site parts from the road ‘Southern Wood’, subject to detailed assessment of highway access acceptability and objective review of local road and junction capacity. Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the north. Mitigation measures may be required to address potentially unacceptable adverse highways impacts, including at locations on the wider highway network. High quality, safe and attractive to use pedestrian, cycle and public transport access, particularly providing southerly site links into Exmouth and to nearby services, facilities and job opportunities, will need to be an essential part of the overall development scheme. As part of this, consideration should be given to alterations to vehicular access on St John’s Road, in order to help create quiet routes for walking and cycling.” Comments relating to Exmo\_17: DCC also requests that, to clarify requirements and ensure opportunities for sustainable travel are maximised, the final paragraph of text on page 79 relating to site allocation Exmo\_17 be amended to read: “Vehicular access will be from Salterton Road and will need to take a harmonised approach with the industrial estate to the north of

the road, potentially with a shared intersection. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. As part of this, consideration should be given to exploring alterations to vehicular access on Castle Lane, in order to help create quiet routes for walking and cycling.”

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD01

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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.:** Land for a primary school is allocated at Goodmores Farm, Exmouth, in the adopted local plan. DCC wishes to clarify that this land is still required for wider education purposes, for example provision for pupils with special education needs and disabilities. There is currently a shortfall of this type of provision in East Devon. DCC requests Policy SD01 includes the additional wording shown below to ensure that education land continues to be allocated at Goodmores Farm in the new plan: “Land for Education at Goodmores Farm Additional provision for pupils with special educational needs and disabilities in Devon is required to support development in Exmouth. Land previously allocated for a new primary school at Goodmoores Farm should be retained for wider education purposes, for example to provide an option for new education provision for pupils with special educational needs and disabilities.”

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD02

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

-

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To clarify access requirements, DCC requests that the paragraph relating to the Axmi\_22 allocation be amended to read: "This site is allocated for 100 dwellings. The site layout should make provision for a suitable access road to facilitate the development of site GH/ED/80 to the north and also be designed and built to a standard suitable for use and include land safeguarded at the Lyme Road intersection as part of a possible future relief road to link up to the A358, Chard Road, south of the Weycroft Bridge. Pedestrian/cycle access should be off Loup Court, with Public Rights of Way enhancements."

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD02

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

Devon County Council objects to allocation of four sites in Policy SD02 until further archaeological work is undertaken. Before sites Axmi\_01a, Axmi\_02, Axmi\_08 and Axmi\_09 at Axminster are allocated in Policy SD02, further archaeological work is required to understand the archaeological resource to determine the suitability of these sites for future development as they lie in proximity to the Roman fort (a scheduled monument) and settlement at Woodbury Farm, Axminster. 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 these sites for allocation for development

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD02

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

Policy SD02 should identify the need for additional primary and secondary education infrastructure in Axminster and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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.:** Requested changes to Policy SD02 are shown below: "Expanded primary and secondary school provision in Axminster is required to support further development in Axminster and the wider aspirations of the plan. In addition, further provision for pupils with special educational needs and disabilities in Devon is required."

**Full name:** Jon Williams

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD02

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**  
We are fully supportive of this allocation and consider this site as fully suitable for development.

**4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**Full name:** Jon Williams

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD02

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**  
We are fully supportive of this allocation and consider this site as fully suitable for development.

**4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD03

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

Policy SD03 should reflect the need for improved secondary education facilities in Honiton and recognise this as a requirement to support the policy and wider aspirations of the plan.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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.:** Requested changes to Policy SD03 are shown below with bold for additional wording: “Improved secondary school facilities in Honiton are required to support further development in Honiton and the wider aspirations of the plan. In addition, further provision for pupils with special educational needs and disabilities in Devon is required.”

**Full name:** Jon Williams

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD03

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**  
We are fully supportive of this allocation and consider this site as fully suitable for development.

**4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**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:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD04

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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 SD04 should reflect the need for additional primary and improved secondary education provision in Ottery St Mary and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan. Requested additional wording to Policy SD04 is shown below : “In addition to the delivery of a new primary school with provision for early years in Ottery St Mary, improved secondary school facilities are required to support further development in Ottery St Mary and the wider aspirations of the plan.”

**Full name:** Jon Williams

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD04

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**  
We are fully supportive of this allocation and consider this site as fully suitable for development. The site sits on the very edge of Ottery St Mary. The site is directly adjacent to the B3174 Road which directly connects to the A30 at Daisy Mount Interchange to the east (which is less than 2 miles from the site). This site is on the most accessible side of Ottery St Mary with excellent connectivity. The site is within easy walking distance of the Town Centre. The site allocation of 90 dwellings can easily be accommodated ( including affordable provision). DCC intends to preserve part of the site for a potential primary school which would be sized to initially deliver a 210 place primary school (but with the site being capable of expanding to a 420 place primary school). DCC is also committed to preserving an area of land, which would be suitable for a teaching block of at least 8 classrooms and also provide some additional ancillary land, if identified as necessary, for a future expansion of Kings School. The site is also fully capable of providing Public Open Space, a community access areas, BNG, and an environmental area. The site was subject to an outline planning application in 2020 (East Devon Planning Reference 20/1504/MOUT). This application was refused in large part, as it was an exception site and not included in the Local Plan. This will be resolved

if the site is included in the Local Plan, following examination. The 2020 Outline Planning Application was recommended for approval by East Devon Planners and the application process had positively resolved the vast majority of issues to bring this site forward. The core issues being the following: Site Access – In the 2020 application it was proposed that a roundabout was constructed on the B3174 on the south west quadrant of the site. This roundabout would support both development on Thorne’s Farm and the land to the south of the B3174 which has now been identified in the emerging East Devon Local Plan. This was widely accepted as a good access solution. It was proposed that the development created a spine road through the site which connected to Cadhay Lane on the north east corner of the site. The new spine road provided opportunities to reduce traffic or even make part of Cadhay Lane outside Kings Schools access only. The Outline Planning Application provided positive solutions to provide footways to connect into the existing footpath network to Barrack Road and beyond. The site was to include a network of footways and cycleways to provide good permeability for pedestrians and cyclists. Drainage – The planning application proposed that the site was drained into the watercourse on the northern boundary of the site through a mixture of gravity and pump drainage. These subs solutions were accepted by the Local Authority Flood Team. Topography and Visual Impact – The site gently inclines from east to west and with the western boundary of the site being the higher. The site also slopes towards the B3174. A full Landscape Visual Impact Assessment was undertaken as part of the application by NPS Group and this identified the Visual Impact as low based on a number of viewing points, which were agreed with East Devon Planners. This Visual Impact Assessment was not presented at the Planning Committee. Landscaping and Design – The 2020 Planning Application anticipated that the vast majority of trees and hedges could be preserved and there were good opportunities for additional tree planting within the site, both to improve attractiveness and further mitigate visual impact. The previous application was intended to provide a welcoming ‘street scene layout’ and pick up design element from the local area. Site Viability - In 2020 a joint viability assessment was commissioned by DCC and EDDC. This assessment concluded that - “the application site is sustainable and suitable for the provision of affordable housing being well located to the Town Centre and accessible to services, transport links, facilities and employment opportunities”. Site Layout – The 2020 planning application layout clearly demonstrated that 150 residential units, a primary school site, an area of land preserved for secondary education and an environmental area could all be accommodated successfully on the site. The current proposal for the development of 90 residential units, education areas and other facilities can therefore be comfortably accommodated. Overall – There can be high confidence that this site is deliverable based on the significant body of work that was submitted and accepted as part of the 2020 Outline Planning Application.

**4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**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 would like to participate in the hearing to address any objections that may be raised in relation to this allocation.

**Full name:** Jon Williams

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD04

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:**

-

**2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:**

-

**2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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.:**

-

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:**

-

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

-

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

-

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?:**

-

**4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.:**

-

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

-

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

-

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

-

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD05

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

Devon County Council objects to allocation Seat\_13a until further archaeological work is undertaken. Before site Seat\_13a at Seaton is allocated in Policy SD05, further archaeological work is required to understand the archaeological resource to determine the suitability of this site for future development as it lies in an area of known high archaeological potential to the north and adjacent to the site of a nationally important late Iron Age farmstead and Roman villa that are protected as a scheduled monument. 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:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD05

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To clarify access requirements, DCC requests that the paragraph relating to the Seat\_03 and Seat\_05 allocations be amended to read: "Will need to come forward as a co-ordinated and comprehensive development that delivers the proposed large-scale mixed-use development on the northern edge of Seaton and seeks to deliver the long-standing need for a football pitch as part of a viable package of planning obligations. A harmonised vehicular access will need to be provided off Harepath Road."

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD13

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To clarify pedestrian access requirements, DCC requests that the final paragraph relating to the Char\_04a allocation be amended to read: "Opportunities to provide a connection for residents to Public Right of Way Chardstock Footpath 30 are encouraged and expected along with clear pedestrian links to tie into the existing footways."

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD14

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To clarify access requirements, DCC requests that an additional paragraph be added to the text relating to this policy: "Access considerations for development proposals may need to consider the proposed new community to the east and alterations to discourage additional vehicular use on Bishops Court Lane."

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD15

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To clarify requirements, DCC requests that an additional paragraph be added to the text relating to the Dunk\_05 allocation: “The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.”

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD17

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To ensure a coordinated approach, DCC requests that an additional paragraph be added to the text relating to this policy: “An agreed Masterplan that provides for a development scheme for both allocations at Exton would help maximise the opportunities and minimise the potential adverse impacts of development, including in relation to transport.”

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD18

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To clarify requirements, DCC requests that an additional paragraph be added to the text relating to the Feni\_05 and Feni\_08 allocations: “The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.”

**Full name:** Jon Williams

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD21

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** We are fully supportive of this allocation and consider this site as fully suitable for development.

**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 deal with any objections presented.



**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD22

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** To ensure a coordinated approach, DCC requests that an additional paragraph be added to the text relating to this policy: "A joint transport masterplan encompassing both the Newt\_04 and Newt\_05 allocations would be encouraged by the highway authority."

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):**

-

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD27

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 in the Towns and Villages 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.:** Further detail is required in the supporting statement for service villages (page 95) to provide clarity around the context of land allocated in Tipton for a new primary school. Requested changes to the supporting statement in relation to Policy SD27 are shown below for additional wording: Service Villages (page 95, para 5.14) “Whilst land is allocated in policy SD27 for a new primary school, Tipton St John primary school is being rebuilt by the Department for Education as part of the School Rebuilding Programme and their current preference is to relocate to Land at Thorne Farm in Ottery St Mary.”