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**Climate Change, Environment and Transport**

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27<sup>th</sup> March 2025

Dear Mr Freeman,

**Consultation on the East Devon Local Plan 2020-2042 Regulation 19 Publication  
Draft February 2025**

Thank you for the opportunity to comment on the East Devon Local Plan 2020-2042.

Overall, Devon County Council (DCC) views the Publication Draft Local Plan to be generally sound, legally compliant and to comply with the duty to cooperate. The county council does however object to Policy SD01, specifically the allocation of Exmo\_20 which conflicts with local and national policy in relation to mineral safeguarding. In addition, DCC objects to some allocations where further archaeological work is required before these sites are allocated. Devon County Council continues to be broadly supportive of the emerging East Devon Local Plan 2020-2042. DCC has been in ongoing discussions with East Devon District Council with regard to strategic issues relating to infrastructure provision, transport, education, children's and adult services, mineral and waste planning, economy, flood risk, gypsies and travellers, historic environment, public health and community facilities. This positive and proactive approach has addressed a number of issues prior to reaching this stage of the plan.

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

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

**Infrastructure Provision**

Devon County Council 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.

### **Development strategy and second new community**

Devon County Council supports the spatial strategy contained within the Publication Draft Local Plan in order to locate development in the most sustainable locations where new housing is close to employment, services and facilities and can reduce the need to travel. DCC recognises the key development constraints that limit opportunities to expand existing towns in East Devon. As such the county council has been working closely with the district council to inform the planning and infrastructure requirements for the proposed second new community and to identify appropriate mitigation measures to address the transport challenges. As this work is still ongoing initial comments are provided in this response on Policy WS01 relating to the second new community. The county council intends to provide further comments on the policy in the proposed second Regulation 19 consultation once the second new community proposals are further progressed and the Greater Exeter Transport Study has been completed.

Related to the comments below on Policy WS01, an initial indication of the infrastructure requirements for the second new community that would need to be included within the IDP (or within a dedicated IDP for the second new community) is provided. These requirements may need to be revised following further discussion about the second new community prior to the second Regulation 19 consultation. Further discussion will be required with the district council about the mechanisms for delivering and funding infrastructure at the second new community in advance of the next Regulation 19 consultation.

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

The county council supports the Sustainable Transport and Communications policies set out in Chapter 11 of the Publication Draft Local Plan. In particular, policies TR01 – TR04 would help ensure development prioritises walking, wheeling, cycling and public transport; help deliver and protect critical transport sites and routes; and support the roll-out of electric vehicle charging infrastructure. These policies are aligned with the Devon and Torbay draft Local Transport Plan 4, which aims to support transport decarbonisation, provide well-integrated, inclusive and reliable

transport options, expand walking and cycling networks and help unlock development.

DCC is aware that the potential transport impacts of the proposed second new community (detailed under policy WS01) are significant, due to the scale of the proposed development and its proximity to parts of the transport network which are already under significant pressure (such as Clyst St Mary Roundabout). In light of this, the county council is working closely with National Highways and the district authorities for East Devon, Exeter, Mid Devon and Teignbridge to undertake a Greater Exeter Transport Study, to better evidence the potential cumulative impacts of the development across the districts. Additionally, the county council is investigating solutions to help mitigate these impacts, considering all modes of transport. This work is expected to have concluded by the time of the second Regulation 19 consultation, which will enable more detailed transport comments to be provided through that consultation.

The county council is also aware of particular concerns regarding the transport impacts of development at the Exmo\_20 (Land at St John's) allocation. DCC considers that, if the site is allocated, the large majority of the development should have vehicular access from the B3179 to the north, with only a modest proportion to have vehicular access from Southern Wood. There should be good connectivity for pedestrians, cyclists and bus users with routes towards local amenities to the west of the site and Exmouth town centre. Developers of land within this allocation would be expected to ensure that any vehicular access arrangements do not result in unacceptable adverse impacts on local roads and junctions, with regard to both capacity and safety, with mitigation provided where necessary.

Further site-specific comments, intended to help ensure policies maximise the potential for sustainable travel and reduce the potential for unacceptable transport impacts, are provided in Appendix 1.

## **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>.

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<sup>1</sup> [Pupil place planning - Planning](#)

<sup>2</sup> [Pupil place planning - Planning](#)

<sup>3</sup> [Securing developer contributions for education](#)

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.

### **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.

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.

### **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.

### **Gypsy and Traveller Provision**

It is the role of the local planning authority to plan to meet the needs of gypsies, travellers, and travelling showpeople across East Devon. It is noted that the plan is supported by a needs assessment setting out a requirement for 32 pitches over the plan period. The plan includes proposals for the allocation and delivery of a total of 35 pitches (within the second new community, an allocation to the east of the M5, and within the Cranbrook expansion areas).

Devon County Council has had discussions with TravellerSpace who, it is understood, will be responding to this consultation by way of technical challenge to the methodology used in the needs assessment. The county council is supportive of this challenge and recognises the importance of ensuring a robust assessment has been undertaken.

Notwithstanding the above, the proposals set out in the plan regarding gypsy and traveller provision are considered to be sufficient based on the assessment as published and are located in appropriate locations near to local services and transport options. The delivery of the pitches is considered to be achievable, and therefore, the county council has no objection regarding gypsy and traveller provision. Should a review of the needs assessment be required, the county council would expect provision to be made in the plan for the full assessed need.

### **Historic Environment**

Devon County Council is pleased to note that changes previously requested to the wording of Policy HE04 relating to Archaeology and Scheduled Monuments have been included in the Publication Plan.

However, there are a number of allocations in the Publication Plan where further archaeological work is required to understand the archaeological resource to determine the suitability of these sites before they are allocated for future development. The county council objects to the allocation of these sites until this further archaeological work is undertaken. These sites include Axmi\_01a, Axmi\_02, Axmi\_08, Axmi\_09, Brcl\_26, Clge\_25a and Seat\_13a. More detailed comments about these sites are provided in relation to the relevant site allocation policy in Appendix 1 below. 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 above sites for allocation for development.

### **Flood Risk Management**

Devon County Council as Lead Local Flood Authority (LLFA) is a statutory consultee on surface water drainage. East Devon District Council has undertaken a Strategic Flood Risk Assessment (SFRA) in which the risk of flooding from all sources including the impact of new development and climate change will be considered and used to inform the Local Plan. It is noted in some of the site assessments that the

wording suggests these may have not been updated since the most recent SFRA was published. East Devon District Council should ensure these are reviewed following the publication of the SFRA and new Environment Agency National Assessment of Flood Risk and National Coastal Erosion Risk maps. It is DCC's understanding that East Devon District Council will provide an addendum to the SFRA when the Environment Agency's flood zone mapping is finalised and published. DCC is supportive of this approach.

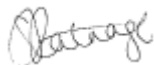
DCC requests a minor wording to change to Strategic Policy AR01 as shown in Appendix 1 below. Overall, the county council considers that detailed site assessments and design considerations relating to surface water drainage can be addressed at planning application stage, and DCC's Flood and Coastal Risk Management Team will be happy to provide further details for this at the appropriate time.

### **Economy**

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. Please see further comments in Appendix 1.

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

Yours sincerely,



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

Appendix 1 – Devon County Council (DCC) Regulation 19 consultation comments on the East Devon Local Plan 2020-2042

DCC Issue	Paragraph/Policy	DCC Comments
Minerals and Waste Planning	Introduction, Para 1.1. Page 15	<p>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:</p> <p><b>“The Development Plan for East Devon includes the Devon Minerals Plan and the Devon Waste Plan, in addition to the East Devon Local Plan.”</b></p>
Historic Environment	Table 1, Planning Objective 7 Page 22	<p>Objective 7 only refers to the district’s built heritage.</p> <p>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.</p> <p>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.</p> <p>The County Historic Environment Team would therefore suggest that Objective 7 be reworded to state:</p>

		“Our outstanding <b>historic environment</b> ”, rather than just the built element of the historic environment, and that its aim should be reworded to “To conserve and enhance our outstanding <b>historic environment</b> .”
Economy	Policy SP04 Page 38	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.
Infrastructure	Policy SP07 Page 43	<p>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.</p> <p>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.</p>
Infrastructure (Education)	Policy SP07 – supporting statement paragraph 3.44 Page 44	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

		<p>3.44 as shown in <b>bold</b> below. This wording is consistent with Policy SP07 and with supporting statement wording contained in other Local Plans coming forward within Devon.</p> <p><b>“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.”</b></p>
Education	Policy SP07 – supporting statement paragraph 3.45 Page 44	<p>Paragraph 3.45 understates the essential nature of education provision as a legal requirement and DCC requests that paragraph 3.45 includes additional wording shown in <b>bold</b> below:</p> <p>“Infrastructure Provision</p>

		<p>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. <b>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.</b></p>
Infrastructure	Policy SP07 Page 44	<p>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.</p>
Waste Planning	Policy WS01 Page 50 and page 54	<p>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</p>

		<p>W10 of the Devon Waste Plan. Therefore, DCC requests that the following wording in <b>bold</b> is added to Policy WS01 (at the end of the third paragraph on page 50) to ensure reference to the Devon Waste Plan:</p> <p><b>“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.”</b></p> <p>In addition, DCC requests the following wording in <b>bold</b> is added to the Waste transfer station section on page 54:</p> <p><b>“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.”</b></p>
Adult social care	Policy WS01 Page 51	<p>The county council requests that the following wording in <b>bold</b> 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:</p> <p><b>“D. a 70-unit extra care housing scheme on 0.8 hectares in accordance with Policy HN03; and</b></p> <p><b>E. residential care home accommodation in accordance with Policy HN03.”</b></p>
Education	Policy WS01 Pages 52-53	<p>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</p>

		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.
Infrastructure	Policy WS01 Page 53	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.
Waste Planning	Policy WS01 – supporting statement Page 55	<p>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:</p> <p><b>“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.”</b></p>
Education	Policy WS04 Page 58	<p>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 with <b>bold</b> for additional wording:</p> <p><b>“Appropriate contributions towards education facilities are required to support this development.”</b></p>

Education	Policy WS10 Page 67	<p>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 with strikethrough for deleted text and <b>bold</b> for additional wording:</p> <p>“C. 1.8 hectares of land safeguarded for education purposes to provide the option for primary education infrastructure on site. Additional <b>education provision for</b> early years, primary, secondary and pupils with special education needs and disabilities, <del>education infrastructure</del> is required to support this development. <del>Additional provision for pupils with special education needs and provision for home to school transport is also required;</del> and”</p>
Historic Environment	Policy WS11 Page 69	<p>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.</p> <p>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.</p>
Historic Environment	Policy WS15 Page 73	<p>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.</p>

		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.
Transport and Highways	Policy WS15 Page 73	<p>In order to clarify the expected nature of improvements, DCC requests that the second paragraph be amended to read (added text in <b>bold</b>):</p> <p>“Road access for this allocation will most likely need to be through the main Darts Farm access, with the likelihood of highway improvements <b>for pedestrian and vehicular access</b> 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.”</p>
Education	Policy SD01 Page 76	<p>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 in <b>bold</b> below to ensure that education land continues to be allocated at Goodmores Farm in the new plan:</p> <p><b>“Land for Education at Goodmores Farm</b></p> <p><b>Additional provision for pupils with special educational needs and disabilities in Devon is required to support development in Exmouth.</b></p> <p><b>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.”</b></p>

<p>Transport and Highways</p>	<p>Policy SD01 Pages 76 – 79</p>	<p><u>Comments relating to Exmo_23 and Lymp_07:</u></p> <p>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:</p> <p><b>“Land at Courtlands Lane (Exmo_23 and Lymp_07 combined)</b></p> <p><b>The land south of Courtlands Lane (within the Exmo_23 allocation) will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes.</b></p> <p><b>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.</b></p> <p><b>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</b></p>
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		<p><b>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.”</b></p> <p><u>Comments relating to Lymp_14 and Exmo_04a:</u></p> <p>DCC also requests that an additional paragraph be added to the text relating to both the Lymp_14 and Exmo_04a allocations:</p> <p><b>“The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.”</b></p> <p><u>Comments relating to Exmo_20:</u></p> <p>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 (added text in bold, strikethrough for deleted text):</p> <p>“This site allocation will need to come forward on the basis of an agreed masterplan <b>and access strategy</b> 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.</p> <p>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</p>
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		<p>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.</p> <p>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 <del>and with mitigation provided to address unacceptable adverse impacts.</del> Primary vehicle access to the site, serving the large majority/large bulk of development, will be from the B3179 to the north. <b>Mitigation measures may be required to address potentially unacceptable adverse highways impacts, including at locations on the wider highway network.</b> 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. <b>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."</b></p> <p><u>Comments relating to Exmo 17:</u></p>
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		<p>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 (added text in bold):</p> <p>“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. <b>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.</b>”</p>
Minerals Planning	Policy SD01 Page 77	<p>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.</p> <p>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:</p> <ol style="list-style-type: none"> <li>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);</li> </ol>

		<p>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);</p> <p>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;</p> <p>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.</p> <p>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.</p>
Historic Environment	Policy SD02 Page 80	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 at 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.
Education	Policy SD02 Page 80	<p>Policy SD02 should identify the need for additional primary and secondary education infrastructure in Axminster and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan. Requested changes to Policy SD02 are shown below with <b>bold</b> for additional wording:</p> <p><b>“Expanded primary and secondary school provision in Axminster is required to support further development in Axminster and the wider aspirations of the plan. In addition, further provision for pupils with special educational needs and disabilities in Devon is required.”</b></p>
Transport and Highways	Policy SD02 Page 80	<p>To clarify access requirements, DCC requests that the paragraph relating to the Axmi_22 allocation be amended to read (added text in <b>bold</b>):</p> <p>“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 <b>designed and</b> built to a standard suitable for use <b>and include land safeguarded at the Lyme Road intersection</b> as part of a possible future relief road to link <b>up</b> to the A358, Chard Road, south of the Weycroft Bridge. <b>Pedestrian/cycle access should be off Loup Court, with Public Rights of Way enhancements.</b>”</p>
Education	Policy SD03 Page 83	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. Requested changes to Policy SD03 are shown below with <b>bold</b> for additional wording:

		<p><b>“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.”</b></p>
Education	Policy SD04 Page 86	<p>Policy SD04 should reflect the need for additional primary and improved secondary education provision in Ottery St Mary and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan. Requested changes to Policy SD04 are shown below with <b>bold</b> for additional wording:</p> <p><b>“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.”</b></p>
Transport and Highways	Policy SD05 Page 88	<p>To clarify access requirements, DCC requests that the paragraph relating to the Seat_03 and Seat_05 allocations be amended to read (added text in <b>bold</b>):</p> <p>“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. <b>A harmonised vehicular access will need to be provided off Harepath Road.</b>”</p>
Historic Environment	Policy SD05 Page 89	<p>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</p>

		<p>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.</p> <p>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.</p>
Transport and Highways	Policy SD13 Page 96	<p>To clarify pedestrian access requirements, DCC requests that the final paragraph relating to the Char_04a allocation be amended to read (added text in <b>bold</b>):</p> <p>“Opportunities to provide a connection for residents to Public Right of Way Chardstock Footpath 30 are encouraged <b>and expected along with clear pedestrian links to tie into the existing footways.</b>”</p>
Transport and Highways	Policy SD14 Page 96	<p>To clarify access requirements, DCC requests that an additional paragraph be added to the text relating to this policy:</p> <p>“<b>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.</b>”</p>
Transport and Highways	Policy SD15 Page 97	<p>To clarify requirements, DCC requests that an additional paragraph be added to the text relating to the Dunk_05 allocation:</p> <p>“<b>The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.</b>”</p>
Transport and Highways	Policy SD17 Page 98	<p>To ensure a coordinated approach, DCC requests that an additional paragraph be added to the text relating to this policy:</p>

		<p><b>“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.”</b></p>
Transport and Highways	Policy SD18 Page 98	<p>To clarify requirements, DCC requests that an additional paragraph be added to the text relating to the Feni_05 and Feni_08 allocations:</p> <p><b>“The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.”</b></p>
Transport and Highways	Policy SD22 Page 100	<p>To ensure a coordinated approach, DCC requests that an additional paragraph be added to the text relating to this policy:</p> <p><b>“A joint transport masterplan encompassing both the Newt_04 and Newt_05 allocations would be encouraged by the highway authority.”</b></p>
Education	Service Villages - supporting statement Page 95  (relating to Policy SD27 Page 103)	<p>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 with <b>bold</b> for additional wording:</p> <p>Service Villages (page 95, para 5.14)</p> <p><b>“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.”</b></p>
Flood Risk Management	Policy AR01 Page 118	<p>DCC as Lead Local Flood Authority (LLFA) is supportive of Strategic Policy AR01: Flooding. It is suggested that Point F within Policy AR01 is reworded</p>

		<p>from "...Culverting should be opposed" to <b>"Culverting should be opposed unless strictly necessary"</b>.</p> <p>It is noted in some of the site assessments that the wording suggests these may have not been updated since the most recent SFRA was published. East Devon District Council should ensure these are reviewed following the publication of the SFRA and new Environment Agency National Assessment of Flood Risk and National Coastal Erosion Risk maps. It is our understanding that East Devon District Council will provide an addendum to the SFRA when the Environment Agency's flood zone mapping is finalised and published. DCC is supportive of this approach.</p> <p>DCC considers that detailed site assessments and design considerations relating to surface water drainage can be addressed at planning application stage, and DCC's Flood and Coastal Risk Management Team will be happy to provide further details for this at the appropriate time.</p>
Economy	Policy SE01 – supporting statement paragraph 9.6 Page 152	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.
Economy	Policy SE06 – supporting statement paragraph 9.33 Page 160	DCC notes the sequential test evaluation was undertaken in 2023 and the most recent town centre retail vacancy rates from December 2024 indicate that there are currently high retail vacancy rates, particularly in Axminster and Honiton. The county council recommends that this evaluation is updated and wording within the Local Plan revised accordingly. However, should an update not be possible, DCC requests that the following wording

		<p>is added to the end of paragraph 9.33 to make clear that the evidence (ECN-007) was produced in 2023:</p> <p><b>“It should be noted the sequential test was undertaken in 2023 and the most recent town centre retail vacancy rates from December 2024 indicate that there are currently high retail vacancy rates, particularly in Axminster and Honiton.”</b></p>
Transport and Highways	Policy TR02 Page 185	<p>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:</p> <ul style="list-style-type: none"> <li>• <b>Otter Trail</b></li> <li>• <b>Beer to Axminster and Uplyme</b></li> </ul>
Waste Planning	Policy OL07 Page 206	<p>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.</p> <p>DCC requests that the following wording in <b>bold</b> is added to Policy OL07 for the protection of waste management capacity:</p> <p><b>“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.”</b></p>

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

Education projects									DCC Regulation 19 comments provided March 2025
Reference	Priority	Location	Project	Cost	Potential Funding Sources	Timescale	Delivery Organisation(s)	Notes/additional justification	
EDU-1	1	Axminster	Expanded Primary Education Provision	£3,532,900	Development Contributions, DCC	TBC 2027 - 2035	Devon County Council	Expansion of existing primary education infrastructure by 175 places in total to meet the needs of planned development at strategic policy SD02. Phase 1 of expansion at Axminster primary school has already been completed.	<p><b>Timescale amendment (Column 7):</b> DCC requests the amendments for accuracy and clarity.</p> <p><b>Additional wording (Column 9):</b> DCC requests additional wording to clarify the relevant Local Plan policies.</p>
EDU-2	1	Axminster	Improved and additional Secondary Education facilities	£1,752,000	Development Contributions, DCC	TBC 2030 - 2042	Devon County Council	Improved and additional facilities at Axe Valley Academy to meet the needs of planned development at strategic policies SD02, SD05, SD09, SD13, SD19, SD20, and SD21.	<p><b>Timescale amendment (Column 7):</b> DCC requests the amendments for accuracy and clarity.</p> <p><b>Additional wording (Column 9):</b> DCC requests additional wording to clarify the</p>

									relevant Local Plan policies.
EDU-3	1	Honiton	Expanded Improved Secondary Education Provision facilities	£500,000	Development Contributions, DCC	TBC-2030 - 2042	Devon County Council	Expansion Improved facilities of at Honiton College to meet the needs of planned development at strategic policies SD03 and SD15.	<p><b>Amended wording (Column 4):</b> DCC requests the amendments for accuracy and clarity.</p> <p><b>Amended timescales (Column 7):</b> DCC requests the amendments for accuracy and clarity.</p> <p><b>Additional wording (Column 9):</b> DCC requests additional wording to clarify the relevant Local Plan policies.</p>
EDU-4	1	West End - North of Topsham <u>OR</u> The New Community  <i>Location TBC</i>	New/expanded primary and early years places provided at North of Topsham or in the Second New Community  1.8ha land for education purposes at	£3,668,038	Development Contributions, DCC	TBC 2032 - 2035	Devon County Council	146 primary school places and provision for early years to be provided through new primary education infrastructure located in the second new community (WS01) or North of Topsham (WS10)	<p><b>Amended timescales (Column 7):</b> DCC requests the amendments for accuracy and clarity.</p> <p><b>Additional wording (Column 9):</b> DCC requests additional wording to clarify the relevant Local Plan policies.</p>

			North of Topsham					to serve development proposed at <b>strategic policy WS10 during the plan period</b> , North of Topsham. The provision of 1.8ha of education land on site at North of Topsham could provide cross boundary opportunity with ECC (1.8ha is suitable for up to 420 place primary school with early years.)	
EDU-5	1	New Community	Additional secondary education provision to <b>accommodate development in the Exmouth area; serve a wider area to accommodate development proposed beyond the second new community.</b>	<b>TBC</b> <b>£7,738,000</b>	Development Contributions, DCC	<del>2025 – 2042</del> <b>2029-2035</b>	Devon County Council	<b>Additional development in and around Exmouth (not including the new community) will require additional places for secondary provision. This may be best served through provision within the development of the new community. Larger education provision at the all</b>	<b>Amended cost (Column 5):</b> DCC requests the amendments for accuracy and clarity.  <b>Amended timescales (Column 7):</b> DCC requests the amendments for accuracy and clarity.  <b>Amended wording (Column 9):</b> DCC requests new wording to clarify the

								<p>through campus in the second new community (WS01) will serve a wider area in order to meet the wider aspirations of the plan during the plan period. This will be achieved through the provision of additional secondary school places at the second new community and the redesign of secondary school designated areas, which in turn will create capacity locally for development proposed beyond the second new community. The campus will also provide much needed Post-16 provision for East Devon as existing options are increasingly limited.</p>	<p>reasoning for the project description.</p> <p>Please note, EDU-5 should be deleted from the IDP if the all through education campus (EDU-11) is included in the IDP to avoid double counting.</p>
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EDU-6	1	Ottery St Mary	New 210 place primary school with provision for early years on a 1.8ha site	£6,000,000	Development Contributions, DCC	TBC 2029 - 2032	Devon County Council	<p>Additional development will cause further pressure on places. Kings School will not expand without a new school site but funding for improved and additional facilities can support an increase in numbers locally to an extent. <b>This will meet the needs of planned development at strategic policy SD04, SD18, SD24, SD27 and SD28 by ensuring there are sufficient school places in Ottery St Mary for the children living in Ottery St Mary. A 1.8ha site will future proof the school allowing for expansion for 420 places if required in the future.</b></p>	<p><b>Amended timescales (Column 7):</b> DCC requests the amendments for accuracy and clarity.</p> <p><b>Amended wording (Column 9):</b> DCC requests new wording to clarify the reasoning for the project description.</p>
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EDU-7	1	West End	Expanded Secondary Education facilities	£3,581,943	Development Contributions, DCC	TBC 2025 - 2035	Devon County Council	Expanded secondary education provision to meet the needs of planned development at strategic policies WS04, SD14, SD07, SD29, in the area.	<p><b>Amended timescales (Column 7):</b> DCC requests the amendments for accuracy and clarity.</p> <p><b>Additional wording (Column 9):</b> DCC requests additional wording to clarify the relevant Local Plan policies.</p>
EDU-8	1	Ottery St Mary	Improved Additional Secondary Education facilities	£500,000	Development Contributions, DCC	2025 - 2035	Devon County Council	Improved and additional facilities at The King's School to meet the needs of planned development at strategic policies SD04, SD18, SD24, SD27 and SD28.	<p><b>Amended wording (Column 4):</b> DCC requests the amendments for accuracy and clarity.</p> <p><b>Amended timescales (Column 7):</b> DCC requests the amendments for accuracy and clarity.</p> <p><b>Amended wording (Column 9):</b> DCC requests amended wording for clarity over facility provision and additional wording to clarify the relevant Local Plan policies.</p>

EDU-9	2	Devon	New SEND education infrastructure	£2,346,552	Development Contributions, DCC	2025 - 2042	Devon County Council	This accounts for all sites of more than 150 dwellings. This does not include the new community (WS01) which will include SEND provision on-site as part of the all through campus.	<b>Additional wording (Column 9):</b> DCC requests the amendments for accuracy and clarity.
EDU-10	2	West End / Mosshayne	New Primary School up to 210 places with provision for early years at land North of Blackhorse/Redhayes (Tithebarn Green / Mosshayne)	£6,000,000	Development Contributions, DCC	2025 - 2030	Devon County Council	To provide education provision for extant allocations at Mosshayne / Tithebarn.	<b>Additional row required:</b> DCC requests this item be included in the IDP. This item relates to extant allocations and is required to support existing permissions.
EDU-11	1	Second New Community	All through campus on 15ha of safeguarded land: 630 primary school place / provision for early years / 750 secondary school places / provision for 200 Post 16	Early Years: £630,000 Primary: £15,814,890 Secondary: £21,900,000* Post 16: £5,840,000 SEND: £3,153,654 (Total: £47,338,544)	Development Contributions, DCC	2029 – 2035  (phased delivery)	Devon County Council	This education provision will meet the needs of the second new community (WS01) and the wider aspiration of the plan during the plan period (2020 – 2042). 15ha required to facilitate future expansion of the	<b>Additional row required:</b> DCC requests this item be included in the IDP due to links between infrastructure in the Second New Community and the wider area during the plan period. *EDU-5 should be deleted from the IDP if the all through education

			places / 27 place special education provision / footprinted for future expansion (Secondary / Post 16 / SEND)					campus beyond the plan period.	campus (EDU-11) is included in the IDP to avoid double counting. Please note, this item may be subject to change following further consultation with EDDC.
EDU-12	1	Second New Community	New 210 place primary school (footprinted for 420 primary school places) with provision for early years on a 1.8ha site	£6,000,000	Development Contributions, DCC	2029 - 2035	Devon County Council	This education provision will meet the needs of the second new community (WS01) and the wider aspiration of the plan during the plan period (2020 – 2042). 1.8ha to provide scope for future expansion of the school within and/or beyond the plan period (linked to EDU-4).	Additional row required: DCC requests this item be included in the IDP due to links between infrastructure in the Second New Community and the wider area during the plan period.  Please note, this item may be subject to change following further consultation with EDDC.
<p><b>Education</b> IDP Notes:            Costs are based on DCC policy at June 2024 rates and subject to indexation.  <a href="https://www.devon.gov.uk/planning/planning-policies/pupil-place-planning/">https://www.devon.gov.uk/planning/planning-policies/pupil-place-planning/</a>            School site sizes are based on the DfE’s BB103 and BB104 guidance (average of min and max areas) Area guidelines for mainstream schools  <a href="#">BB103 DfE Area guidelines for mainstream schools</a>  <a href="#">BB104 DfE Area guidelines for SEND and alternative provision</a></p>									Additional row required: DCC requests this row is added here rather than at the bottom of the IDP.

<p>Education land to be provided at nil cost to the Education Authority, fully serviced. <b>The Education Authority is unable to accept land which requires abnormal costs to deliver education infrastructure in line with the Department for Education’s BB103 area guidelines for mainstream schools and BB104 area guidelines for SEND alternative provision.</b> In addition, costs for home to school transport will be calculated on an individual site basis at the time the applications are validated.</p> <p><b>Primary and Secondary infrastructure costs are based on per a dwelling pupil yield with 2% removed to represent pupils with SEND who will require a special school place. Provision for SEND is shown as separate infrastructure requirements (EDU-9 and EDU-11).</b></p>									<p><b>Additional wording:</b> DCC requests the amendments for accuracy and clarity. The local education authority is unable to accept land with abnormalities to ensure the sites are deliverable within the defined budget. It should also be noted that conditions will be required in relation to the timely delivery of certain education infrastructure.</p>
<b>Community Facilities projects</b>									<b>DCC Regulation 19 comments provided March 2025</b>
Reference	Priority	Location	Project	Cost	Potential Funding Sources	Timescale	Delivery Organisation(s)	Notes/additional justification	
COM-1	1	Ottery St Mary	Extension to Police Station	£308,654	CIL, Devon and Cornwall PCC	2025-2042	Devon and Cornwall PCC	Additional demand generated from levels of proposed growth	
COM-2	1	Axminster	Extension to Police Station	£114,156	CIL, Devon and Cornwall PCC	2025-2042	Devon and Cornwall PCC	Additional demand generated from levels of proposed growth	
COM-3	1	Exmouth	Replacement Police Station	£522,729	CIL, Devon and Cornwall PCC	2025-2042	Devon and Cornwall PCC	Additional demand generated from levels of proposed growth	

Environment & GI Projects									DCC Regulation 19 comments provided March 2025
Reference	Priority	Location	Project	Cost	Potential Funding Sources	Timescale	Delivery Organisation(s)	Notes/additional justification	
ENV-1	1	East Devon (Exe Estuary and Pebblebed Heaths)	Habitat Regulations Assessment mitigation (Suitable Alternative Natural Greenspace provision and SAMM) delivered through updated South East Devon Habitat Mitigation Strategy	TBC	ECC, TDC, EDDC, DCC, Natural England, Environment Agency, developers	2025 - 2042+	East Devon District Council, Natural England, Developers, Landowners	The SE Devon European Site Mitigation Strategy is currently under review and will identify measures required to mitigate the additional development on the European protected sites.	
ENV-2	2	West End	Clyst Valley Regional Park	TBC	S106, CIL, BNG	2025 - 2042+	East Devon District Council, <del>Devon County Council</del> , Natural England, Environment Agency, National Trust, Developers, Landowners	The CVRP is a key strategic priority for the Council to deliver. The Council has adopted a Masterplan which outlines the priorities for delivery to 2045.	<b>Wording removal (Column 8):</b> Request removal of reference to DCC.
Recreation and Sport Projects									

Reference	Priority	Location	Project	Cost	Potential Funding Sources	Timescale	Delivery Organisation(s)	Notes/additional justification	DCC Regulation 19 comments provided March 2025
REC-1	2	Exmouth	Delivery of sports pitch uses at Courtlands Cross	TBC	S106, CIL, external funding/grants	2029 - 2034	Developer	Requirements set out in the Local Plan for delivery adjacent to Lymp_07 allocation. Further details will be set out in the 2025 playing pitch strategy.	
REC-2	2	Seaton	Delivery of football pitch to the north of Seaton	TBC	S106, CIL, external funding/grants	2029 - 2034	Developer	Requirements set out in the Local Plan for delivery as part of the Seaton allocation Seat_03 and Seat_05. Further details will be set out in the 2025 playing pitch strategy.	
REC-3	2	East Devon	Additional sports pitch provision and improvements across the district	TBC	CIL, external funding/grants (P)	2025 - 2042	Clubs, NGBs, EDDC, Sport England, others	A new playing pitch strategy is currently in production for the District, this will identify key projects for delivery. We anticipate having further details for this for at submission.	
<b>Flood Risk and Coastal Change Projects</b>									

Reference	Priority	Location	Project	Cost	Potential Funding Sources	Timescale	Delivery Organisation(s)	Notes/additional justification	DCC Regulation 19 comments provided March 2025
FLO-1	2	Sidmouth	Beach Management Plan actions	£20,000,000	EDDC, Govt funding and external funding sources.	2025 - 2035	East Devon District Council	A £20m scheme is currently being designed to protect more than 110 homes and 70 businesses and further details. Funding for the project has largely been secured largely due to £16m from Govt.	
FLO-2	2	Exmouth	Beach Management Plan actions	TBC	EDDC, Govt funding and external funding sources.	2025 - 2035	East Devon District Council	Work is ongoing on updating the existing Beach Management Plan to manage the risks of coastal flooding and erosion at Exmouth. Possible costs of project could be up to £23m depending on the chosen option.	
<b>Transport Projects</b>									<b>DCC Regulation 19 comments provided March 2025</b>
Reference	Priority	Location	Project	Cost	Potential Funding Sources	Timescale	Delivery Organisation(s)	Notes/additional justification	
TRA-1	1	West End	Additional passing loop on Waterloo train	£50,000,000	Network Rail, EDDC, DCC, DfT, CIL	2025 - 2031	Network Rail, Devon County Council	This project would form part of an extension of the	

			line and associated signalling infrastructure					<p>Devon Metro structure, and will enable a half hourly service between Axminster and Exeter. It provides mitigation against the road traffic impacts from the Cranbrook expansion areas. Potential location near Feniton. The additional passing loop can enhance capacity through enabling greater train service frequency, making rail a more attractive and effective travel option. Cost is DCC estimate, Network Rail have not yet determined the cost. Mosshayne planning application re-submitted - will now be considered under CIL system, which could mean the potential contribution may not be secured.</p>	
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TRA-2	1	Exmouth	Road extension – The completion of Dinan Way to the A376	£17,400,000 £15,800,000	DCC, ETC, EDDC, LUF	2024 - 2025	Devon County Council	Scheme allocated LUF funding. Has planning permission and Cabinet approval. Delivery started and completion scheduled for December 2025 subject to final DfT signoff.	<b>Amended cost (Column 5):</b> It is noted that the anticipated scheme cost is now £15.8m
TRA-3	4	West End - Pinhoe	Improved pedestrian/cycle /vehicular facilities on Langaton Lane (section east of M5 bridge to Tithebarn Lane)	£2,000,000	S106, CIL, DCC	2025 - 2034	Devon County Council, Developer	This project is required in order to reflect the Pinhoe Access Strategy. There remains a funding gap of £2m for the measures set out in the PAAS.	<b>Removal of row required:</b> Enhancements have now been delivered on Langaton Lane, so this project could be removed from the IDP
TRA-4	2	Axminster	Improved footpath and cycleways linking town centre to developments in the north.	TBC	S106, CIL, DCC	2028 - 2042+	Developer, Devon County Council		
TRA-5	2	West End	Public Transport enhancements to improve bus priority between Exeter City Centre and West End development	£1,000,000	S106, CIL, DCC	2021 - 2026	Devon County Council, Developer, Bus operator	e.g. bus priority measures through Science Park / SkyPark.	

TRA-6	2	Sidmouth	Otter Trail - Sidmouth to Feniton cycle route	£1,400,000	S106, CIL, STC, DCC	2025 - 2042	East Devon District Council, Devon County Council, Developer	16km route that loosely follows the old railway line. Cost taken from 'Feniton to Sidmouth (Otter Valley) Trail, Feasibility study - draft report', Sustrans, 2014. Cost includes at-grade crossing of the A3052 - a bridge would add £1.5m. Included in Countywide LCWIP.	
TRA-7	2	Sidmouth	Sidbury to Sidford cycle route	£1,000,000	S106, CIL, Sidmouth Town Council, DCC	2025 - 2031	East Devon District Council, Devon County Council, Developer	Sidford employment allocation should contribute a section. Included in Countywide LCWIP	
TRA-8	2	Seaton to Axminster Cycle Route	Beer to Axminster and Uplyme cycle route	TBC		long term	DCC	Included in Countywide LCWIP	
TRA-9	2	West End	Clyst Valley Trail	£14,000,000	S106, CIL, DCC, National Highways	2025 - 2042+	East Devon District Council, Devon County Council, Developer	The Clyst Valley Trail would be a 13km walking and cycling route linking West Clyst and Topsham, via Clyst Honiton, Sowton	<b>Amended wording (Column 9):</b> DCC requests the wording is amended to reflect changes in the prioritisation of IDP projects and

								and Clyst St Mary. Designed to facilitate both commuting and leisure trips, it would form the backbone of the proposed Clyst Valley Regional Park (IDP Priority 4 2, Draft LP Strategy 16 Strategic Policy WS09). A Public Consultation on the trail was undertaken in 2022, and the trail is identified as a priority scheme in the Clyst Valley and New Communities LCWIP.	numbering of Local Plan policies
TRA-10	2	North of Topsham	Comprehensive package of transport measures to prioritise active travel and public transport on/parallel to Clyst Road. To include continuous north-south walking and	TBC	S106, CIL, DCC	2025-2042	Devon County Council	Draft Local Plan Strategic Policy WS10 proposes significant employment and residential development in the Clyst Road area, with draft text stating that a Development and Infrastructure Delivery	

			cycling routes and bus service enhancements.					Framework will be required, to include 'A comprehensive transport strategy to prioritise active travel and public transport'.	
TRA-11	3	Axminster	Stony Lane junction improvements	TBC	S106, CIL, DCC	2025-2042	Devon County Council	There is ongoing work looking at what improvements can be made	
TRA-12	3	Exmouth	Improvements to existing Avocet Line stations, including lengthening platforms and improving facilities.	TBC	S106, Train operating Company, DfT, DCC. Network Rail, CIL	2025 - 2042	Network Rail, Train Operating Company		
TRA-13	3	Sidmouth	Provision of new access into the Alexandria Trading Estate from the Bulverton Road (B3176)	£1,000,000	S106, CIL, DCC	2017 - 2031	East Devon District Council, Devon County Council, Developer	This access would relieve Alexandria Road and Pathwhorlands from industrial traffic and provide a safer access, and would be supported by EDDC.	
TRA-14	3	Cowley	Section of proposed Boniface Trail	TBC	S106, CIL, DCC	2025-2042	Devon County Council	Section around Cowley is within East Devon although no development	

								planned around there.	
TRA-23	3	Ottery St Mary	Improvements to walking/cycling networks – creating centre link between the western development sites and town centre, employment areas and schools.	TBC	S106, CIL, DCC	2025 - 2042	Devon County Council, Developer	Draft Local Plan Strategic Policy SD04 proposes significant development on the western side of Ottery St Mary (allocations Otry_01b, Otry_09, Otry_10, GH/ED/27). Infrastructure enhancements will be needed to enable safe pedestrian and cycle access to these sites from Ottery St Mary town centre. May involve creating shared use paths alongside the existing highway, Toucan crossings and some areas of new route requiring land negotiation.	Additional row required: DCC request that this project should be reinstated, due to the significant amount of development proposed west of Ottery St Mary. However, further work would be required to design schemes.
TRA-XX	1	Clyst St Mary / New Community	Alterations/Improvements to Clyst St Mary	TBC	S106, CIL, DCC	2025 - 2042	Devon County Council, Developer	Draft Local Plan Strategic Policy WS01 proposes a new community,	Additional row required:

			Roundabout (A3052/A376 junction).					which will eventually allocated at least 10,000 new homes (with land allocated to accommodate the first 8,000 homes), and will have access off the A3052 Sidmouth Road. While it is intended to implement a comprehensive Access Strategy to reduce the amount of vehicular traffic generated, it remains likely that improvements to Clyst St Mary Roundabout will be required.	<p>This project should be included in the IDP for the New Community.</p> <p>This project can be moved to a separate infrastructure delivery strategy, if prepared, for the New Community.</p>
TRA-XX	1	New Community	Alterations/Improvements to A30 Exeter Airport Junction	TBC	S106, CIL, DCC	2025 - 2042	Devon County Council, Developer	Draft Local Plan Strategic Policy WS01 proposes a new community, which will eventually allocated at least 10,000 new homes (with land allocated to	<p><b>Additional row required:</b></p> <p>This project, should be included in the IDP for the New Community.</p> <p>This project can be moved to a separate infrastructure delivery strategy, if prepared,</p>

								accommodate the first 8,000 homes), and will likely have access via the A30 Exeter Airport junction. While it is intended to implement a comprehensive Access Strategy to reduce the amount of vehicular traffic generated, it remains likely that improvements to the A30 Exeter Airport junction will be required.	for the New Community.
TRA-XX	1	New Community	Comprehensive network of walking and cycling routes within New Community and between New Community and surrounding areas	TBC	S106, CIL, DCC	2025 - 2042	Devon County Council, Developer	Draft Local Plan Strategic Policy WS01 states the need for 'convenient and attractive pedestrian and cycle links within the site and to local destinations'. To include measures proposed in the Clyst Valley and	<p><b>Additional row required:</b> This project, should be included in the IDP for the New Community.</p> <p>This project can be moved to a separate infrastructure delivery strategy, if prepared, for the New Community.</p>

								<b>New Communities LCWIP.</b>	
<b>TRA-XX</b>	<b>1</b>	<b>New Community</b>	<b>Provision of a frequent bus service linking the New Community to Exeter city centre</b>	<b>TBC</b>	<b>S106, CIL, DCC</b>	<b>2025 - 2042</b>	<b>Devon County Council, Developer, bus operator</b>	<b>Draft Local Plan Strategic Policy WS01 states the need for 'access to high quality public transport services'</b>	<b>Additional row required:</b> This project, should be included in the IDP for the New Community.  This project can be moved to a separate infrastructure delivery strategy, if prepared, for the New Community.

**Transport notes:**

The list of proposed projects associated with the New Community is not exhaustive and is likely to expand following the completion of the Greater Exeter Transport Study.

**Healthcare Projects**

<b>Healthcare Projects</b>									<b>DCC Regulation 19 comments provided March 2025</b>
<b>Reference</b>	<b>Priority</b>	<b>Location</b>	<b>Project</b>	<b>Cost</b>	<b>Potential Funding Sources</b>	<b>Timescale</b>	<b>Delivery Organisation(s)</b>	<b>Notes/additional justification</b>	
HEA-1	1	Cranbrook	GP facility - possible site North of Tillhouse Road	£20,000,000	S106, CIL, external funding sources	2025-2030	TBC - combination of ICB, Council and/or 3rd party developer	Options for expanding Younghayes as a potential long term GP facility also being considered.	
HEA-2	1	Matford (Phase 1)	GP surgery with 7 consulting rooms which would be branch site of Ide Lane practice	£2,000,000	S106, CIL, external funding sources	2025-2030	TBC - combination of ICB, Council and/or 3rd party developer	Costs may increase in event of any further delays	

HEA-3	1	Matford (Phase 2)	3 additional consulting rooms and open office/admin space in the undercroft of the Phase 1 building.	£2,000,000	S106, CIL, external funding sources	2025-2030	TBC - combination of ICB, Council and/or 3rd party developer	Costs may increase in event of any further delays	
HEA-4	1	Pinhoe GP Practice	Extension to provide 6 additional clinical rooms and further admin space	£1,153,000	S106, CIL, external funding sources	2025 - 2026	TBC - combination of ICB, Council and/or 3rd party developer	The surgery is facing a projected 56% increase in patient numbers over the next 10 years due to new local housing	
HEA-5	1	Seaton	The PCN aspires to make greater use of Seaton Hospital, a central location that can cater for PCN teams (both clinical and non-clinical).	£250,000	S106, CIL, external funding sources	2025-2030	TBC	Waiting to see what RDUH space requirements are in order to understand if there will be any space left over. No update as at 30/10/24. Figure of £250k is a cost estimate and could be higher once detailed work is done.	
HEA-6	3	Axminster	65 unit Extra Care Housing Scheme	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.	

HEA-7	3	Exmouth	189 units of Extra Care Housing (likely to be provided across 2 or more schemes)	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.	
HEA-8	3	Honiton	72 bed Extra Care Housing Scheme	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.	
HEA-9	3	Ottery St Mary	55 bed Extra Care Housing Scheme	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.	
HEA-10	3	Seaton	58 bed Extra Care Housing Scheme	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.	
HEA-11	3	Sidmouth	83 units of Extra Care Housing (likely to be delivered in 1 scheme)	TBC	S106, CIL, external funding sources	2025-2033	Developer, Devon County Council, Care Provider	Need identified in Extra Care Housing Refresh of the Commissioning Strategy for Extra Care Housing, Devon CC, 2015.	

HEA-XX		New Community	70 unit extra care housing scheme	TBC	S106, CIL, external funding sources				<p><b>Additional row required:</b> DCC requests the addition of a 70 unit extra care housing scheme at the second new community as requested in Policy WS01 to ensure the provision of extra care housing in accordance with Policy HN03.</p> <p>This project can be moved to a separate infrastructure delivery strategy, if prepared, for the New Community.</p>
<b>Utilities Projects</b>									<b>DCC Regulation 19 comments provided March 2025</b>
Reference	Priority	Location	Project	Cost	Potential Funding Sources	Timescale	Delivery Organisation(s)	Notes/additional justification	
UTI-1	1	Feniton	A total of 1,060m new water mains will need to be laid within Feniton to enable the growth within the area to go ahead.	£700,000	Funded through the new connection Infrastructure Charge paid by developers (S)	2028 - 2035	SWW		

UTI-2	1	Exmouth	Circa 650m of new water main to the west of the village is required to supply the growth.	£650,000	Funded through the new connection Infrastructure Charge paid by developers (S)	2028 - 2035	SWW		
UTI-3	1	Axminster	A new water booster would be required to supply part of the growth in Axminster	£250,000	Funded through the new connection Infrastructure Charge paid by developers (S)	2028 - 2035	SWW		
UTI-4	1	Ottery St Mary	Circa 700m of new water main to the west of the village is required to supply the growth.	£600,000	Funded through the new connection Infrastructure Charge paid by developers (S)	2028 - 2035	SWW		
UTI-5	1	West End	Investment at Countess Wear Sewage Treatment Works to increase capacity for growth.	£15,000,000	Funded through the new connection Infrastructure Charge paid by developers (S)	2029 - 2035	SWW		
UTI-6	2	Honiton	New Household Waste Recycling Centre (to replace the old facility near Wilmington)	£8,000,000	National and Local Government; private sector	2025 - 2034	DCC	The outdated Sutton Barton recycling facility is too small, unsafe, and poorly located. A new, modern facility is proposed	

								for the Honiton area (ideally Heathpark) to better serve the population.	
UTI-7	3	East Devon	Improve rural broadband to ensure superfast broadband for all by 2020	Not specified	National and Local Government; private sector	2025 - 2042	BDUK, Devon County Council		
<b>Education IDP Notes:</b>									<b>Removal of row required:</b> DCC requests this row is added to the end of the Education section in the IDP rather than at the bottom of the whole IDP.
Costs are based on DCC policy at rates at June 2024 rates and subject to indexation.									
<a href="https://www.devon.gov.uk/planning/planning-policies/pupil-place-planning/">https://www.devon.gov.uk/planning/planning-policies/pupil-place-planning/</a>									
School site sizes are based on the DfE's BB103 and BB104 guidance (average of min and max areas) Area guidelines for mainstream schools (publishing.service.gov.uk)									
Education land to be provided at nil cost to the Education Authority, fully serviced.									
In addition, costs for home to school transport will be calculated on an individual site basis at the time the applications are validated.									