

East Devon Local Plan – Topic Paper

Chapter 5. Development in the Towns and Villages

Audit trail local plan evolution document and consultation statement

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East Devon – an outstanding place

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1 Introduction

- 1.1 This is one of a series of topic papers that will sit behind and help explain the content of and evolution of the Publication draft of the East Devon Local Plan.
- 1.2 There may be new versions of this topic paper as plan making progresses to Publication and thereafter into and through plan Examination.
- 1.3 This topic paper specifically addresses Chapter 5 of the Publication draft of the plan. In this topic paper we reference sites as 'preferred allocations', 'second best' or 'rejected'. These were terms that were used in the draft consultation plan. They are retained for reference purposes in this report, but they do not feature on the Regulation Publication plan. It should be noted that whilst sites were so described in the consultation plan in a number of cases rejected sites are shown as allocations in the Publication plan and 'preferred allocations' or 'second best' sites may not be allocated for development in the Publication plan.

2 The Publication draft of the Local Plan

- 2.1 This report is a redraft of an earlier report and in revised form it is specifically concerned with supporting the local plan at the Regulation 19 stage of plan making work. There are specific Government regulations that apply to local plan making and these set out actions that need to be undertaken at different regulatory stages (this report specifically relates to Regulations 18, 19 and 20).
- 2.2 The proposed Publication draft text of the local plan is an edited and amended draft of the consultation draft plan published in November 2022. The draft plan was consulted on under plan making Regulation 18 with further limited additional consultation under this regulation in the Spring of 2024.

3 Summary of proposed redrafting to form Chapter 5 of the Reg 19 plan

- 3.1 This chapter of the plan contains a series of policies on the strategy for development at the Principal Centre, Main Centres, Local Centres and Service Villages, by allocating housing and employment sites at these settlements. In the consultation draft Local Plan (November 2022) this chapter contained eight policies (Strategic Policies 19-26).
 - 3.2 In the tables that make up this report specific comment is made in respect of sites that featured in consultation.
 - 3.3 Redrafting to form Regulation 19 of the plan has resulted in each settlement that has land allocations for development being given its own separate policy. These run, sequentially, from
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Strategic Policy SD01 for Exmouth through to Strategic Policy SD29 for Whimple. It should be noted that some settlements referenced in this paper do not have allocations of land for development and do not therefore have an allocation policy in the plan.

4 Commentary on infrastructure capacity and general development concerns

- 4.1 There were a very large number of site-specific objections to the plan, at various stages of consultation, that commented on general broad ranging infrastructure concerns. Many themes were re-occurring across a great many sites. Rather than repeat the same feedback messages for tens/hundreds of sites we set out some general comments below that should be read alongside themes and issues raised in respect of site objections. Generally, it is only where people make comments about infrastructure concerns there are very site specific in nature that we provide specific comment in the site's commentary.
- 4.2 In a great many site specific objections and comments people expressed the view that there were not sufficient doctors, school places, emergency services, libraries or other social or community facilities to support development of any given housing site. Whilst recognising that many such services are stretched this is not a problem that is unique to any given site, or settlement in East Devon, nor East Devon as a whole. The problems and challenges of service provision exist at a national level and as such (unless very localised exceptional circumstances exist, for which we have no evidence) lack of these facilities would not be grounds to not take a site forward as an allocation for development. Through development we could look, however, to secure extra or new or improved facility provision.
- 4.3 Sewage capacity concerns were a reoccurring theme in site specific comments. It is recognised that there are capacity constraints and the Council is seeking to work with South West Water to resolve problems. We are, however, reliant on technical advice by South West Water around capacity matters and they determine acceptability of new development schemes to connect to their systems.
- 4.4 Many respondents highlighted wildlife and biodiversity impacts concerns associated with development at sites. Where sites and abutting areas have a national or local designation, or a local designation or support endangered species, these concerns have been taken into account through the choices made around allocating sites. Policy development will also take such matters into concern noting potential for design requirements to feature in policy wording. It is also the case that less protect habitats and species will have been taken into account. However, it needs to be recognised that any undeveloped land, and indeed lots of areas of developed land (such as back gardens), can be home to wildlife and it is impossible to avoid building on land where wildlife may exist. With biodiversity net gain now featuring on emerging plan policy, and with a minimum target of 20% plus gain on qualifying sites, development can bring about net biodiversity gain.

- 4.5 Transport and public transport concerns were highlighted in many comments. A number of sites were not considered as acceptable on highway access grounds or because of adverse impacts on the highway network, especially around capacity matters. We have sought the advice of Devon County Council as the local highway authority in respect to development sites and are not proposing to allocate sites that they have raised objections to. Devon County Council, looking at the scale and distribution of development overall, have not raised network capacity concerns. In a limited number of cases National Highways, specifically with respect to possible adverse impacts on the Strategic Road Network (trunk roads and motorway) have also commented and these comments have informed allocation choices. It should be noted that at the time of this draft there was ongoing work with neighbouring authorities and the highway authorities in respect of strategic transport matters at and around the city of Exeter.
- 4.6 Loss of green fields and land for agricultural production also featured in many comments. There is an inevitability that much of the development we have to accommodate will have to be built on green field sites. There is simply not appropriately located brownfield land in anything like enough quantities to accommodate development levels set out by Government. Loss of higher-grade agricultural land is a concern, but needs to be balanced against other planning considerations. One of the major considerations is that much of the better farmland in East Devon lies in the western part of the district close to Exeter, but this strategically has been identified for higher growth levels. In contrast much of the less productive land is in remoter areas and much falling in designated National landscape areas.
- 4.7 Flooding concerns have been raised on a number of sites. We have looked at flooding matters in some depth and this has included through Strategic Flood Risk assessment. We are not carrying proposed allocations forward if we are aware of technical flooding concerns. It is also relevant to note that levels of water leaving development sites, after development has occurred, will need to be equal to or lower than rates leaving any site prior to development. There should be no net increase in run-off.

5 Issues and options consultation

- 5.1 Prior to production and consultation on the draft local plan the Council consulted on a local plan Issues and Options¹ report. This included a series of questions that responses and comments were invited on. A feedback report was published², followed by a summary of main issues raised and Officer response.³

¹ [issuesandoptionsreport-jan2021.pdf \(eastdevon.gov.uk\)](#)

² [2a. Consultation feedback report Ver 03.pdf \(eastdevon.gov.uk\)](#)

³ [1f IO_Summary of main issues and council response.pdf \(eastdevon.gov.uk\)](#)

- 5.2 The Issues and Options report contained various options relating to the settlement hierarchy and broad distribution of development but did not include site allocations so has little direct relevance for what is now Chapter 5 in the Regulation 19 plan. Nevertheless, a call for sites took place alongside the Issues and Options consultation, from which many of the site allocations derive.

6 Draft plan consultation

- 6.1 In Draft Plan consultation, the strategy for development at the Principal Centre, Main Centres, Local Centres and Service Villages was addressed in Chapter 6. The feedback report, summarising the issues raised in the consultation can be read here (starting on page 119) [accessible-reg-18-consultation-feedback-report-spring-2023.pdf \(eastdevon.gov.uk\)](#).
- 6.2 Numerous consultation responses were made on chapter 6, from a wide range of stakeholders including statutory consultees, developers and members of the public. Further detail is contained in the tables for each policy that follow.

7 Further Regulation 18 consultation Spring 2024

- 7.1 The Further Draft Local Plan consultation included a total of 13 housing, and 15 employment, site allocations. These sites have been incorporated into the policy boxes that follow in section 9.

8 Sustainability Appraisal and site assessment work

- 8.1 The draft local plan was supported by a Sustainability Appraisal⁴ (SA). This SA will be updated and refined as plan making progresses and it will be one of the documents that is submitted as part of the submission for Examination.
- 8.2 Each site allocation and reasonable alternatives have been subject to SA, as detailed in the SA Report. It should be referred to for further information and commentary on site findings through its assessment.
- 8.3 All potential sites have also been assessed through settlement specific bespoke site assessment reports. These forms part of the evidence base for the local plan and should be read alongside this paper, the local plan and other reports.

9 Habitat Regulation Assessment

- 9.1 The local plan will need to be assessed under the Habitat Regulations. An assessment of policies in the draft plan has been produced, available at [east-devon-local-plan-hra-110723-2013-doc-from-](#)

⁴ [sa-of-pos-consultation-draft-lp_2022.pdf \(eastdevon.gov.uk\)](#)

[footprint.pdf \(eastdevon.gov.uk\)](#) An outline of the HRA findings for each site is contained in the policy boxes that follow in section 9.

10 Assessment of policies in chapter 6 of draft plan and Chapter 5 of the Regulation 19 plan

- 10.1 What was Chapter 6 in the draft plan, now Chapter 5 in the Regulation 19 plan, set out a series of policies that are reviewed below.
- 10.2 Note that references in the rest of this report to Chapter 6 are written in the context of this chapter at consultation draft stage. But now apply to Chapter 5 in the Regulation 19 Publication plan.

General issues raised on plan chapter	
<ul style="list-style-type: none"> As well as providing a summary of consultation issues relating to Principal Centres, Main Centres, Local Centres and Service Villages, this section also highlights feedback on settlements not included in these policies. 	
Issues and options consultation	
<ul style="list-style-type: none"> The Issues and Options report contained various options relating to the settlement hierarchy and broad distribution of development but did not include site allocations so has little direct relevance for chapter 6. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> No specific comment provided.
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> The East Devon AONB team raises concerns that the site assessments are made in principle only with no specific details provided. There is no context to Chapter 6 regarding identifying allocation sites for possible development and how these may be within or in the setting of AONBs. The number, type, layout and appearance of development will significantly affect the landscape impact and allocation alone does not address this. Reference to this should either be made in the context or within each Policy relevant to AONBs. Any of the Policy proposals that indicate additional development in settlements within or adjacent AONBs should require the provision of an appropriate LVIA or landscape assessment to accompany any development proposal in line with the AONB policy. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> Landscape sensitivity assessment has been undertaken for all potential site allocations and are included in the Site Selection reports. This has considered the impact on National Landscapes/AONBs. Further work is being prepared to justify any allocations within National Landscapes, consistent with the NPPF. Similarly, Historic Environment Site Assessment (HESA) has been undertaken for allocations that are likely to have an impact upon designated heritages assets – these are included in the Site Selection reports. The need for more affordable housing is noted and considered by other Local Plan policies.

- Policy maps- Maps should show existing and proposed settlement boundaries as well as AONB boundaries to allow for ease of comparison
- The East Devon AONB team state that in towns outside/abutting the AONB, 'preferred' allocations (green sites) outside the AONB should be prioritised and settlement boundaries adjusted to take account of such allocations should not include any new land within the AONB. ;In principle, they do not support the redrawing of town settlement boundaries to include AONB allocations but, if these sites are proposed under the regulation 19 publication of the draft plan, such sites should be only considered if they satisfy NPPF 177 and S85 of the CROW Act 2000 before the plan is made.
- With respect to Budleigh Salterton and villages within the AONB, the ED AONB team support prioritising 'preferred' allocations (green sites) that fall within existing settlement boundaries and any settlement boundaries adjusted to take account of such allocations should be only considered if they satisfy NPPF 177 and S85 of the CROW Act 2000 before the plan is made.
- Historic England note that the impact on heritage assets and their setting has been considered through a separate Historic Environment Site Assessment (HESA), which reflects Historic England guidance for selecting sites, based around a five-step process of assessment. This evidence was not available to consider, although a synopsis of the heritage assessments in the Site Selection Reports for Tier 1- 4 Settlements was given. These summaries are helpful, and in most respects this is a reasonable and proportionate level of evidence sharing, but for some sites there will clearly be an impact on the significance of designated heritage assets, and their setting, and HE need to

- In the Publication plan it is relevant to show just the proposed policy boundaries. Boundaries are to be drawn to include allocations, noting that some allocations do fall in AONBs.
- A percentage increase on existing settlement size is too simplistic and does not reflect evidence on land availability, environmental constraints, and facilities and services at the settlement.
- Heritage impacts are considered in the site assessment reports.
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<p>see the HESA and its 5 step heritage assessment in full. These requirements are set out for the relevant sites below.</p> <ul style="list-style-type: none"> • Housing Association planning consortium emphasises key messages from various Neighbourhood Plan consultations offering support from respondents for the delivery of more affordable housing. The frequency of the affordable housing issue being raised by residents is clear evidence that affordable housing delivery should be a high priority in the new Local Plan • Otter Valley Association support the hierarchy of settlements. They are concerned that many of the tier 3 and 4 settlements are historic villages and additional development may harm their rural character. A % increase would be more equitable as distribution is unequal. 	
<p>Further Regulation 18 consultation Spring 2024</p>	
<ul style="list-style-type: none"> • No ‘general issues’ raised in consultation that were relevant for this chapter. 	<ul style="list-style-type: none"> • No comments
<p>Commentary on policy redrafting for the Publication Plan</p>	
<ul style="list-style-type: none"> • Strategic Policy 25 – Development at Local Centres and Strategic Policy 26 – Development at Service Villages have been separated into individual settlements, so there is now an allocation policy for each settlement. This should make the plan easier to follow. 	

Axminster and its future development

Draft Plan consultation

Key issues raised in consultation:

- Axminster Town Council understand and accept the need for the building of housing and employment facilities in order to support the future growth of Axminster but do not consider that the plan contains a strategic approach. They are critical of the site assessment process, which they consider fails to take account of spare capacity and scope and funding for expansion. The Town Council consider that a disproportionately high proportion of housing is being allocated to Axminster without any new supporting infrastructure.
- Lyme Regis Town Council supports the Axminster designations and note the vital role that the town can play in meeting the housing needs of people working in west Dorset. The Town Council also references the number of visitor trips to Lyme Regis by private car and would like to discuss the potential for Axminster station and wider public transport to mitigate the impacts of this.
- The Environment Agency advise that the policy should include specific reference to the need for nutrient neutrality.
- Devon County Council (DCC) state that contributions towards education will be required – the lack of CIL funding from the previous plan for a new primary school at the strategic to the

Officer commentary in response:

General points

- Many of these general issues relate to a lack of infrastructure to support new housing development, such as transport, education, healthcare, sports pitches, and sewage disposal. These matters will be considered in the forthcoming Infrastructure Delivery Plan which will highlight key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan.
- It is recognised that Axminster has a high proportion of growth in relation to the scale of the town and compared to other Tier 2 settlements. This reflects the relatively unconstrained nature and supply of potential sites to the east and south of the town. Axminster also acts as the main hub for development in the eastern part of the plan area. Development levels are generally much lower in the east than in the west of the District, which will accommodate a new settlement, significant levels of development around Exmouth and to the east of Exeter.
- Nutrient neutrality, flooding and transport are dealt with elsewhere in the plan.
- Brownfield developments are included in the site allocations and supported through the plan policies.
- A separate appraisal of the impact of allocations on the national landscapes has been undertaken.

<p>east is not currently deliverable, so proposals have been developed to expand existing schools.</p> <ul style="list-style-type: none"> • DCC support development in Axminster given its high level of internalisation so supports reducing the need to travel large distances to access facilities – therefore suggest additional development at the town. • DCC support the removal of development around the northern end of the proposed Relief Road given issues with delivering the infrastructure. • DCC state congestion around the George Hotel will need to be addressed but public transport will be improved with the proposed half hourly rail service to Exeter. • DCC state the SUDS hierarchy should be applied, all off-site surface water discharges from development should mimic “greenfield” performance – see CIRIA SUDS manual and LLFA guidance. • South Somerset District Council consider housing levels to be disproportionate to the scale of Axminster and suggest this could result in additional traffic in the west of South Somerset. • Employment development welcomed. • As a large town it should have more houses, jobs and services • First and second choice sites seem well thought out but would need improvements to services and transport. • Several respondents felt that the level of housing growth proposed is disproportionate to size of town. • There has been sufficient construction in Axminster over the past 10 years. We do not need more housing. 	<ul style="list-style-type: none"> • The adopted local plan included allocations and a relief road to the east of the town and a subsequent masterplan showed how this could be delivered. Following changes to central funding mechanisms the scheme is not viable. • Aspirations for more affordable housing are noted, and requirements are included within Local Plan policy, subject to viability. <p>LP_Axmi_01a – Land off Musbury Road, Axminster (southern area) - <i>Proposed Employment Allocation</i></p> <ul style="list-style-type: none"> • The site is allocated for employment purposes, although the western portion of the site is required to be kept for open uses to protect the setting of the World War 2 pill boxes. <p>LP_Axmi_01b - Land off Musbury Road, Axminster (northern area)</p> <ul style="list-style-type: none"> • This site is not proposed for allocation, but is included in the settlement boundary. <p>LP_Axmi_02/08/09 Land East of Musbury Road</p> <ul style="list-style-type: none"> • Concerns about highway access, loss of countryside, impact on landscape, heritage assets and ecology are understood. However, these sites form an opportunity to provide 438 homes in a town with a good range of services and facilities. The site can be developed in a way that mitigates impacts and is supported. <p>LP_Axmi_07 - Axminster Carpets Factory Site</p> <ul style="list-style-type: none"> • Support for the redevelopment of the site is noted. A Strategic Flood Risk Assessment Level 2 shows that, whilst part of the site is at flood risk, there is potential for housing development in the north of the site. The site is proposed for a mixed-use redevelopment, supported by a
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<ul style="list-style-type: none"> • Proposed development sites would detract from appearance of town and surrounding countryside. • Relief road needed and housing should be built to the east to facilitate it. • Axminster would benefit from more social housing and affordable accommodation close to services, public transport and schools. • Infrastructure, services and employment should be in proportion to housing development. • Several respondents thought that traffic levels in town centre and other infrastructure must be addressed. • Axminster lacks infrastructure, road network health facilities, parking etc. to cope. • Several respondents favoured brownfield development before greenfield. • Spoiling beautiful places and won't be enough people from Axminster for 1000 homes. • More housing should be built here rather than in a new town. • Piecemeal development – new road should be considered separately from housing to fund it. • Level of development would exacerbate environmental problems including roads and river pollution. • Need to protect farmland so Axminster residents have access to locally produced food. • Too much building in Axminster already. • Axminster already overcrowded and needs no more homes. • East Devon AONB team request that Strategic Policy 19 be altered to include reference to the need for LVIA or landscape 	<p>Masterplan, to include employment uses, improved access links and environmental enhancements.</p> <p>LP_Axmi_10 - Scott Rowe Building, Axminster Hospital</p> <ul style="list-style-type: none"> • Concerns about the loss of health facilities are noted, but the site is suitable for housing if superfluous to its previous use. <p>LP_Axmi_11 – Whole site</p> <ul style="list-style-type: none"> • The site promoter's comments are noted, but the majority of this site is not considered to be suitable for allocation. <p>LP_Axmi_11a - Land on the south-east side of Axminster</p> <ul style="list-style-type: none"> • Support for development of the site is noted. The area concerned has been reduced to avoid flood risk. <p>LP_Axmi_12 - Land at Lea Combe</p> <ul style="list-style-type: none"> • Support for development and the need to protect trees notes and informs allocation policy. <p>LP_GH/ED/79 - Land east of Axminster</p> <ul style="list-style-type: none"> • Support for allocation noted. • The current planning application layout includes provision of a road to access land to the north (GH/ED/80). <p>LP_GH/ED/80a - Prestaller Farm, Beavor Lane</p> <p>A level 2 Strategic Flood Risk Assessment has been undertaken that shows that part of the site is at risk of flooding, but development is possible on part of the site.</p>
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<p>assessment to be provided for each site to assess the effect the proposals would have on the AONB.</p> <ul style="list-style-type: none">• Axminster is positioned between two AONB's and account needs to be taken of the effect on both any development proposed on the edges of Axminster will have.• National Highways anticipate that the A35 would be likely to be able to accommodate the level of growth proposed at Axminster, but expect a high-level transport assessment for the entire Local Plan.• If more homes are built more services and facilities will be attracted.• More homes needed to help Axminster thrive.• Criticism on behalf of one of the landowners for requirement for 1ha of employment land on sites GH/ED/79 and 80a because of character of surrounding area, landform, access issues, lack of public transport on Lyme Road and viability issues. Also not needed as employment only allocations being proposed in Axminster. However, there is support from the same landowner for a requirement for provision of a community hub building that can be used for a variety of uses including workspace, café, meeting rooms, etc, all falling within the wider E use class.• Number of dwellings on sites GH/ED/79 and 80a should be increased from 293 to 310 to reflect detailed assessment work shown in representations.• House builder commented that:• Axminster is a highly sustainable settlement with very good transport connections and a strong range of shops, services, and facilities.	<p>LP_GH/ED/80b - Prestaller Farm</p> <ul style="list-style-type: none">• This land is not considered suitable for built development and is excluded from the settlement boundary. <p>LP_GH/ED/81 - Land east of Axminster</p> <ul style="list-style-type: none">• Not proposed for allocation. <p>LP_GH/ED/82 - Land at Weycroft Manor Farm – Not considered to be a 'reasonable alternative'.</p> <p>LP_GH/ED/83 - Land at Chard Road, Axminster</p> <ul style="list-style-type: none">• There is a resolution to grant planning permission on this site.
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- Failure to deliver strategic site in adopted local plan means there is a current deficit in land supply and a need to allocate more to address future need.
- Opportunity to balance out distribution strategy focussed on western side of East Devon.
- Potential to meet housing needs of Lyme Regis.
- At least 1000 homes should be allocated.
- Town centre suffers from a loss of critical mass and needs additional population.

- Nb. Devon County Council's consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.

- **Axminster Neighbourhood Plan Survey**
- The Axminster Neighbourhood Plan Steering Group circulated to residents relevant extracts from the draft plan and summarised the Steering Group response on a small number of issues and proposed allocations. Residents were invited to indicate whether they agreed with the response or not and were invited to raise any other comments. Around 40 completed surveys were submitted during the local plan consultation. The Steering Group comments and responses received in the survey are briefly summarised below.
- Infrastructure – There is a critical need for infrastructure before building new homes, but the proposed relief road has

not been delivered and hundreds of new homes have been built without infrastructure. Local roads are overloaded, and health and education facilities are struggling to cope with the current population, let alone a major expansion. All the survey responses where a preference was expressed supported this analysis.

- Accessibility – A sites accessibility should not be assessed just by measuring 1,600 in a straight line but should include the actual walking distance plus consideration of slopes and pavement quality. All the survey responses where a preference was expressed supported this analysis.
- Density – The Steering Group believe that housing densities should be delivered in line with the National Model Design Code and that any proposals for less than 30 dwellings per hectare (dph) should not be considered. The default target for Axminster should be 40 dph. The majority of respondents supported this approach some would prefer lower densities, particularly outside of the town centre.
- Housing Allocations – The Steering Group believe allocating a further 1,050 dwellings is disproportionate to the town’s ability to absorb new residents and is out of proportion to what is planned for other East Devon towns. The vast majority of respondents agree with the Steering Group, although one person commented that a Tier 2 settlement should be prepared for growth if supported by infrastructure, services and facilities.
- GH/ED/79 - principle of development accessed from Lyme Road without relief road is acceptable. A majority of

<p>respondents supported this view, but some did not, citing the lack of a relief road, flooding and highway safety as concerns.</p> <ul style="list-style-type: none">• <u>GH/ED/80a</u> - The Steering Group commented that providing effective flood mitigation will be difficult and access from Sector Lane would be unacceptable. It felt that the closure of Sector Lane proposed through the relief road would be impractical and the steep slope would make pedestrian and cycle access difficult. All but one respondent agreed with several expressing concerns about flooding and highway access.• <u>GH/ED/82</u> - concerns were raised about the additional HGV traffic on Weycroft Bridge and impacts on the adjacent stream together with the need to manage the relationship with the important group of listed buildings to the north. The vast majority of respondents agreed with the comments and even those who said they did not commented on additional traffic congestion, pollution, flooding, archaeological impact and potential impacts on listed buildings.• <u>GH/ED/83</u> - land south of Tiger Way should not be allocated for housing but may be suitable for food retail to ease town centre congestion and serve local residents better. Land north of Tiger Way is less suitable for development because of its distance from the town centre. Respondents generally supported these comments, but some did not support any kind of development.• <u>Axmi_01a</u> – was considered to be suitable for employment. This was largely supported, although a respondent queried what sort of employment would be provided.	
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- Axmi 02&08 – Sites are considered to lie beyond a clear natural boundary and could lead to more housing beyond if developed. Safe pedestrian access to Musbury Road cannot be provided and accessing the town via Wyke Lane involves steep slopes and a long walk so future residents would be car reliant. The sites form attractive countryside visible from the AONB, good agricultural land and well used for recreation. Most respondents agreed.
- Axmi 07 – allocation of site welcomed are would be preferred for higher density housing rather than employment. Consideration should be given to improved pedestrian/cycle links across the site and a road connection from the by-pass slip road to the train station. Only one respondent expressed a contrary view.
- Axmi 09 – site is indistinguishable from the AONB landscape and would be a car based satellite suburb. Considered to be the least defensible site for development. No respondents supported development of the site.
- Axmi 10 – site is being marketed for housing and may be suitable for 3 – 4 storey buildings. Some respondents supported housing development, but a significant minority wanted it kept for community use.
- Axmi 11a – Large site with best access to the town and opportunities to provide flood mitigation to ease pressure on the Purzebrook. Support for high density affordable housing. A significant number of respondents were opposed to development for reasons including impact on setting of school, increased traffic and flooding. There was also support

<p>for development, with a majority supporting the steering group comments.</p> <ul style="list-style-type: none">• <u>Websters Garage</u> – The Steering Group thought that this site should be allocated for development to encourage its use. Most respondents agreed and were keen to see something happen soon, although several expressed concerns about lack of car parking.• <u>Millway Rise Football Field</u> – Site is not allocated in the plan, but a separate EDDC document proposed a modest number of affordable homes at low density. The Steering Group feels that if affordable housing is to be built it should be at least 50 homes, but a new food store is preferred, possibly with affordable housing as well. The majority of respondents agreed, but some were concerned about loss of green space.• LP_Axmi_01a – Land off Musbury Road, Axminster (southern area) - <i>Proposed Employment Allocation</i>• Representation on behalf of land owner includes a concept plan showing around 6,000 square metres of employment floorspace with more achievable if two or more stories allowed. Benefits of the scheme are listed as flood storage in the central part of the site with public access, biodiversity net gain and retention of heritage assets.• The Environment Agency state that area at risk of flooding to the northern boundary should be set aside for green infrastructure with at least an 8-metre buffer from the watercourse free from development.• Land of Musbury Road (site Axmi_01) has been split into a southern area (a) and a northern area (b).	
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- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- National Highways expect further discussion on this site as it is adjacent to the A35 or could affect the A35 through access arrangements.
- Devon County Council suggest this site should be allocated given the relatively short distances to a range of facilities.
- **LP_Axmi_01b - Land off Musbury Road, Axminster (northern area) - *Rejected Site***
- Axminster Town Council supports the employment allocation.
- Representation on behalf of land owner includes a concept plan showing around 12 homes accessed from Abbey Close. Benefits of the scheme are listed as flood storage in the central part of the site with public access, biodiversity net gain and retention of heritage assets.
- North-western boundary of site supports a large colony of Common Lizards (*Zootoca vivipara*). This species is protected under the Wildlife and Countryside Act and it is also a “Priority Species” under the UK post-2010 Biodiversity Framework. Any development on the south-western boundary would need to consider their possible presence. Specialist wildlife advise is needed.
- Site could potential be better used as an industrial space with access to A35 ... reducing the flood plain capacity and usage.

- With the flooding potential and the architecture, I feel this is not a suitable site to develop. However, if it is only used for employment purposes and current improvement to infrastructure is considered to ensure large vehicles/too many vehicles are not needing to disrupt the people living there then it could be OK.
- Any development of this site would have adverse impact on AONB due to proximity.
- Don't need any more housing.
- Would be better as industry.
- Not suitable for development due to flooding and architecture.
- May be alright for employment if not too many or too large vehicles.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- National Highways expect further discussion on this site as it is adjacent to the A35 or could affect the A35 through access arrangements.
- Devon County Council suggest this site should be allocated given the relatively short distances to a range of facilities.
- **LP_Axmi_02 - Land North of Shoals, Musbury Road, Axminster - Preferred Allocation**

- Axminster Town Council is concerned that the site lies beyond a long-established and clear natural boundary and development would act as a bridgehead for further housing. They are concerned that there is no safe access to the town along Musbury Road and access via Wyke Lane involves steep slopes and a long distance so that future residents are likely to walk. The site is attractive countryside, visible from the AONB, is good agricultural land and used for recreational walking. Environmental mitigation would reduce the number of homes that could be delivered.
- The Environment Agency state that areas at risk of flooding to the southern boundary should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- Representations on behalf of prospective house builder state that this site should be considered as one with Axmi_08 and Axmi_09. Technical reports on geotechnical, contamination, infrastructure, landscape, ecology and historic environment show sites are deliverable.
- Good job opportunities for locals.
- Probably the best site for homes in the area.
- Priority should be given to brownfield sites.
- Overdevelopment
- A number of respondents raised concern about the archaeological importance of the site including its close proximity to a Romano British village, Fosse Way and Saxon and Roman finds.

- A number of respondents lamented the loss of green space used for recreation and important for mental health.
- Some respondents were concerned about the loss of agricultural land.
- Lack of infrastructure and services.
- Additional traffic will cause pollution and congestion.
- Would cause traffic problems because Woodbury Lane is not wide enough for two-way traffic.
- Pedestrian access to the town is limited.
- Flooding from tributary to River Axe.
- Should develop sites closer to town centre.
- Site lies beyond clear natural boundary.
- Loss of attractive countryside visible from AONB.
- Given gradients and distance from town centre most trips are likely to be by car.
- A number of respondents raised concerns about access to Musbury Road.
- Loss of nature interest.
- Impact on bats.
- Loss of hedges.
- Loss of amenity for neighbouring housing.
- Water table of River Axe has already been damaged by too much house building.
- Houses will be affected by noise from A.35.
- Mains service could be affected by digging.
- More houses not needed in Axminster.

- National Highways expect further discussion on this site as it is adjacent to the A35 or could affect the A35 through access arrangements.
- **LP_Axmi_07 - Axminster Carpets Factory Site, Woodmead Road, Axminster - Preferred Allocation**
- Axminster Town Council welcome inclusion of the site as it is well connected to the town and could improve access from Gamberlake Cross. The Town council would like to see much of the site redeveloped for higher density housing rather than employment.
- The Environment Agency state that a Strategic Flood Risk Assessment Level 2 will be needed for this allocation including sequential and exceptions tests. If it passes, a masterplan will be needed to secure environmental and other enhancements, including opening the culverted watercourse to create a natural blue green nature corridor. The SFRA2 could identify opportunities to reconfigure the current area at risk of flooding, ideally to achieve an overall improvement. Would also need to remediate contaminated land.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- There was support for this site allocation with comments including:
 - Several respondents felt that it would be a good use of brownfield site.
 - A couple of respondents noted that the site is close to public transport.
 - Close to town.

- Good place for affordable housing.
- Junction of Woodmead Road is unsuitable for additional traffic.
- Town centre already difficult to drive through.
- No proper access road to site and heavily congested by existing businesses.
- **LP_Axmi_08 - Land off Wyke Lane, Axminster - Preferred Allocation**
- Axminster Town Council is concerned that the site lies beyond a long-established and clear natural boundary and development would act as a bridgehead for further housing. They are concerned that there is no safe access to the town along Musbury Road and access via Wyke Lane involves steep slopes and a long distance so that future residents are likely to walk. The site is attractive countryside, visible from the AONB, is good agricultural land and used for recreational walking. Environmental mitigation would reduce the number of homes that could be delivered.
- The Environment Agency state that areas at risk of flooding to the southern boundary should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.

- Representations on behalf of prospective house builder state that this site should be considered as one with Axmi_02 and Axmi_09. Technical reports on geotechnical, contamination, infrastructure, landscape, ecology and historic environment show sites are deliverable.
- Not close to transport link and would cause greater pollution, climate change and road congestion.
- Site remote and would need car to access essential services.
- Open countryside beyond long established and natural boundary.
- Visible from AONB.
- Loss of recreational walking area important for mental health.
- Huge impact on local amenities.
- Additional traffic on Woodbury Lane, which has dangerous access to Lyme Road.
- Greenfield site would harm wildlife and increase runoff to other land including A35 junction.
- Woodbury Lane and Wyke Road are narrow and constrained by parked cars.
- Greenfield site should be used for food production.
- Flood risk to properties on lower land.
- Lack of infrastructure.
- National Highways expect further discussion on this site as it is adjacent to the A35 or could affect the A35 through access arrangements.
- **LP_Axmi_09 - Great Jackleigh Farm, Axminster - Potential 'Second Best' Allocation**

- Axminster Town Council feel that the considerations that apply to Axmi_02 and Axmi_08 apply to this site. In addition, the distance from the town would result in a car dependent satellite suburb where residents would shop in Seaton so that countryside would be traded for housing that could go elsewhere. The situation could be improved if these three sites had their own facilities such as school, shop and GP surgery.
- The Environment Agency state that areas at risk of flooding associated with the watercourse that bisects the site should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- Representations on behalf of prospective house builder state that this site should be considered as one with Axmi_02 and Axmi_08. Technical reports on geotechnical, contamination, infrastructure, landscape, ecology and historic environment show sites are deliverable. Site should be included as a preferred allocation,
- Would destroy rural charm of Devon lanes and ditches.
- Increase in traffic.

- Loss of walking areas.
- Open countryside beyond long established and natural boundary.
- Visible from AONB.
- A few respondents felt it would lead to the loss of recreational walking area important for mental health.
- Lack of services and facilities.
- Loss of greenery and wildlife.
- Infrastructure cannot cope.
- Loss of greenfield site.
- Loss of trees and hedgerows.
- A few respondents mentioned increased flooding.
- Landscape same quality as AONB.
- Likely to shop in Seaton.
- Too far out of town.
- Prime agricultural land should be kept for food production.
- Would need car to access town centre.
- National Highways expect further discussion on this site as it is adjacent to the A35 or could affect the A35 through access arrangements.
- **LP_Axmi_10 - Scott Rowe Building, Axminster Hospital, Chard Street, Axminster - Preferred Allocation**
- Axminster Town Council regret the loss of any facilities on the hospital site, but acknowledge that it is being marketed for residential use. It supports higher density housing, possibly 3-4 storeys high.
- Need to keep hospital to be reopened.

- A few people thought it should be kept for health or social care – even more important with town expansion.
- Land was given to the town for health purposes and should not be used for financial gain of developers.
- Bungalows better than flats but should be kept for health or social care.
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- **LP_Axmi_11 – Whole site – All comments from site promotor**
- Whole site should be identified as a ‘first choice’ for allocation (the draft plan proposes 11a as a second choice and rejects 11b).
- Inconsistencies in evidence base (including the draft Strategic Environmental Assessment) and consider that an objective analysis and comparison of site options has been undertaken.
- Landscape sensitivities and proximity to Scheduled Ancient Monument have more of an impact on other sites that are preferred choices.
- Site could provide at least 250 homes with open space and deliver appropriate mitigation.
- Highway access can be provided from Lyme Road with a secondary access achievable from Lyme Close if necessary.
- Site is not suitable for employment or older persons housing and not expected that there would be a demand for either.
- **LP_Axmi_11a - Land on the south-east side of Axminster - Potential ‘Second Best’ Allocation**

- Devon County Council, as landowner, supports allocation as site is close to town centre, has good access to local facilities and transport options.
- Axminster Town Council consider this to be the best large site for access to the town centre. It would offer opportunities to build in flood mitigation measures to relieve flooding on the Purzebrook and the Town Council support high density affordable housing on the site.
- The Environment Agency state that areas at risk of flooding associated with the watercourse on site should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development. Given the history of flooding to property downstream, development should seek to provide a reduction in risk.
- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.
- Site promoters state that site is suitable and deliverable for at least 250 homes with sizeable open space.
- Site has potential and is close to amenities of town, although wet at the lower edge.
- Flooding of Phillips Court, Lea Combe and Purzebrook.
- Several respondents mentioned that the fields are used by dog walkers.
- Air noise and light pollution. Increased traffic congestion.
- Give priority to wildlife.
- A couple of respondents mentioned inadequate access.
- A couple of respondents were concerned about the loss of natural context for school.

- Oak tree must be preserved.
 - Preserve all boundary trees.
 - Increased runoff.
 - Should combine with Axmi_12 but go no further south than fire station.
 - Partly on flood plain.
 - Beautiful area.
 - Will cause disturbance to the school.
 - Steep gradient.
 - Will add to river pollution.
 - Road congestion and poor access.
 - **LP_Axmi_11b - Land on the south-east side of Axminster - *Rejected Site***
 - Site promoters state that site is suitable and deliverable for at least 250 homes with sizeable open space.
 - Will push traffic onto Woodbury Lane.
 - Unsuitable for development due to access and flooding risk.
 - Brownfield sites should be developed before greenfield.
 - Loss of trees.
 - Should be school and community garden.
- LP_Axmi_12 - Land at Lea Combe, Field End, Axminster - *Preferred Allocation***
- Devon County Council, as landowner, supports allocation as site is close to town centre, has good access to local facilities and transport options.
 - Loss of natural habitat.
 - Close to congested junction.

- Additional pollution and town centre already saturated.
 - Tree Preservation Order would need to be maintained.
 - Combine with 11a to link to rear of fire station but all trees should be preserved.
 - Linked with 11a would make use of a field that has done nothing for years.
 - Could be part of internal bypass, which would be a good idea.
- LP_GH/ED/79 - Land east of Axminster - Preferred Allocation**
- Axminster Town Council accept the principle of development on the site.
 - Representation on behalf of the land owner state that:
 - A planning application is being progressed and the site is deliverable;
 - The wording of draft policies present a potential burden to development and should
 - be reconsidered to improve flexibility and deliverability of development;
 - Recommend that the sentence ‘The endorsed Axminster Masterplan provides guidance for how this site should come forward’ be removed as the masterplan is obsolete.
 - Lack of infrastructure.
 - Town centre congestions.
 - Several respondents were concerned about flooding.
 - River pollution.
 - Need a relief road so no housing should block line of proposed road.
 - Natural beauty

- A couple of respondents lamented the loss of wildlife including foxes, deer and birds of prey.
- Several respondents commented that Lyme Road is unsuitable for additional traffic due to congestion.
- Taking account of gradient this is the best option for Axminster growth, but only suitable for access from Lyme Road.
- Access to Lyme Road would be dangerous.
- Would only be accessible by private car.
- Better kept for agriculture if no relief road.
- Good to have access from Lyme Road.
- Loss of greenspace and lack of infrastructure.
- Other sites have safer access and are closer to the town centre for families to walk.

LP_GH/ED/80a - Prestaller Farm, Beavor Lane, Axminster - Preferred Allocation

- Axminster Town Council note that much of the site is very steep and providing effective flood mitigation will be challenging. The Town Council consider that access from Sector Lane is unacceptable and access via site GH/ED/79 would be in practical.
- The Environment Agency state that areas at risk of flooding to the northern and eastern boundaries should be set aside for green infrastructure with at least an 8 metre buffer from the watercourse free from development.
- Devon County Council (DCC) state this site has been impacted by surface water/ordinary watercourse flooding.

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| <ul style="list-style-type: none">• DCC note this site is located within Axminster Critical Drainage Area.• Representations on behalf of landowner proposed deletion of the 1ha of employment allocation and assert that the site is capable of being brought forward and delivered within the Plan without the need for the relief road as originally envisaged.• The Crown Estate own some 31 hectares of land of which only around 12ha is a proposed allocation for mixed use. While not proposing any additional land for development, a vision has been put forward for the whole land ownership to include (on GH/ED/80a) around 225 new homes; a community hub providing workspace, café, meeting space; 1.66ha open space, green infrastructure; new pedestrian /cycle links; and vehicular access to the south off Lyme Road through GH/ED79. Outside of the proposed allocation 19.82ha is proposed for BNG, tree planting, phosphate nutrient mitigation, community orchards and publicly accessible open space.• Town congested with no relief road.• Will exacerbate flooding.• Will exacerbate river pollution.• Would sterilise bypass.• Sloping ground better for wildlife and unsuitable for housing.• There are better areas for housing so no need to cram around Axminster.• Loss of land for walkers.• Loss of wildlife. | |
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- Increased runoff where hedgerows and trees are removed.

LP_GH/ED/80b - Prestaller Farm, Beavor Lane, Axminster - *Rejected Site*

- Land south of Beavor Lane inappropriate but land to north could be suitable for a mix of residential and employment.
- DCC note this site is located within Axminster Critical Drainage Area.

LP_GH/ED/81 - Land east of Axminster - *Rejected Site*

- Why has the relief road been considered unviable? It is vitally needed infrastructure because heavy traffic is killing the town – vibrations from heavy vehicles shake buildings in the town centre.

LP_GH/ED/82 - Land at Weycroft Manor Farm - *Proposed Employment Allocation*

- Axminster Town Council are concerned about additional HGV movements on Weycroft Bridge and in the town centre. It is also concerned about the impact of development on the adjacent stream and consider that any narrowing of the gap between Axminster and the Grade I listed Weycroft Hall needs to be very carefully managed.
- The Environment Agency state that areas at risk of flooding to the northern part of the site should be set aside for green infrastructure with at least an 8-metre buffer from the watercourse free from development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can

be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. 82, and 83 appear particularly challenging mindful that you, and the SA, consider development would cause considerable harm to the significance of the Weycroft heritage assets; which questions their suitability in principle.

- Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.

LP_GH/ED/83 - Land at Chard Road, Axminster - Preferred Allocation

- Axminster Town Council understand the logic of allocating land south of Tiger Way but believe that no more housing should be allocated to the north of Axminster without better food retail provision to relieve town centre traffic congestion and better serve existing residents. The Town Council regard land north of Tiger Way to be less suitable for development, partly due to the distance from the town centre.
- The Environment Agency state that flood risk should be included in the policy wording, a buffer included to avoid supporting habitat to the River Axe SAC and provide biodiversity net gain.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act

<p>1990. 82, and 83 appear particularly challenging mindful that you, and the SA, consider development would cause considerable harm to the significance of the Weycroft heritage assets; which questions their suitability in principle</p> <ul style="list-style-type: none">• Devon County Council state this site has been impacted by surface water/ordinary watercourse flooding.• DCC query whether this site needs to drain into the existing Vistry/Linden Homes site and, if so, has this been accounted for.• Site promoter has developed a masterplan to show 0.8 ha of employment land for Class E to ensure compatibility with housing, and 120 homes at 35 dph. It is suggested that, unless a higher density is considered appropriate, the policy wording should be amended to reflect this.• Logical place to extend and recent development has a bus link.• Ridiculous sprawl resulting in loss of open area and footpaths.• Several respondents expressed concern about an increase in river pollution.• Several respondents were concerned about loss of space for walking.• Some respondents were concerned that development would increase flooding.• Loss of wildlife when trees and hedges are removed.• Loss of barrier to Weycroft that has a notable local character.• Site is next to a single track historic river bridge that is impossible to widen or extend or bypass.	
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<ul style="list-style-type: none"> • No shops nearby. • Land south of Tigers Way suitable for development but nor to the north as too close to historic buildings and Weycroft Bridge. • Too far to walk into town. • More traffic on busy road. • Town centre already congested. • Land not suitable for building as too close to river. • Impact on wildlife in river. • Any new build housing is unaffordable for local people. • Loss of archaeological interest. <p>Omission sites at Axminster</p> <ul style="list-style-type: none"> • Axminster Town Council ask that sites Axmi_15, Axmi_16, Axmi_17, Axmi_18, Axmi_19, Axmi_20, Axmi_22 are considered together with the Webster’s Garage site. • Land West Of Prestaller Farm Beavor Lane - a planning application for 29 dwellings on this land is currently under consideration 21/3025/MFUL. The agent states that the Highway Authority have no objection to the application and that drainage and landscape improvements are under consideration to improve the scheme. It is asked that the settlement boundary be extended to include this land. 	
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>Axmi_16 – The Co-Operative Food, West Street – <i>Rejected site</i></p> <ul style="list-style-type: none"> • Key issues raised in consultation: 	<ul style="list-style-type: none"> • Axmi_16 – The Co-Operative Food, West Street is not proposed for allocation:

- The responses to the question about site Axmi_16 not being allocated express a range of perspectives. While some commenters support the non-allocation decision, citing concerns about infrastructure capacity and the need to preserve commercial uses in the town centre, others argue that the site's brownfield status makes it suitable for residential redevelopment. There are also calls for a balanced approach that considers the wider needs of the growing Axminster community.

Key points raised, in order of frequency:

- Infrastructure and Service Capacity Concerns
- Doubts about the ability of Axminster's infrastructure, including roads, schools, and public transport, to support additional housing development
- Worries that the town has already reached a saturation point for new housing
- Importance of Retaining Commercial Uses
- Views that the site should remain in commercial use to support the town centre and local amenities
- Concerns about the loss of important facilities like the Co-op store
- Support for Residential Redevelopment of Brownfield Sites
- Belief that brownfield sites like Axmi_16 are suitable for housing development
- Potential for the site to provide much-needed affordable housing
- Calls for a Balanced Approach

Axmi_17 – Land at Millwey, Chard Road

- A level 2 Strategic Flood Risk Assessment demonstrates that the site can be successfully developed.
- The provision of alternative playing pitches is included in the relevant allocation policy.

Axmi_18 – Millwey Garages, St Andrews Drive

- General support for allocation welcomed and concerns regarding detailed design and layout can be considered through development management process.

Axmi_23 – Websters Garage, 9 Lyme Street

- General support for allocation welcomed and concerns regarding historic setting and design can be dealt with through development management process.

Axmi_24 – Land West of Prestalier Farm

- The strategic flood risk showed that only a small part of the site is at risk of flooding and this area should not be developed.
- Other issues can be addressed through the relevant policies and the development management process.

- Acknowledgment of the need to consider the wider benefits and impacts of development allocations
 - Suggestions that Axminster has already experienced a high level of housing growth
- Statutory organisations summary**
- Natural England
 - The SEA correctly states that all Axminster sites fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.
 - Environment Agency
 - All allocations at Axminster should include policy wording to demonstrate nutrient neutrality.
 - Devon County Council
 - The site already has a high established trip generation from its current use, with good road access and sustainable travel options.
 - There may be archaeology potential, and design should recognise the sensitive historic environment as a ‘gateway’ site.
 - Primary and secondary school contributions would be required, noting the new primary school in the eastern urban extension is not currently considered deliverable.
 - Existing buildings on-site means there is potential for the creation of inert material during construction, which should be

<p>considered in the layout, design and levels of any development.</p> <ul style="list-style-type: none">• NHS Integrated Care Board• The GP practice has sufficient capacity to accommodate the 64 dwellings proposed <p>Axmi_17 – Land at Millwey, Chard Road – Preferred allocation</p> <ul style="list-style-type: none">• The responses to the question about allocating site Axmi_17 in Axminster reveal mixed opinions, with concerns about environmental impact and infrastructure capacity balanced against recognition of the site's potential for development. Many respondents emphasize the importance of preserving green spaces within urban areas, while others see the site as a suitable location for housing due to its proximity to existing infrastructure. There are also calls for any development to prioritize affordable housing and local needs. Concerns about flooding and the loss of recreational facilities are recurring themes.• Key points raised, in order of frequency:• Preservation of green spaces and environmental concerns• Importance of maintaining urban green spaces for biodiversity and flood management• Concerns about loss of wildlife habitats and environmental impact• Infrastructure and town capacity• Worries about existing infrastructure's ability to support more development	
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<ul style="list-style-type: none">• Need for improved facilities (e.g., doctors, dentists) to support growth• Support for development with conditions• Recognition of the site's potential for housing due to location and access• Calls for development to prioritize affordable housing or local needs• Flooding concerns• Mentions of the site's propensity to flooding• Importance of green spaces as natural flood management• Recreational facilities and open spaces• Concerns about loss of recreational areas• Suggestions to partially develop while maintaining some open space• Traffic and accessibility• Concerns about increased traffic through town centre• Recognition of good road access and proximity to transport links• Archaeological considerations• Mention of site's archaeological potential and historical significance• Alternative development suggestions• Proposals to use the site for allotments or tree planting• Suggestions to focus on brownfield sites instead• Local authority ownership considerations• Potential for site to address local housing issues due to council ownership• Concerns about overdevelopment	
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- Perception of Axminster as already experiencing significant development
- Calls to consider development in other areas

Statutory organisations summary

Natural England

- The SEA correctly states that all Axminster sites fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.
- Historic England
- Recommend seeking the advice of the County Archaeologist on the acceptability of development, given the site formed part of a WWII Military Hospital.
- Environment Agency
- Note all allocations at Axminster should include policy wording to demonstrate nutrient neutrality.
- State a small area of flood risk crosses the site which will need to be assessed, and sequential test considered.
- Devon County Council
- All allocations at Axminster should include policy wording to demonstrate nutrient neutrality.
- The site has good highway access.
- The site lies in an area of known high archaeological potential, so any planning application should be informed by archaeological investigations.

- Primary and secondary school contributions would be required, noting the new primary school in the eastern urban extension is not currently considered deliverable.
- Developing the site could create inert material that should be considered in the layout, design and levels of any development.
- NHS Integrated Care Board state
- The GP practice has sufficient capacity to accommodate the 64 dwellings proposed.
- Somerset Council
- No objection but note the potential impact of additional traffic generation to employment areas at Chard because of planned growth at Axminster and the requirement for phosphate mitigation in the River Axe Catchment Area.
- **Axmi_18 – Millwey Garages, St Andrews Drive – Preferred allocation**
- The responses to the question about allocating site Axmi_18 are mixed, with a slight lean towards support for the allocation. Those in favour view it as a suitable infill development in an existing built-up area, while those against raise concerns about access and the limited scale of development. Some respondents emphasise the need for affordable housing and local resident prioritisation if the site is developed.
- Key points raised, in order of frequency:
 - Suitable infill development
 - Good location within existing built-up area
 - Preferable to developing greenfield sites

<ul style="list-style-type: none">• Concerns about access and infrastructure• Poor access to the site• Potential increase in vehicle traffic• Affordable housing needs• Preference for social housing or affordable homes for local residents• Limited scale of development• Site doesn't provide significant housing or infrastructure benefits• Archaeological considerations• Former WW2 military hospital site, likely disturbed• Design considerations• Need for sympathetic design considering impact on neighbouring properties• Statutory organisations summary• Natural England• The SEA correctly states that all Axminster sites fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.• Historic England• Recommend seeking the advice of the County Archaeologist on the acceptability of development, given the site formed part of a WWII Military Hospital.• Devon County Council	
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- State the access route is a slight bottle neck which may not be suitable for a larger development but may be engineered suitable for a smaller scale mixed use site.
- The site lies in an area of known high archaeological potential, so any planning application should be informed by archaeological investigations.
- DCC state primary and secondary school contributions would be required, noting the new primary school in the eastern urban extension is not currently considered deliverable.
- DCC note developing the site could create inert material that should be considered in the layout, design and levels of any development.
- NHS Integrated Care Board
- The GP practice has sufficient capacity to accommodate the 64 dwellings proposed.
- Somerset Council
- No objection but note the potential impact of additional traffic generation to employment areas at Chard because of planned growth at Axminster and the requirement for phosphate mitigation in the River Axe Catchment Area.
- **Axmi_23 – Websters Garage, 9 Lyme Street – Preferred allocation**
- The responses to the question about allocating site Axmi_23 are generally positive, with most respondents supporting the development of this brownfield site in the heart of Axminster. Many view it as an opportunity to improve the town centre's appearance and make better use of an underutilised space. However, there are some concerns about the impact on local

<p>infrastructure and the need for sensitive design given the site's historic location.</p> <ul style="list-style-type: none">• Key points raised, in order of frequency:• Support for brownfield development• Preference for developing existing urban sites over rural areas• Opportunity to improve an "eyesore" in the town centre• Mixed-use development potential• Suggestions for retail, leisure, and housing mix• Opportunity for creative town centre regeneration• Archaeological and historical considerations• High potential for archaeological deposits• Need for sensitive design and archaeological assessment• Housing type preferences• Suggestions for social housing or warden-controlled accommodation• Benefits of central location for elderly and disabled residents• Design considerations• Emphasis on high-quality design due to prominent location• Need for sensitivity to historic surroundings• Increase density• Parking and access concerns• Suggestions to retain some parking for town centre use• Concerns about access to the site• Alternative development ideas• Suggestion for green space and recreational area instead of housing• Infrastructure concerns	
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- Doubts about Axminster's ability to support more housing
- **Statutory organisations summary**
- Natural England
- The SEA correctly states that all Axminster sites fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.
- Historic England
- Note the presence of heritage assets (Conservation Area, listed buildings) but do not object provided suitable criteria is included to conserve and enhance heritage assets. However, the vehicular access should be from Lyme Street to the north to avoid impacts on Grade II listed buildings.
- Environment Agency
- Note an area of surface water flood risk crosses the entrance to the site, which will need to be assessed.
- Devon County Council
- The site has two possible road connections, the site is large for Axminster centre but sustainable travel options may reduce vehicle trip generation.
- The site lies in an area of known high archaeological potential, so any planning application should be informed by archaeological investigations.
- State primary and secondary school contributions would be required, noting the new primary school in the eastern urban extension is not currently considered deliverable.

- Developing the site could create inert material that should be considered in the layout, design and levels of any development.
- NHS Integrated Care Board
- state the GP practice has sufficient capacity to accommodate the 64 dwellings proposed.
- Somerset Council
- No objection but note the potential impact of additional traffic generation to employment areas at Chard because of planned growth at Axminster and the requirement for phosphate mitigation in the River Axe Catchment Area.

Axmi_24 – Land West of Prestalier Farm – Preferred allocation

- The responses to the question about allocating site Axmi_24 are mixed, with significant concerns raised about environmental impact, infrastructure capacity, and flood risk. While some respondents view it as a relatively sustainable option compared to more rural sites, others emphasise the importance of preserving green spaces and protecting the local ecosystem. There are also calls for careful consideration of the overall development strategy for Axminster.
- Key points raised, in order of frequency:
 - Environmental concerns
 - Loss of valuable green space and biodiversity
 - Proximity to River Axe Special Area of Conservation
 - Impact on local wildlife and ecology
 - Flood risk and drainage issues
 - Poor drainage and steep slopes

- Site located on a flood plain
- Infrastructure concerns
- Doubts about Axminster's ability to support more housing
- Need for increased school and GP capacity
- Traffic and road infrastructure issues
- Relatively sustainable location
- Good site location with nearby facilities
- More sustainable than rural sites
- Increase density
- Agricultural land preservation
- Concern about impact on nearby farm and food security
- Archaeological considerations
- Potential for archaeological finds, need for evaluation
- **Statutory organisations summary**
- Natural England
- The SEA correctly states that all Axminster sites fall within the River Axe Nutrient Management Zone. The LPA should be adequately confident that mitigation measures are deliverable and so the proposed development is viable. Suitable mitigation measures should be discussed in the SEA and detailed in the site allocation policies.
- Site is close to the Blackdown Hills AONB
- Environment Agency
- The site is partly within flood zone 3, which will need to be assessed, and sequential text considered. Also located in Axminster Critical Drainage Area. The ecology section should mention the stream on the southern boundary, which should be protected and enhanced.

- Devon County Council
- Some of this site is being safeguarded for the long-term aspiration of Axminster Relief Road, so any development should work with Devon County Council to support/deliver this section of the relief road.
- DCC note the site has a sloping topography that could create inert material that should be considered in the layout, design and levels of any development.
- DCC state primary and secondary school contributions would be required, noting the new primary school in the eastern urban extension is not currently considered deliverable.
- NHS Integrated Care Board
- The GP practice has sufficient capacity to accommodate the 64 dwellings proposed.
- Somerset Council
- No objection but note the potential impact of additional traffic generation to employment areas at Chard because of planned growth at Axminster and the requirement for phosphate mitigation in the River Axe Catchment Area.
- South West Water
- Waste Water Treatment Infrastructure- Not expected to require significant upgrades to the network or treatment process.
- Waste Water network / Sewer Infrastructure - Not expected to require significant upgrades to the network or treatment process.
- Water Infrastructure - Likely to need upgrades to the water distribution network along Beavor Lane.

Exmouth and its future development

Draft Plan consultation

Key issues raised in consultation:

- There were a number of general concerns that were raised in respect of development at Exmouth. There were also concerns raised in individual site comments that could be seen to apply to many sites (to some degree perhaps all sites) that are shown as proposed allocations and the main themes in these and more general comments that were in objection to development (in general or specific sites) are summarised below:
- There were many respondents expressing the view of a concern of overdevelopment in Exmouth
- A lot of respondents suggested that further development should be small scale using brownfield sites;
- A number of respondents were of the view that new development should increase the density of the existing built form and not spread outward into countryside areas;
- Loss of greenfield sites to development was a common theme in site specific objections to the draft local plan;
- The North East Exmouth Residents Group request that plan production be paused until Government clarify the changes to the housing requirements. They consider that the new town should be the main focus for new growth and the amount of housing directed to Exmouth and Lympstone reduced on the basis of

Officer commentary in response:

- The spatial strategy of the plan sets Exmouth out as a tier 1 settlement and as such a location that is appropriate for higher growth levels. This factor, taken in conjunction with the need to accommodate high levels of new housing (in particular) in East Devon, makes Exmouth an appropriate town to accommodate higher growth levels.
- It is recognised that many development sites in Exmouth will inevitably have to be at the periphery of the town.
- We have considered the potential for brownfield development in the town but suitable and achievable sites are limited in supply. Limitations on credible site choices limit scope to increase density of built development in the town. Lack of brownfield options inevitably has resulted in need for Greenfield allocations.
- The new town will accommodate a large part of the development needs of East Devon, this does not, however, negate the need for development elsewhere, noting positive benefits that development can deliver.
- Open market homes will be sold at market prices, noting that there is net in-migration into East Devon. However, on larger scale developments many homes are moved-into by people

<p>insufficient infrastructure capacity, increased flood risk, loss of green space and lack of affordable housing close to the town centre and facilities.</p> <ul style="list-style-type: none"> • There was a commonly expressed concern that homes built will not be for or meet the needs of local Exmouth people; • There were objections raised that houses would not be affordable, and they would be expensive and often large and serve/result in in-migration; • Objection advised that local first time buyers are being priced out of the housing market due to unaffordable house prices, the increase in 2nd home owners using properties for Air BnB's • Flooding concerns came up in a number of comments on sites around Exmouth and it was highlighted that houses in comments that Littleham is prone to flooding; • There was concern and objection raised that extra development in and around the town will lead to greater levels of sewerage discharge; • It was suggested that South West Water need to address sewage matters before extra development is allowed or occurs (lack of capacity was cited as a reason for opposing Government housing targets); • Comments received expressed concern that development at Littleham would erode gap with Budleigh Salterton and enclose the historic village; • Many comments expressed concern that development to the north of Exmouth would erode the gap between Exmouth and Lympstone (and Woodbury) and impinge on the settlement and character of Lympstone; 	<p>living in the district or close by. Affordable home occupancy is typically targeted at people with a local need.</p> <ul style="list-style-type: none"> • Flooding assessment has informed site allocation choices. • Sewage capacity concerns may need to inform phasing matters in plan policy and will be relevant at planning permission stage. • Site allocation choices have been made taking into account the sensitivities of sites. • Whilst neighbourhood plans have a relevance, given the scale of development that needs to be accommodated in East Devon they cannot 'dictate' development and land allocation decisions. • It is understood that Dinan Way is scheduled for construction in the near future. • Through and associated with development there can be calls for better bus services, more homes will equal more potential passengers and as such development can be beneficial. More buses could also help with alleviating pressure on roads, though it is noted local congestion does occur. Improved cycle links will also be supported and will be important for some new allocations. • The plan seeks to support new employment land coming forward. • It is acknowledged that there are limitations on some aspects of infrastructure capacity in Exmouth (though this is a concern replicated across East Devon and probably most if not all of England). Development offers scope to accommodate and support new infrastructure. • The environmental assets at and around Exmouth are recognised and policies at various points in the plan afford protection and promote enhancement.
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| <ul style="list-style-type: none">• There were many concerns expressed in respect of the highway capacity at and around Exmouth and the ability to cope with additional vehicular traffic;• The A367 was specifically highlighted, in many representations, as a road that is already congested and that cannot cope with additional pressure from development;• There were concern that the levels of development around Exmouth will leave to vast amounts of tree felling and loss;• It was considered that many proposed development allocations sites would be contrary to the Exmouth and also the Lympstone Neighbourhood Plans and too much development, in general, is planned leading to inconsistent with neighbourhood plan/s.• Views were expressed that completion of Dinan Way should happen before further development occur.• There were concerns that bus services were inadequate with specific calls for a 15 minute bus service on the number 57 to Exeter, plus reinstatement of the number 58 service to Sowton.• In some site specific comments there were concerns raise about adequacy of bicycle links and there was a call for cycle facilities on Exeter Road, Dinan Way, Salterton Road, and Rolle Street to enable journeys around the town and to the Exe Estuary Trail;• Many representations advised of limited employment in Exmouth, as a reasons to oppose residential development, with it being pointed out that most people travel to Exeter to work, new houses were seen as exacerbating this situation.• Views were expressed, in respect of many sites, that they were on the periphery of the town and some distance from the town centre. For example in representation it was advised that | <ul style="list-style-type: none">• Heritage asset sensitivities have been taken into account in making allocation choices, through these do need to weighed against other considerations. |
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Lymp_08, 09, 10a, 14 and Exm_04 are all more than 1.5 miles from the town centre with no public transport.

- There was concern expressed that development will inevitably be poor quality and that it will not support community needs.
- The suitability of Exmouth Community College to expand to accommodate additional pupils is challenged with recent school development proposals seen as being of poor quality.
- Parking, congestion and vehicle fume concerns are sited as problems at and with the school.
- There was a call for better train services and railway upgrades and a new Park and Ride station to the north of Exmouth.
- Many site-specific comments (objections) to development, raised concerns about the ability of the existing social and community infrastructure of Exmouth to meet existing needs. Significant concerns were raised around the ability to accommodate needs generated by additional housing development. There was a view expressed that new facilities provision should precede new housing development.
- Raw sewage is pumped into the sea during the summer due to lack of capacity, this must be resolved before increasing the problem
- It was highlighted that Exmouth is set out in a limb, constrained by Estuary (noting its wildlife designations) and sea to the south and west, AONB and Pebbled Heath to the east, estuary setting and landscape sensitivity to the north and there are limited main transport links into the town. These factors were highlighted as significant constraints in accommodating development.

- A new village on the fields around the Church of St John’s in the Wilderness would impact the important coast, town centre and countryside the least, with good road links along Dinan Way.
- The National Trust highlight important assets that they own at Exmouth, both countryside and built heritage. They stress the heritage importance of A la Ronde and landscape relevance of Lower Halsdon Farm. The trust identify adverse heritage and landscape impacts arising from development and advise - development at the proposed ‘second choice’ allocations could be at odds with the contribution that the National Trust land and surrounding area makes to the unspoilt open qualities of the landscape in this location, which should be highly valued. Therefore, for the reasons set out above, the National Trust object to the allocations as ‘second choice’ sites, and requests that these are omitted from future consultation stages of the emerging East Devon District Council Local Plan.
- Lack of infrastructure capacity in general, in Exmouth, such as GPs, dentists, schools, shops, recreational facilities, roads, storm water management & sewage treatment was commented on in many submissions and concern that new population growth would worsen problems without delivering extra facilities.
- It was contested that the level of house building at Exmouth is too high and is not justified by up to date robust evidence.
- Comment was made that the Plan makes no reference to the Blue Flag status of Exmouth beach despite the fact that this is a major draw for tourists and holidaymakers. Attracting people to Exmouth is supposed to be at the heart of the LP.

- At para 6.16 the Jurassic Coast and the AONB should be referenced (highlighted that text applied to Lympstone and Beer is applicable to Exmouth).
- The Avenues Residents Association advise - The proposed Littleham / Maer Valley Park shows no signs of becoming a reality as the landowner claims that it would take "valuable agricultural land" - the same landowner is, however, willing to sell parcels of the same land for housing developments.
- It was contested that there is not proactive activity being undertaken in attracting employment into Exmouth – and integrated strategy should be produced to evidence how jobs should be provided alongside any new homes (publication of the plan should be delayed until this happens).
- A response advised - there is a clear need to establish more active travel & sustainable transport options within the town, in particular creation of new sections that will link together existing cycle paths & walkways and a need for better bus services.
- Object to Exmouth sites as they are a long way from the town centre and its facilities, encouraging car dependency.
- Object to Exmouth sites as they will impinge on the green wedge further reducing the gap to Lympstone.

There were, however, some comments that were of a more general nature about development at the town, matters that need further investigation or that favoured development at Exmouth. These comments included:

- National Highways note there is a substantial outflow of commuters from Exmouth to Exeter which impacts upon M5 Junction 30 – Local Plan transport evidence should consider this impact;

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| <ul style="list-style-type: none">• Devon County Council (DCC) state proposed development in the Exmouth area cannot be mitigated by Exmouth Community College, so a review of catchment areas will see the need for a larger school in the proposed new town;• DCC support development in Exmouth but note the difficulties of development being able to come forward near to the town centre, train station, and facilities located in the south west of the town;• DCC state development around the north and east fringes must provide good quality bus services to existing facilities, and are better locations than a new community as would be closer to existing facilities – development on some of the second choice and rejected sites could reduce the need for a new community;• A site promoter supported the designation of Exmouth as a principal centre and considered that it would be possible to make provision for growth of 10% without conflicting with major constraints and government policy.• Concern was expressed that not enough effort is going into promoting employment in the town and thus negating/reducing the need to commute to jobs in Exeter.• East Devon AONB team request that Strategic Policy 20 to be altered to include reference to the need for LVIA or landscape assessment to be provided for appropriate sites to assess the effect the proposals would have on the AONB. They support the preferred allocations only;• A major landowner supports the proposal to locate a substantial amount of housing at Exmouth and the allocation of sites in its ownership (Clinton Devon Estates) as being deliverable, suitable for development and well related to Exmouth’s existing building up area; | |
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<ul style="list-style-type: none"> • There was a view that it is somewhat bizarre that Exmouth, the only Tier 1 town has such a very small allocation and that some small villages with almost no infrastructure and poor road links have more proposals. There was also a suggestion that Exmouth should grow further. • An Exmouth Member has expressed concern that the boundary changes were not considered by the Strategic Planning Committee and include some controversial sites, potentially this could be unfair/pre-emptive • Bystock Village should not be included within the settlement boundary. It has not been drawn consistently and conflicts with the methodology, whilst not adding anything to the land 'supply'. <p>Nb. Devon County Council's consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.</p>	
<p>Proposed allocated land on the north eastern side of Exmouth – Sites</p> <ul style="list-style-type: none"> • LP_Exmo_04a - Land at Marley Drive - <i>Potential 'Second Best' Allocation</i> • LP_Lymp_09 - Land at Hulham Road - <i>Preferred Allocation</i> • LP_Lymp_10a - Land off Hulham Road - <i>Preferred Allocation</i> • LP_Lymp_14 - Coles Field, Hulham Road - <i>Preferred Allocation</i> • These sites are grouped together as they form a proposed combined allocation in the draft local plan. Comments received on the sites have been grouped together to reflect on the 	<ul style="list-style-type: none"> • In officer responding comments it should be noted that Committee has resolved to not allocate sites Lymp_09 and Lymp_10a. The intent, now, is not to propose a single allocation for the two remain sites, Exmo_04a and Lym_14, rather they are recommended to have their own separate allocations. • Whilst noting the watercourse reference this is seen as a matter of detail that does not need policy coverage. • Comments on sites 09 and 10a are noted, but no action is now needed.

proposed collective provision as an allocation. However, specific points that may relate to a specific listed site or for example feature within or on it are highlighted. By way of comment on the site:

- Devon County Council (DCC) state an underground watercourse flows through Lymp_14 with sections possibly culverted – this should be investigated and opportunities to enhance or daylight any sections should be sought.
- DCC state the drainage at Lymp_09 and 10a may need to be carefully considered if infiltration is not viable – there do not appear to be any watercourses or sewers in the vicinity.
- Lympstone - Part of this site is in Lympstone Parish and designated 'red' on the maps as rejected for development. However, on the notes part of the site may be considered a second-best choice noting site constraints.
- As this was designated a rejected site it was not included in our Public Consultation but residents present at the Parish Council's presentation of their draft response to the East Devon Local Plan raised a number of concerns.
- A site promoter objected to an approach that seeks to link the delivery of these sites because they are in differing ownerships and some are affected by delivery constraints, whilst others are not. They considered Lymp_14 to be an unconstrained site that can be released early once services have been provided through the existing Goodmore's Farm development. There is no objection to masterplanning work being undertaken collaboratively, so long as that does not inhibit the opportunity to deliver Lymp_14 in expedient fashion.

- Site development is not now planned to be linked to master plan production.
- It is noted that there are trees and woodland and other biodiversity interests at and close to the allocated sites. Policy wording recognises their importance and established need for careful development.
- Ecological constraints, whilst noted, are not seen as factors that would stop pedestrian and cycle links being built.
- The sites are needed for development as a contribution to overall East Devon housing provision.
- We do not have objections from Devon County Council as highway authority to development.
- Sensitive development is planned and this will not result in overwhelming impacts.
- Infrastructure capacity matters will be addressed through other policies in the plan.
- Flooding concerns will be addressed through the application stage.
- As with other sites in Exmouth these sites are somewhat away from the town centre.
- The plan has affordable housing policies.
- It would be desirable to improve public transport services through development.
- Development, if well designed, will blend in with existing built fabric of the town as well as being well screened behind mature trees.

There were a very substantial number of objections to the principle for development of land on the north-eastern side of Exmouth. A summary of key matters raised in objections is set out below:

- Development would lead to adverse impacts on trees with Tree Preservation Orders and ancient woodland – it was advised that must be a 500 meter buffer between any development and ancient woodland.
- The woodland area included within the LP_Exmo_04a proposed allocation is under review and it is expected that it will be designated as ancient woodland later this year. This woodland must be retained as it is incredibly important from an ecological perspective supporting numerous fauna and flora. The woodland must be protected. If Exmo 04a is not withdrawn from the plan it will require a 50-metre buffer/exclusion zone around the woodland to aid its preservation.
- The land in the eastern section of proposed allocation Exmo_04a is to be proposed as additional county wildlife site as it immediately abuts the existing designated land in this area, which in turn abuts the ancient woodland.
- In the parcel EXM 12 there are TWO county wildlife sites and many extremely old evergreen oaks with TPO's
- Ecological constraints would mean that that pedestrian and cycle paths will not be built;
- Horrified and scared at the proposal to build yet more houses in the vicinity of Exe View and Hulham Road.
- Development would result in the loss of wonderful countryside, a respondent advises which I walk and relax is to be vandalised
- Concern over at least 200 more motor vehicles in Wotton Lane, known locally as the "rat run".

- It is noted some of the land is in Lymphstone parish, but in so far as the local plan is concerned sites are seen as an extension to Exmouth.

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| <ul style="list-style-type: none">• Lack of infrastructure – especially health service provision;• Development would lead to overwhelming by the extension of Exmouth;• Lack of clarity over who the houses are for;• Absence of businesses (nearby) to supply jobs for residents;• Development would adversely impact on appeal of the area to tourists.• Development of the site would not be sustainable;• There is inadequate school provision;• Roads are at capacity;• Highway safety and noise nuisance issues would arise;• Insufficient infrastructure capacity with expectation from development of particular pressure on the road links to Exeter.• Brownfield and town centre sites should be redeveloped to accommodate the extra housing;• Unacceptable impacts on wildlife within and at the site;• Flooding will be exacerbated by additional tarmac;• In respect if site Lym_10a one respondent advises it is - On the wrong side of the road. Floods a lot and blocks the stream down Wotton lane leading to flooding at the Sadllers Arms.• The sites are three miles from the town centre, which on top of the Goodmores estate will create more traffic on the local roads around that area which are already very busy;• Site/s are at the outer (or beyond) peripheries of acceptable walking distances;• Homes built will not be affordable. Highlighted that only 16 out of 317 homes on the Goodmore estate will be affordable. | |
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| <ul style="list-style-type: none">• Concern that there are not enough services in Exmouth to support another 1,000 local residents• Concern that Exmouth only has two large supermarkets in the town, the rest are small convenience stores with higher prices.• The view was expressed that this development, in conjunction with others, will have a huge negative impact on the health and wellbeing of Lympstone Parish residents.• Concern expressed that bus and rail services at or close to the site are very poor.• Access to employment opportunities was cited as being poor.• View is expressed that there are no safe pedestrian and cycle routes so residents will be car dependent;• The view was expressed that car use will be the norm for persons to travel to work on already overcrowded roads;• The development will have significant negative effects on the environment.• Farming land will be lost – one respondent advised it is Grade 1.• The green wedge between Lympstone and Exmouth will be seriously eroded;• The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents.• Valuable wildlife corridors will be lost;• Important areas of landscape and visual amenity will be lost forever;• Cherished green spaces and woodlands have been lost which could have created a sustainable barrier at the north of Exmouth to prevent it growing into an urban sprawl; | |
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| <ul style="list-style-type: none">• Loss of historic open land on Pebblebed Heath which is a valuable local amenity;• The area around is already over-developed;• The allocation is too remote from services and facilities in Exmouth;• Adversely impacting on the existing gateway entrance to Exmouth;• Part of the site falls in Lympstone Parish and housing need should be considered in the context of Lympstone needs;• Development had widespread local opposition;• The development will have a negative impact on the health and wellbeing of existing local residents;• The site is very wet in winter and holds a lot of surface water plus there are a number of springs - There would be a significant impact on sites below ie Goodmores and Brixington.• The northern part of the site can only be accessed through a narrow gap (5mtrs) between the ancient woodland and the historic hedge in the adjoining site (Lymp 14). Any road/access would do irreparable damage to the woodland/hedge.• This area is a wild life haven and development would have a serious detrimental impact on wildlife;• The Exmouth Neighbourhood Plan specifically stated that it should not be developed due to its historical significance and its ecological value;• Planning permission was previously rejected on this site (14/3022) and therefore highly inappropriate to bring forward this site into the current plan; | |
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- View expressed that the development would become a satellite settlement (of Exmouth);
- Local MP opposes the plans
- Air pollution will worsen, especially as trees will be lost
- Contrary to the Lympstone Neighbourhood plan where any developments are expected to be in the Built-Up Area Boundaries (BUAB) and their development risks the inexorable process of coalescence between Lympstone and Exmouth
- The development Exmo 04a is contrary to the Exmouth Neighbourhood Plan policy EN1 and the clear wish expressed on p.29 ' the community is clearly indicating these areas are the last that they wish to see development on'. This wish reflects to protect the presence of the protected Barbastelle Bat (S.P. 90) and a number of veteran trees (S.P. 74, 85)
- The proposal to create an employment site within the proposed mixed-use of the sites either side of Hulham Road is not practical. The sites to the north of Hulham Road are divided by the property Sowden Brake that is not part of the proposal and spanning the road is impossible.
- Exmouth Community Association advise - we object to all the suggested housing and employment allocations either side of Hulham Road, primarily because of remoteness from the town's services, not least the town centre. More development in this area should certainly be regarded as premature until such time as the planned Dinan Way link to the A376 has been implemented.

Views in favour of development (at least qualified in favour of development) included:

- A proposal submitted is to build an over 70's complex with 60 homes on a much-reduced Lymp 14 site. With traffic

<p>management measures as part of the scheme, including cycling and pedestrian improvements and also to provide a county park on land not being developed. This is considered to be a means to provide some housing without the scale of adverse impacts and also a means to secure community benefits.</p> <ul style="list-style-type: none"> • The promoter of site Exmo_04a considers that this site should be a preferred allocation. It is free from constraints, sustainably located and readily deliverable. Technical details are submitted with the representation. 	
<p>LP_Exmo_01 - Estuary side - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No comments 	<ul style="list-style-type: none"> • No comments
<p>LP_Exmo_02 - Queen's Drive, Exmouth - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Concern raised that this site would be developed into luxury flats. • Highlighted that Exmouth's only advantage is its seafront. The town itself is shabby. It was suggested landscape this area and enhance the natural setting for sport, outdoor seasonal entertainment and family recreation 	<ul style="list-style-type: none"> • Concerns over possible adverse seafront impacts are noted. However, development that is well done can lead to positive impacts.
<p>LP_Exmo_03 - Land at bottom of Bapton Lane - <i>Rejected Site</i></p> <p>A number of respondents to this site commented on negative impacts that could arise through inclusion in the Valley Park. Some suggested development of a single dwelling on the site would be desirable. Matters raised (including by the landowner who favoured development) included:</p> <ul style="list-style-type: none"> • One respondent suggests that the site is of biodiversity value though others contest this point and advise it is not of value – and it is observed that inclusion in the park would lead to adverse impacts on species present. 	<ul style="list-style-type: none"> • Adverse impacts on Valley Park delivery are noted. It is considered the site still retains potential value for Valley Park inclusion. • It is noted anti-social behaviour is possible on any open publicly accessible space, but this is not reason to seek to make provision. • Detailed biodiversity assessment has not been undertaken, though overgrown status of site parts may indicate possible higher value.

<ul style="list-style-type: none">• It was suggested the site is in some respects it is a brownfield site as it contains the foundations and part of the walls of greenhouses built in the 1970s together with a block constructed store.• Valley Park inclusion was done many decades ago when the whole of the land forming the remnants of Bapton Farm was so designated. When the Greenfingers site was removed from the Valley Park the logic for site inclusion was lost: the site is now isolated and given its small size, can provide little or nothing to enhance the Valley Park for locals enjoyment of it.• The land is long and narrow making it of very limited use for recreation. If it were to be opened to the public, it is likely only to be used for toileting dogs. Being small in area that is likely to lead to a build up of faecal material to the point where it becomes a hazard.• Public access to the site could worsen anti-social behaviour and adversely impact on peace and quiet.• Secluded and not overlooked- development would cause privacy and security concerns to adjoining residents.• There is lack of detail in respect how and when the land would be incorporated and what role the land would serve if incorporated <p>It was also highlighted that:</p> <ul style="list-style-type: none">• The southern pavement of Bapton Lane ends outside 14 Bapton Lane. Development of the site would allow the pavement to be extended toward the pedestrian bridge over the stream thus improving safety for pedestrian• The existing hedge to the site contains modest trees that nevertheless require trimming at public expense as they are	<ul style="list-style-type: none">• Any building remains at the site, bar limited existing structures, have become overgrown and 'returned to nature'.• Opportunities that the site may offer for greater public access and footpath provision are noted.
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<p>under power lines running to Bapton Farm. A new pavement section would require their removal.</p>	
<p>LP_Exmo_04b- Land at Marley Drive - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • The Environment Agency advise that a culverted watercourse runs though the site. There is an opportunity to reinstate an open channel with 8-metre buffer free from development. • It was highlighted the site falls in the Pebblebed Heaths 4000 metre exclusion zone and this is reason to oppose development. • Application of the 400 metre exclusion zone rule was opposed on the basis of adjacent properties already being in the exclusion zone and the site being separated from the Pebblbed Heaths by a busy road. • It was noted that around 1 hectare of the site is outside of the exclusion zone and it is suggested it is suitable for development (alongside Exmo_04a). • The site considered unsuitable for development in representation on account of: <ul style="list-style-type: none"> ○ distance from services, ○ inadequate infrastructure; ○ Being a wet area of land holding surface water ○ Wildlife value ○ impacts on roads ○ Leading to more commuting to Exeter – by future residents. 	<ul style="list-style-type: none"> • Concerns over watercourse are noted. • Proximity of the site to the Pebblebed Heaths is noted and forms a consideration in assessing suitability for allocations. The fact that some houses already exist in the buffer zone is not consider reason that new ones should be allowed, nor is the presenvce of a road. • Locational considerations and site characteristics, and comments on possible impacts on suitability for development are noted.
<p>LP_Exmo_06 - Douglas Gardens - <i>Preferred Allocation</i></p> <ul style="list-style-type: none"> • The Environment Agency state that areas at risk of flooding fringing the eastern boundary should be set aside for green 	<ul style="list-style-type: none"> • Flooding concerns that are raised and the buffer zone comment are noted. • Noted there is an application at the site. Land owner support ius noted.

infrastructure with at least an 8-metre buffer from the watercourse free from development.

- Devon County Council note this site has already come forward through a planning application.
- The landowner supports this allocation which is subject to a current application which has received supportive feedback from Members and is technically achievable.
- Exmouth Community Association object to this site and advise - If it is to be considered for inclusion, the owners should be asked to commit to the creation/safeguarding of a future Maer Valley Park at least providing increased public footpath access between Littleham and the seafront.

Matters of objection to site development included:

- Reduce viability of farming in the Maer Valley;
- Further overload Douglas Avenue with extra traffic;
- Result in loss of open space;
- Cause adverse impacts on the Littleham Brook;
- Lead to adverse landscape impacts;
- Adverse amenity impacts and proximity to a public footpath;
- Loss of an existing house to gain access
- Lack of sewage capacity;
- Contrary to Neighbourhood plan policies;
- Things have not changed since a previous planning application was rejected;
- Existing over development in the surrounding area;
- Site is near to the AONB;
- Lack of on-site parking within site development, exacerbating existing parking concerns on existing roads;

- Aspirations for a valley park are noted. A footpath runs through the site and this would provide scope to access any possible future park.
- Detailed concerns in respect of this site, that were raised, are noted. None of these, however, are deemed of sufficient note to not warrant an allocation for development.

<ul style="list-style-type: none"> • Visibility concerns at site access road junction; • Adverse biodiversity impacts; • This area should be a major new twelve months of the year Holiday Attraction as an Educational and Event location based on 'Regenerative Farming/Rewilding Project' along the lines of the highly profitable Knepp Estate in Sussex. • Harmful to character and appearance of the area. 	
<p>LP_Exmo_07 - Bystock Court - Rejected Site</p> <ul style="list-style-type: none"> • Exmo 07 and 21 are subject to the Exmouth Neighbourhood Plan action EBA1 (p.54) for investigation to create a future conservation area. Both Exmo 08 and 16 are either adjacent to or within the area proposed for designation as a future Littleham/Maer Valley Park (p.34) 	<ul style="list-style-type: none"> • Concerns in respect of site allocation are noted. It is recognised that the site contains features of heritage importance.
<p>LP_Exmo_08 & 16 - Littleham Fields and land to the rear of Elm Lane - Preferred Allocation</p> <ul style="list-style-type: none"> • The Environment Agency state that areas at risk of flooding fringing the south-eastern boundary should be set aside for green infrastructure with at least an 8-metre buffer from the watercourse free from development. • Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning 	<ul style="list-style-type: none"> • Flooding considerations raised are noted and these may need to be taken in to account in consideration of any future planning application. • Full heritage assessment features in site assessment work noting proximity of a designated asset to the site boundary. • Proximity of site to existing development, as referenced, is noted. • Detailed concerns in respect of this site, that were raised, are noted. None of these, however, are deemed of sufficient note to not warrant an allocation for development. Though sensitivity in how development is undertaken will be important, specifically

<p>(Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to rising land and impact on LB setting</p> <ul style="list-style-type: none">• The landowner says the site is closely associated with the existing built up area and with other recent developments in the vicinity such as the Plumb Park scheme, free of major constraints and is readily deliverable. It is wholly sensible for the land to be allocated for development in support of the wider approach of optimising the level of growth around Exmouth. <p>Particular points raised in objection to the development of the site included:</p> <ul style="list-style-type: none">• Development of housing will result in a further scarred landscape;• Sloping site will mean very prominent properties with imported fill material;• Loss of natural daylight will result from elevated new properties;• Vibration impacts will occur during development;• The site is of biodiversity value and adverse impacts will arise;• Site access roads are insufficient to meet needs;• Adverse construction impacts on road quality, noise, dust – leading to negative health impacts;• Loss of existing home property values;• It will make the farm, that uses the land, uneconomic;• Questioning of social housing provision from development;• Impact on the local distinctiveness and identity of Littleham;• Increased flood risk from development;• Adverse impacts on amenity of nearby residents;• Infrastructure and services will not cope with extra pressure from development;• Adverse impact on watercourses given proximity to a stream;	<p>noting landscape, biodiversity and access concerns, amongst other matters.</p>
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<ul style="list-style-type: none"> • Access through north west corner of site would be inappropriate – potential for access from the south; • Impacts on AONB and Jurassic Coast; • Maer Valley should be kept as a green open space; • Adverse impacts on appeal to tourists; • Houses built will not be affordable; • Capacity has doubled- earlier application was for 22 • Security concerns how will adjoining cows be kept off the development • Will impact on visitors to Sandy Bay • Access from Elm Lane is narrow and the junction with Littleham road would be dangerous. And when there are church services, Littleham Road becomes in effect a single track road. It is already heavily trafficked, particularly in the peak holiday season from Sandy Bay/Devon Cliffs Holiday Resort. The proposals also prejudice/compromise the implementation of the Littleham/Maer Valley Valley Park (Policy EN3 in the adopted Exmouth Neighbourhood Plan). 	
<p>LP_Exmo_10 – east of Liverton Business Park - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Exmouth Town Council members feel that Land Directly to the East of Liverton Business Park is the most acceptable in terms of sustainability. Of the sites proposed for Exmouth. • The view was expressed that I cannot understand why this site has been rejected as it is close to facilities i.e. shops, tip, bus routes, on a main communication route where development would not interfere with anyone else. 	<ul style="list-style-type: none"> • Support for site allocation is noted as is point made about proximity to facilities, but not all facility types. • The fact that the site is relatively remote from existing residences is also noted. Though negatives associated with this and comparative site isolation and bridging to Budeligh Salterton is also noted.

<ul style="list-style-type: none"> • Site supported for development in that it does not interfere with existing residences, as other sites do. • Particular points raised in objection to the development of the site included: • Tongue of urbanisation into farm land - this will render the farm in the valley uneconomic. • Site is isolated and would start to bridge a gap between Exmouth and Budleigh Salterton. 	
<p>LP_Exmo_17 - Land to the south of Littleham - <i>Potential 'Second Best' Allocation</i></p> <ul style="list-style-type: none"> • By way of introduction it is advised that this proposed allocation generated a very high level of comments (objections) with concerns around the appropriateness of development in the AONB being one key consideration that was highlighted by many respondents. • Comments from key agencies and the site promoter included: • The Environment Agency state that areas at risk of flooding associated with the Littleham Brook and other watercourses should be set aside for green infrastructure with at least an 8-metre buffer from the watercourse free from development. There could be natural flood management opportunities on this site to increase floodplain storage and reduce flood risk to the downstream community. • Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning 	<ul style="list-style-type: none"> • Concerns highlighted in feedback are noted. • The fact that the site falls in the AONB is noted, though landscape assessment has been undertaken for the site and its allocation is set within the context of strategic need to accommodate houses at Exmouth. • Flooding concerns are noted, though it is a big site so there is scope to address matters raised. • Heritage assessment is contained in the site assessment work. Proximity of heritage assets to the southern site boundary are noted though site size is such that buffer undeveloped areas can be provided and/or careful design undertaken to avoid adverse impacts. • Support and issues highlighted by and from the landowner are noted. • SWW concerns will need to inform at the planning application stage. • Detailed concerns in respect of this site, that were raised, are noted. None of these, however, are deemed of sufficient note to warrant an allocation for development. Though sensitivity in

(Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to the setting of the Grade 2* Church.

- Devon County Council state multiple ordinary watercourses run through this site North to South which should be considered as part of any proposal.
- The landowner says as well as providing a sizeable amount of housing, development of this land would be well sited close to the existing employment areas. It also offers the potential to provide road and none car connections between both the village of Littleham and Sandy Bay Holiday Park and thereby has the potential to help address traffic issues in the area. The allocation of the northern part of the land for employment use is sensible in that it would relate well to the existing Liverton Business Park and can help to provide balanced growth in the town.
- SWW service reservoir lies below the site. This is much larger than the visible equipment/compound would suggest

Particular points raised in objection to the development of the site included:

- Approach to site assessments in AONBs is inconsistent- numerous other sites in the District have been discounted due to the impact that much smaller numbers of houses would have on the AONB
- Soil at the site is heavy red clay and hard to drain so will generate pooling and flooding concerns (noting climate change considerations);
- Water runoff will increase from development – leading to flooding;
- It was considered that tide locking of the outfall of Littleham Brook into the sea will also occur more frequently due to sea level rise.

how development is undertaken will be important, specifically noting landscape, biodiversity and access concerns, including the cycle path bisecting the site. Heritage considerations are also noted as important and it is noted that concerns around graveyard capacity and tranquillity, amongst other matters, are of relevance.

- The potential for a link road through the site, expressed in comments, are noted. This however has not featured in assessment and justification for allocation work. Though may be explored at application stage.

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| <ul style="list-style-type: none">• Existing road network can't cope, especially noting impacts and pressures arising from Devon Cliffs Caravan site.• Surrounding area is a localised area for/of crime - buyers will be let down by the statutory agencies' lack of engagement with the social problems and crime;• Site is of importance as an area of rurality – relevance to both locals and tourists;• Adverse urbanising landscape impacts will arise;• Properties on Capel Lane could be materially affected and subsidence caused.• The site borders the grade 2* village church, which is a significant heritage asset and development of the site could have a significant detrimental effect on both the church and the surrounding graveyard and its biodiversity. There are also other grade 2 listed buildings near by as well as HERs at/on the site.• Many of the graves and certainly the Church, its Tower and retaining wall are historically important and runoff will absolutely affect their foundations;• The churchyard is reported as being the biggest in Devon and a beautiful, quiet oases of tranquillity;• There is a 'natural burial' area lying next to the site. Concern raised that the private area for quiet contemplation would be overlooked by poorly placed housing.• The graveyard is reported as nearly full and land for expansion is seen as needed;• A public right of way across the site and a cycle path will be adversely affected. The cycle path forms part of the National | |
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Cycle Network (Sustrans) NCN2 from Dover to St Austell and the international Tour de Manche between Plymouth and Poole.

- The site was reported as safe for families as children cycle on the current path away from cars, and is in a great location for some of the poorest households in Exmouth to access some greenspace. It was widely appreciated during lockdown. Walkers, runners and other cyclists also access the area as well.
- Housing provided will not meet a local need/not be affordable to locals;
- Site is in the AONB and should not be developed – any building raises broader issues around development in AONBs and the sites is considered important in a wider open landscape setting – including in respect of the coastline and Jurassic Coast; Constitutes major development in the AONB without justification as per NPPF;
- Development would extend the built form of development into the open countryside;
- Exmouth does not have the infrastructure to support site development;
- Site provides existing green infrastructure enjoyed by locals and visitors;
- The site is important for wildlife and adverse impacts would arise from development;
- Ancient irreplaceable hedgerows will be lost to development;
- Site development is not supported by the Neighbourhood Plan;
- Site is considered as similar to other sites that have been rejected as allocations in the local plan (comparative rejected sites are

<p>listed in representation) - it is considered inconsistency in approach exists;</p> <ul style="list-style-type: none">• Site is not well connected to the town of Exmouth;• Footpaths close to the site and along nearby roads are poor.• It is considered that many social and community facilities are not in easy walking distance of the site;• The site would make a wonderful Dark Night at Skies protected area due to having very little light pollution facing eastwards and the only light comes from the odd farmhouse.• Could lead to joining up of Exmouth with Budleigh Salterton;• Site is rich grassland and loss would impact on farming economy. It is regarded as being of agricultural importance, supporting the farming industry and food production and in representation it is reported as being Grade 1 agricultural land.• Development will lead to the loss of identity of the historic settlement of Littleham;• There is a large underground SWW service reservoir below the site.• Development is being driven by profit• It would be preferable to develop the fields off to the left as you approach on the path from the bridge on Capel lane• Castle Lane is a single track lane and is busy in summer.• Safe pedestrian crossing points cannot be provided on Salterton Road and there are no pavements along the site frontage• Facilities are more than 1600m from parts of the site• Adjoins a Grade 2* listed Church and forms part of its setting. Report says there are no other heritage assets in the vicinity but	
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there are numerous monuments and assets within and adjoining the site and these should be assessed.

- Littleham village should be a conservation area
- Site is bounded by a network of ancient hedgerows which stretch up to the pebblebed heaths. This biodiversity habitat/corridor will be lost as will the large field parcels which house specific species eg corvids
- Exmo 17 should not be included in the Plan (second choice site) apart from the small portion off Capel Lane.
- The Historic Environment Records show there are multiple HER Monuments at and around the site that should be taken into account in assessment.
- Paragraph 177 in the NPPF states when considering applications for development within National Parks, the Broads and AONB permissions should be refused for major development, other than in exceptional circumstances where it can be demonstrated that the development is in the best public interest.

Additional qualified views expressed included:

- Any building here should only occur to the north of the old railway line with easy access from the main road at McDonald's. No development should occur below the old railway line.
- The allocation of this site is another example of the difficulty of finding suitable sites for new homes in Exmouth. The site lies within the AONB but is "relatively" well positioned versus access to the town centre services/ public transport compared to the sites in the NE of the town.
- If EXMO17 is developed it should be only allocated for affordable housing for existing local residents. Far better to push for more brownfield sites within the existing BUAB (disused post office/

<p>police station/ EDDC’s Camperdown Terrace Depot etc) and avoid allocating this site.</p> <ul style="list-style-type: none"> Exmouth Community Association object to the allocation of this site but advise - if its inclusion is considered appropriate, the opportunity should be grasped to provide an extension of Dinan Way to give a more direct access for traffic generated by the Devon Cliffs resort at Sandy Bay, in turn removing this same traffic from the centre of Littleham village. 	
<p>LP_Exmo_20a - Land at St John’s - <i>Rejected Site</i></p> <ul style="list-style-type: none"> Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. DCC welcomes the rejection of this site as it is partly within the Mineral Safeguarding Area. The site promoter supports the allocation but does not consider it to be suitable for employment use. There was objection raised that: the top of the site is too close to the common (Pebblebed Heaths); there is an Unconfirmed County Wildlife Site at the site; traffic infrastructure is lacking and St Johns Road would need widening; There would be a loss of countryside; Increased traffic would result; 	<p>Site Exmo_20 (taken as a whole) is included as an allocation in the Publication Plan for around 700 new homes. Comments here for Exmo_20a should also be read alongside and taken to be relevant to Exmo_29b below as well. There are also response comments logged against the Exmo_20b site comment records. The two site parts are taken together to form Exmo_20 as allocated in the Publication plan.</p> <ul style="list-style-type: none"> Heritage matters feature in the site assessment work noting the particular importance of the St John in the Wilderness church. But as a large site there is extensive scope for buffers and sensitive planning to avoid negative impacts. The site part in the Mineral Safeguarding Area either would not be developed or assessment would need to consider whether constraints could be overcome. But this can follow at application stage. Allocation of the whole of Exmo_20 is considered appropriate for and should accommodate mixed use development including employment and social and community uses as well as open spaces.

<ul style="list-style-type: none"> • There is a lack of infrastructure. 	<ul style="list-style-type: none"> • Proximity to the Pebblebed Heaths is noted and appropriate buffers, for sensitive development types, will need to apply, • New infrastructure will need to come alongside development.
<p>LP_Exmo_20b - Land at St John’s - Potential ‘Second Best’ Allocation</p> <ul style="list-style-type: none"> • The Environment Agency state that this site appears to have had its boundaries altered to ensure they are more than 8m from two main rivers to the south and west of the site’s boundaries, which converge on the Southwest corner of the site. The site access does, however, cross the main river and the area of FZ3 associated with it to the west. A safe access and egress route will need to be carefully considered and a flood risk activity permit required. • Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. <p>There was objection raised that:</p> <ul style="list-style-type: none"> • 150 houses is a significant expansion towards Budleigh. Quite likely the applicant would seek more if permission given. • Development would weaken the case to refuse development on the Liverton Farm area currently shown Red. • Lack of infrastructure at the town; • Houses would be unaffordable to locals; • Loss of beautiful countryside. <p>In qualified support of the site:</p>	<ul style="list-style-type: none"> • Flooding concerns raised are noted and will have specific relevance at planning application stage. • Heritage issues are as summarised above. • Whilst outward expansion of Exmouth is noted, under site development, it is inevitable that Exmouth will extend outward is other than small scale infill in the town is to occur. There remains an appreciable separation between Budleigh Salterton and Exmouth. • Qualified support of the site is noted.

<ul style="list-style-type: none"> • A respondent noted the allocation of this site is another example of the difficulty of finding suitable sites for new homes in Exmouth. The site is “relatively” well positioned compared to site EXMO17 and the sites proposed in the NE of the town. • EXMO20b it was suggested should be only allocated for affordable housing for existing local residents. 	
<p>LP_Exmo_21 - Land north-east of Old Bystock Drive - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Exmo 07 and 21 are subject to the Exmouth Neighbourhood Plan action EBA1 (p.54) for investigation to create a future conservation area. Both Exmo 08 and 16 are either adjacent to or within the area proposed for designation as a future Littleham/Maer Valley Park (p.34) 	<ul style="list-style-type: none"> • Concerns about suitability of the sites for development is noted. • Heritage sensitivities at the site are specifically noted.
<p>LP_Exmo_23 - Land to the south of Courtlands Lane - <i>Potential ‘Second Best’ Allocation</i></p> <p>There was objection raised that:</p> <ul style="list-style-type: none"> • This site is in the green wedge, • The site is in the coastal preservation area, • It is accessed by a narrow lane and is used by walkers accessing the East Devon way or the Exe trail as well as cyclists, • It is in an unsustainable location, outside the BUAB. • This location is highly visible and would damage the landscape and skyline. • The site is in proximity to National Trust land; • The A376 can not cope with the current traffic and commuters; • Exist onto Exeter Road (A376) is dangerous • Development would join Lympstone and Exmouth; 	<ul style="list-style-type: none"> • Environmental sensitivities of the site are noted, including in the landscape. Though the site sits alongside existing built development that is also on a ridgeline. • Whilst accessed by a narrow lane this is acceptable from a highway perspective and slow enough moving for pedestrian use, also noting the allocation of land on the northern side of the lane and links that should be achieved for safe pedestrian access. • National Trust land ownership and proximity is not a reason to not allocate. • Whilst the site is on the edge of Exmouth and close to Lympstone village development would not result in settlement merger. • The site sits next to existing development and as such is not isolated.

<ul style="list-style-type: none">• Site is well away from Lypstone and Exmouth;• Other dwellings nearby are either isolated single dwellings or form part of the discrete groups of homes;• There would be habitat loss and wildlife impacts;• Development would encourage greater car use to access facilities <p>In qualified support of the site:</p> <ul style="list-style-type: none">• There was support for modest development (a respondents advised that as a modest sized site (if well developed) it compared favourably with the adverse impacts that large sites would have;• Site supported if road improvements to Courtlands Lane could be made;• It was advised that the site is not in the (existing) Green Wedge or AONB• Exmouth needs more well planned and designed homes on small and medium scale sites that offer more space and the opportunity to utilise public transport which is close by;• Site is close to amenities and a cycle track;• As a small infill site it appears OK with a lot less of an impact than most other proposals for Exmouth;• A prospective house purchaser in the are favoured development;• Historic hedgerows could be reinstated that were lost in the past;• On behalf of the landowner- the site is suitable for 6 or 12 houses (preferably 12). The site is identified as second choice sites, but ultimately it is required to deliver housing numbers and should therefore be a preferred site. An indicative layout and supporting technical information showing that the site is achievable accompanies the representation.	<ul style="list-style-type: none">• The support for the site as an allocation is noted.• It is recognised that some road improvements may be needed (though this is not fully clear) and could be made.• Recognition of the need for development at the town is noted.• Proximity to public transport is noted.• Landowner support for development is noted.
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<p>LP_Exmo_47 - Land west of Hulham Road (south-east of point in view) - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • A site promoter objects to the non-allocation of the site, which they consider to be well suited to residential development and incorrectly been included in the Register Park and Garden because there is no relationship between the site and the heritage assets. The owner is currently resolving this matter and the heritage concerns should not be considered overriding in the search for suitable land in a sustainable location. If allocated the site will assist the council in making appropriate provision for small sites. • A respondent advised that many people have said that development could take place as a single strip of housing alongside Hulham Road that would still leave a large space for the setting of A La Ronde. and Point in View. 	<ul style="list-style-type: none"> • It is noted that the site inclusion in the Registered Park and Garden is no longer applicable given that boundary changes have been made to the designation. Impact sensitivity considerations are still, however, a relevant matter. • Positive potential for development is noted.
<p>LP_Lymp_07 - Land at Courtland Cross - <i>Potential ‘Second Best’ Allocation</i></p> <p>There were a substantial number of objections raised to the proposed allocation of this land in the local plan.</p> <ul style="list-style-type: none"> • Historic England - Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. 	<ul style="list-style-type: none"> • Heritage matters feature in the site assessment work noting the particular importance of the Lympstone manor and listed wall. But as a large site there is extensive scope for buffers and sensitive planning to avoid negative impacts. The Publication plan allocation for built housing development is some way from the listed features. • Contrary to promoters’ observations some employment uses at the site are seen to be desirable to encourage mixed uses. • The site abuts Exmouth and as such is and should be assessed in respect to Exmouth growth, nit Lympstone (despite Parish boundary matters).

<ul style="list-style-type: none">• A site promoter supported the allocation, but does not consider it to be suitable for employment uses, although it could provide community recreational use. <p>There were objections raised that:</p> <ul style="list-style-type: none">• Lymp_07 should not be assessed under Exmouth as it is clearly within Lympstone and should be assessed as such. If assessed this way it would not be required, even as a 2nd choice site and therefore not allocated.• Development is a very serious threat to the identity of Lympstone with potential to “destroy the character and community of the village”.• The site has been the subject of 3 refuse planning applications including one at appeal (also a single house was refused at appeal)• This development will have a huge negative impact on the health and wellbeing of Lympstone Parish residents.• The site does not have easy access to bus and rail services (existing train services are running at capacity);• The site is remote from employment opportunities• Car use will be the norm for persons to travel to work on already overcrowded roads.• There is a lack of infrastructure capacity to cope with development;• The development will have significant negative effects on the environment.• Farming land will be lost;• The Coastal Preservation Area will be built upon and permanently lost – this directly contradicts Council policy.	<ul style="list-style-type: none">• The site if/when developed will reduce the gap between Exmouth and Lympstone village but the site is not visible from the latter, it falls on elevated ground and there will remain a separation of some size of the settlements.• Past planning appeals do not mean that an allocation at some stage should not be appropriate.• Whilst some Lympstone residents may perceive or see adverse impacts having a home to live in, which the site will provide, gives societal and residents benefits.• Concerns around public transport accessibility are noted but run counter to understanding of bus services frequency running close to the site.• It is noted that the East Devon Way runs through the site but this will be retained during and after development.• Whilst proximity to National Trust heritage assets have some relevance they are not immediate neighbours and can be considered through the application stage of work.• Plan policy allocates land for sports pitch use.• Support for the allocation is noted.
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| <ul style="list-style-type: none">• The green wedge between Lympstone and Exmouth will be seriously eroded;• There will be acceleration of the coalescence of Lympstone and Exmouth, destroying the sense of place and identity for residents.• Development would undermine any separation between Woodbury and Lympstone as settlements and undermines their historic character and identity;• The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents;• It would constitute piecemeal development not properly integrated with local communities and infrastructure;• Valuable wildlife corridors will be lost and there would be adverse biodiversity impacts -fields are bounded by ancient hedgerows and mature trees;• Biodiversity net gain would not result from development of the site;• There is potential for adverse impacts on the wildlife at the Exe Estuary (Cirl Bunting were noted as using the site);• Important areas of landscape and visual amenity will be lost forever.• The site is not near cycle links (also highlighted that the Exe Estuary cycle trail is already over-run with cyclists and pedestrians);• Development is contrary to the Lympstone neighbourhood plan;• Existing schools are already over-subscribed;• Lympstone village, in particular, lacks infrastructure – including limited facilities and parking and narrow roads;• Adverse landscape impacts would arise; | |
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- Lympstone has inadequate drainage and sewage provision, and extra development would place extra pressure on systems with flooding and increased sewage releases;
- The A376 is already congested and development would add to this;
- No information exists to show the costed resources needed to sustain such a housing development;
- Concern that any houses built, given underlying land values, would not be affordable for local/key workers;
- Adverse impacts would occur on adjacent heritage assets;
- Local community opposition to development should carry weight in the rejection of the site as a development option
- Part of the East Devon Way runs through this site. This route is described as "the perfect way to discover the hidden gems of the East Devon Area of Outstanding Natural Beauty" (<https://www.eastdevonway.org.uk/>)
- Adverse landscape impacts would arise, the site is prominent on the skyline;
- Scepticism was expressed in respect of developer "promise" of new sports facilities;
- Light pollution would arise from development;
- Development would have adverse health impacts on nearby existing residents;
- The National Trust highlight importance assets that they own at Exmouth, both countryside and built heritage. They stress the heritage importance of A la Ronde and landscape relevance of Lower Halsdon Farm. The National Trust reiterate past objections

<p>that relate to the potential for development of Site Lymp_07, specifically noting landscape sensitivity concerns.</p> <p>In qualified support of the site:</p> <ul style="list-style-type: none"> • A respondent advised it has access off the main road which is important; • It was suggested that some parts of the site maybe suitable for development (better than other options); • It is not good agricultural land. 	
<p>LP_Lymp_08 - Land off Summer Lane - <i>Potential 'Second Best' Allocation</i></p> <ul style="list-style-type: none"> • Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. <p>There were objections raised that:</p> <ul style="list-style-type: none"> • Development directly contradicts the findings of the government inspector who refused the building of a single house in this area. • Development would be a very serious threat to the identity of Lympstone. • This development, in conjunction with others, will have a huge negative impact on the health and wellbeing of Lympstone Parish residents. • There is not easy access to bus and rail services; • Access to employment opportunities is poor. 	<ul style="list-style-type: none"> • Heritage concerns noted by Historic England are noted but the site is not allocated in the Publication plan • Development would not be close to Lympstone village so it is very difficult to see how Lympstone identity would be threatened, or (specifically for this site alone) residents wellbeing. • Concerns over access to services and facilities are noted, though this is a common theme for many edge of settlement sites. • The site would not allowed to come forward in a way that would threaten Dinan Way provision.

- Car use will be the norm for persons to travel to work on already overcrowded roads.
- The current infrastructure struggles to cope.
- The development will have significant negative effects on the environment.
- Farming land will be lost.
- The green wedge between Lymptone and Exmouth will be seriously eroded;
- Development will accelerate the coalescence of settlements, destroying the sense of place and identity for residents.
- The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents.
- Valuable wildlife corridors will be lost.
- Important areas of landscape and visual amenity will be lost forever;
- Site lies on the alignment of Dinan Way extension and land should be safeguarded for the road;
- Potential for adverse impacts on the setting of the listed Al La Ronde;
- There is a lack of demand for housing in Lymptone village – it is suggested the Government advise that houses should not be built where there is not a demand
- The site is in the Green Wedge;
- No development should be allowed on this side of Hulham Road as once it starts it could continual and have a major impact to the landscape and wildlife.
- This development will be seen from Lymptone visually and be a blot on the landscape.

<p>LP_Lymp_10b - Land off Hulham Road - <i>Rejected Site</i></p> <p>This site, noting 10b forms a northern part of a larger HELAA submission, lies to the north of land that was shown as a proposed allocation in the draft local plan.</p> <ul style="list-style-type: none"> • Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. <p>There was support for not allocating this site with a suggestion it could be made part of a country park, and there were objections raised to potential development that:</p> <ul style="list-style-type: none"> • Allocation would extend development into the countryside; • Hulham road can't take the traffic without widening; • Woodbury road turn off is already blocked; • It would result in more traffic going through Woodbury; • In Exmouth sewage catchment that cannot cope. A new WWTW is needed to the North West. • The site is next to Yonder Wood (Site being developed by the Woodland Trust) so would be strange to build houses next to it. • There is poor pedestrian access to the site; <p>The site is considered undeliverable (noted by the HELAA panel); Site is remote from the centre of Exmouth;</p> <ul style="list-style-type: none"> • Facilities are on the edge of acceptable walking distances; • Any properties built would be unaffordable; • Any residents would be liable to commute to Exeter; 	<ul style="list-style-type: none"> • As the site is not allocated for development in the Publication plan Historic England observations are noted but do not need to be addressed. • Should a land owner wish to promote the site for country park use they could choose to do so. • Adverse impacts noted by some respondents are noted (though they are far unique concerns raised in respect to potential site allocations).
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<ul style="list-style-type: none"> • The site has clear views of the Estuary – so would have negative landscape impacts; • The site is of biodiversity value - forming part of wildlife corridor between the Pebblebed Heaths and the Exe Estuary; • Property is near listed building (Exe View House) and any development would be detrimental to this property; • The site should form part of the extended Green Wedge of Lypstone to both prevent Coalescence with Exmouth; • Brixington’s existing infrastructure is struggling; • Exmouth lack secondary school places; 	
<p>LP_Lymp_12 - Land north of Summer Lane - <i>Rejected Site</i> This substantial site on the northern side of Exmouth is not proposed as an allocation in the draft local plan. There was support for not allocating this site and objections raised to potential development that:</p> <ul style="list-style-type: none"> • Development would have adverse landscape impacts; • Adverse impacts on the heritage assets of A La Ronde; • The site is/forms in a Green Wedge between Lypstone and Exmouth; • Vehicle access is onto a narrow lane and to a main busy road; • Development will create flooding problems; 	<ul style="list-style-type: none"> • This site is not included for allocation in the Publication plan and concerns raised are noted. • Potential for adverse heritage and landscape considerations in respect of this site are noted.
<p>LP_Lymp_13 - Kings Garden & Leisure, Higher Hulham Road - <i>Rejected Site</i> The Kings Garden centre lies on the northern edge of Exmouth and is not allocated for development in the local plan (the site is occupied by an operational business). The site adjoins land that is allocated for development in the plan on the north eastern edge of Exmouth. There</p>	<ul style="list-style-type: none"> • The existing use of the site is noted and the adverse economic impacts recognised should development occur and employment losses occur.

<p>was support for nit allocating the site and objections raised in respect of potential for development included:</p> <ul style="list-style-type: none"> • Over development of the area; • This is a very valuable thriving business that is used and provides a beneficial service/facility; • Development will cause massive floodings in Lympstone and on the main road; • Development will cause loss of habitat of the wildlife that live in harmony with the garden centre; • Lack of infrastructure, • Lack of employment; • Very poor road links to Exeter where most will look for work. 	
<p>Omission sites at Exmouth</p> <ul style="list-style-type: none"> • The landowner supports Land to the East of Liverton Business Park (Exmo 18) being proposed for three hectares of employment use. This allocation will help the Estate to continue to deliver new jobs through its existing development of the Estate’s adjacent Business Park. Notwithstanding our concerns, set out above, about the lack of settled evidence on the overall form of employment need, the location of Exmo 18 alongside existing and successful employment uses and its site adjacent to the most important town in the District strongly suggests that development of this land for employment can make an important contribution to the District’s economy. • To deliver what is required, greater consideration should be given to allocating more sustainable sites within the existing BUAB sites with a major focus on providing affordable housing for local 	<ul style="list-style-type: none"> • Allocation is made for Exmo_18 in the Publication plan. Matters raised by the promoter are noted as is the need for employment provision at Exmouth. • Redevelopment opportunities in Exmouth have been explored and where reasonable sites have been allocated – these include the police station site- Exmo_50. • The suitability of Marley Hayes, Lymp_17, as an allocation has been considered but it performed poorly on biodiversity grounds.

<p>residents e.g. re-development of the head of Camperdown Creek site (Exmouth Neighbourhood Plan p.67), the disused police station and post office and the southern section of site Exmo 20 adjacent to the Liverton Business Park and the solar farm.</p> <p>The owner supports land at Marley Hayes, Hulham Road, Exmouth EX8 5DZ (what3words ///rooms.clock.figure) as being suitable for up to 80 houses. This comprises a field of approximately 4.5 acres, fringed by woodland, the driveway leading to it and a small area of approximately 0.3 acres at the entrance to the driveway adjoining Hulham Road</p>	
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <p>Lymp_17 – Land SW of Marley Hayes, Hulham Road, Exmouth – Rejected site</p> <ul style="list-style-type: none"> The responses to the question about site Lymp_17 not being allocated express broad support for this decision, with many commenters highlighting the site's environmental and access-related constraints. Respondents emphasize the importance of preserving the site's wildlife habitats and mature vegetation, as well as concerns about the limited road infrastructure and its inability to accommodate additional traffic. There is also a clear sentiment that the site is more appropriately located within the Lympstone parish rather than being considered part of Exmouth's allocation. <p>Key points raised, in order of frequency:</p> <ul style="list-style-type: none"> Environmental and Ecological Concerns 	<p>Officer commentary in response:</p> <p>Lymp_17</p> <ul style="list-style-type: none"> Opposition to development is noted. Biodiversity sensitivity at this site is a very important consideration. Heritage concerns are noted. <p>Exmo_50</p> <ul style="list-style-type: none"> Support for redevelopment is noted. Heritage matters at the site are recognised to be of importance. Positive locational and proximity considerations associated with the site are noted. Reuse of already developed land is also recognised.

- Importance of protecting the site's wildlife habitats, including mature trees and unimproved grassland
- Role of the site in providing valuable ecosystem services and supporting biodiversity
- Infrastructure and Access Issues
- Concerns about the limited road capacity and lack of sustainable transport options
- Doubts about the feasibility of accessing the site from the constrained Hulham Road
- Location and Boundary Delineation
- Disagreement with the site being considered part of Exmouth's allocation, as it is located within the Lympstone parish
- Importance of maintaining clear boundaries between settlements

Overdevelopment Concerns

- View that the Exmouth area has already experienced excessive housing development
- Calls for concentrating new development within existing towns and urban areas
- General Support for the Non-Allocation Decision
- Approval of the decision not to allocate the site for development
- Potential Impacts on Quality of Life
- Worries about the site's development exacerbating existing infrastructure and service issues in Exmouth

Statutory organisations summary

Historic England

- Note this large site contains one listed building along with numerous records relating to non-designated heritage. Request it is included

in the HESA and advice of County Archaeologist is sought on non-designated heritage assets, with the site allocation policy supported by masterplanning and key design principles.

- Devon County Council
- Agree there no guarantee of achieving access through the narrow private road no to Marley Road and this would not be suitable.
- Concerns around limited primary capacity in Lympstone and also require secondary school contributions.
- State the slightly sloping topography means there is potential for the creation of inert material during construction, which should be considered in the layout, design and levels of any development.

Exmo_50 – Disused police station – Preferred allocation

- The responses to the question about allocating site Exmo_50 (the disused police station in Exmouth) show strong support for redevelopment, with a focus on housing. Most respondents view this as a positive use of a brownfield site within the town centre. However, there are concerns about infrastructure, especially sewage systems, and the type of housing to be provided. Many emphasize the need for affordable or social housing, and stress the importance of sensitive design given the site's location near historic buildings.

Key points raised, in order of frequency:

- Support for brownfield development
- Preference for using brownfield sites over greenfield
- Seen as sustainable and efficient use of urban land
- Housing type and affordability

<ul style="list-style-type: none">• Strong emphasis on need for affordable or social housing• Some calls for housing suitable for younger generations• Design considerations• Need for sensitive development respecting nearby historic buildings• Current police station described as an "eyesore" by some• Infrastructure concerns• Sewage system capacity issues mentioned frequently• Road network and other infrastructure (schools, healthcare) also noted• Location benefits• Proximity to town centre and facilities viewed positively• Seen as more sustainable than rural development options• Alternative uses suggested• Some preference for retaining police presence or station• Suggestion for car park use• General support for redevelopment• Site viewed as currently underutilized or run-down• Redevelopment seen as part of town improvement• Concerns about overdevelopment• Some worry about impact on existing residents• Calls for infrastructure improvements before further development• Environmental considerations• Mentions of need for sustainable features (solar panels, grey water storage)• Preservation of countryside by developing in town• Scale and mix of development• Some comments on need for appropriate scale• Calls for varied housing types	
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Statutory organisations summary

- Historic England
- Note the site is located within Exmouth Conservation Area and there are numerous listed buildings around the site, so it should be included in the HESA and policy containing design criteria and recommendations for mitigation and enhancement.
- Environment Agency
- On-site surface water flood risk needs to be assessed, and redevelopment should manage surface water through SuDS to remove flows from the combined network and reduce risks to the environment.
- Devon County Council
- Good access and sustainable travel options.
- There is spare primary school capacity but contributions towards secondary provision will be required.
- The existing buildings on site means there is potential for the creation of inert material during construction, which should be considered in the layout, design and levels of any development.
- NHS Integrated Care Board
- There is a lack of primary care infrastructure capacity at Exmouth, so developer contributions are required to mitigate the impact of development.

Honiton and its future development

Draft Plan consultation

Key issues raised in consultation:

- The East Devon AONB team request that Policy 21 should be amended to refer to the need for LVIA or landscape assessment as part of any details being brought forward on specific sites. Attention is drawn to the outstanding landscape setting of both the Blackdown Hills AONB and East Devon AONB.
- National Highways anticipate that the strategic road network can accommodate the level of growth proposed but expect a high-level transport assessment as evidence for the Local Plan.
- Devon County Council (DCC) state Honiton Community College will require expansion to meet the needs of proposed development in the area.
- DCC support development at Honiton and suggest some of the second choice and rejected sites should be reconsidered given the close proximity of existing facilities.
- Turk's Head junction and the A30/A35 roundabout will need to be assessed in light of the proposed development.
- Honiton is the "capital" of East Devon and needs more development, especially social housing. More social housing close to schools and shops would be beneficial to the town's residents.

Officer commentary in response:

General Issues

- A significant number of the general issues raised concern the adequacy of existing infrastructure, such as transportation networks, educational institutions, healthcare facilities, recreational spaces, and sewage disposal systems, to accommodate new housing developments. These matters will be thoroughly examined in the forthcoming Infrastructure Delivery Plan, which will identify critical infrastructure needs and propose strategies to address them in conjunction with the Local Plan's development proposals.
- General concerns have been expressed regarding the potential impact of development on the National Landscapes within Honiton, which encompasses two designated areas and overlaps with Areas of Outstanding Natural Beauty. Landscape impact assessments will be conducted to evaluate the potential effects of development on these sensitive areas.
- The aspiration for increased provision of affordable housing has been noted, and Local Plan policies will incorporate requirements for affordable housing, subject to the financial viability of development schemes.

- Disappointed that the town's development is leaning towards the west, and that there is no mention of an eastern bypass.
- Millwater School site proposed for housing, contrary to previous understanding that it was for Littleton Academy expansion.
- Honiton needs to grow to survive. The town centre is geared toward the older resident population, which is unsustainable. A slightly larger population would encourage investment and improve employment and leisure facilities. Most of the Honiton's housing stock was built after 1970, so residents who oppose growth should be aware that their houses were once green fields.
- Honiton's new housing should reflect the town's historic architecture. Bus links need to be improved, especially with the railway, and bus services to places not served by public transport need to be protected by funding from developer contributions. Because of the hills, cycling is a bit trickier, but having regard to cyclists through the creation of safe cycle routes to the town and railway station would be good.
- Honiton needs more economic land to support its growing population and economy. The Heathpark Estate is almost fully occupied, and the Ottery Moor Industrial Estate was lost to housing. The proposed development of industrial land to the west of Honiton is essential to providing local jobs.
- Honiton needs improved transport infrastructure, including railways, public transport, and roads. The Dowell Street junction is particularly problematic due to high traffic levels and illegal air pollution. A western bypass linking the A373 to the A30 would be a good solution, but development in the

- There is widespread support for the need for Honiton to grow and develop to enhance the town centre and stimulate the local economy.

LP_GH/ED/39a - Land south of Northcote Hill - Preferred Allocation

LP_GH/ED/39b - Land south of Northcote Hill - Rejected Site

- Noted both DCC and EA raised there is a culverted watercourse, it should take into account when detail design.
- Noted the Honiton Town Council support the brownfield site for development
- Noted a high number of objections from the residents of Otter Valley Park, mainly regarding the new development would affect the value, safety, access, noise and utility supply to the existing residential park. The above concerns should be considered via a planning application.
- Noted some comments prefer the site location in the view compared with other AONB sites and the southwest side of Honiton.
- Noted the concern regarding the development would be located close to a railway line, which would pose a noise and safety hazard to residents

LP_Gitti_03 - Land south of the A30, west of Honiton - Proposed Employment Allocation

LP_Gitti_04 - Land and south of the A30, west of Honiton -Proposed Employment Allocation

- Noted National Highways' comments.
- Noted Gittisham Parish Council's objection to the employment sites, while the employment sites are currently allocated in the existing local

area must be prohibited until traffic infrastructure issues are resolved.

Nb. Devon County Council’s consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.

LP_GH/ED/39a - Land south of Northcote Hill - Preferred Allocation

- The Environment Agency advise that has an area of FZ3 to the northeast of the site. This area should be set aside as GI, with a buffer of at least 8m from the watercourse, free from built development.
- DCC understand there is a culverted watercourse that is potentially not accurately mapped on existing maps – opportunities to enhance the existing watercourse should be sought which may be include daylighting the culvert.
- The Site promoter supports the development of 100 homes in GH/ED/39a and 240 homes at GH/ED/39b, and proposed the development will include a local centre, public open space, and allotments/community garden.
- Honiton Town Council agreed this Brownfield site is a suitable location for development.
- A high number of representations from the residents of Otter Valley Park. They objected the GH/ED/39a site, and have following concerns regarding the proposed development:

plan. Honiton would need an employment site to support the economic growth and suggest the allocation of both sites.

LP_Gitti_05 - Land west of Hayne Lane, Honiton - Potential ‘Second Best’ Allocation

- Agreed Woodland Trust advise on the trees on sites.
- Noted both Honiton Town Council and Gittisham Parish Council object to the proposal site, due to being too large in NL.
- Agreed comments regarding the NL and landscape impact.
- Noted the concern regarding access road, DCC – highways suggested suitable access off Hayne Lane with a potential secondary/emergency access route through Baker estates.
- Agreed the site located far away from Honiton Town centre, and based on the committee meeting discussion. Gitti_03, Gitto_04 and Gitti_05, these lands on the western side of Honiton are allocated for a mixed-use development to provide 310 homes and a total of 14.6 hectares of employment and community uses land. This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented.

LP_Gitti_06 - Hayne Farm, Hayne Lane, Honiton - Preferred Allocation

- The site has an approved planning permission, and will not be processed on local plan allocation.

LP_Honi_01- Land at Heathfield, east of Hayne Lane, Honiton - Potential ‘Second Best’ Allocation

<ul style="list-style-type: none"> ○ The siting of the taller and more expensive 4-bedroom units could be closer to the boundaries of the park and disrupt the privacy and tranquillity of the residential park, also would have a visual impact for the existing houses. The park is home to many older residents, who are attracted to the privacy and tranquillity of the area. ○ The development could impact the existing utility supply to the park, as well as street lighting and emergency and firefighting equipment. ○ The current traffic in the area is already unacceptably high, due to the traffic from the A30/A35. The proposed development of additional housing would only make the traffic even worse. ○ The risk of fire in the existing timber-framed home due to the new large housing estate nearby. There are concerns regarding the chance of bonfires, barbecues, and fireworks in the area, which could pose a fire hazard to the existing home. ○ Noise and the other impacts from the construction (including the new road/ existing road widening) would directly affect existing residents' life and all the residents' age above 50. ○ The proposed development of new housing would devalue the existing park homes in the area. Existing residents are concerned that they will not be able to sell their homes if the development goes ahead. ○ The development would require the construction of a new 2-lane road, cycle track, and pedestrian path, which would disrupt the residents of Otter Valley park. 	<ul style="list-style-type: none"> ● This site was replaced by a larger site, Honi_15. All the representation made in Honi_01 would be put forward and considered. ● General objection regarding the AONB, landscape impact, and wildlife impact noted ● A high number of representations, including Gittisham Parish Council object Honi_01, major concern focus on the access road issue. Devon CC – Highways comment: Accessible from A375 Sidmth Rd & Hayne Lane. ● Support from the developer noted <p>LP_Honi_04 - Land lying to the north-east of Heathfield Manor Farm, Honiton - Rejected Site</p> <ul style="list-style-type: none"> ● noted <p>LP_Honi_05 - Land to the north and south of King Street (including former Foundry Yard), Honiton - Potential 'Second Best' Allocation</p> <ul style="list-style-type: none"> ● The site is surrounded by flood zones 2 & 3, noted EA advice the site would need to be subject to SFRA2. The site would not suggest an allocation, and it may come through a planning application instead of a local plan allocation. ● Noted concern regarding heritage impact raised by Historic England. ● General support by Honiton Town Council noted <p>LP_Honi_07 - Land adjacent to St Michael's Church, Honiton - Potential 'Second Best' Allocation</p> <ul style="list-style-type: none"> ● Noted the concerns regarding heritage impact, landscape impact and NL from residents, Historic England and Honiton Town Council ● Noted the Devon CC comment on the surface water sewer.
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- Multi-generational housing estate is not suitable for the needs of the area. The land should be used to expand the retirement village instead, as this would be more in line with the needs of the current residents and would have a smaller impact on the environment.
- The local facility such as GP surgery are already over capacity and there is no provision to resolve this.
- Development at the northeast edge of Honiton, which is closer to town centre and facilities compare with those sites in southwest Honiton.
- The development would be located close to a railway line, which would pose a noise and safety hazard to residents.
- The proposed site would be a better option for housing than the designated AONB sites. It is a lovely place to live, within walking distance to the town, and the best place to put houses in Honiton.

LP_GH/ED/39b - Land south of Northcote Hill - *Rejected Site*

- Site promoter supports the development of 100 homes in GH/ED/39a and 240 homes at GH/ED/39b, and proposed the development will include a local centre, public open space, and allotments/community garden.
- Honiton Town Council stated that this site is suitable for development in line with GH/ED/39a. They believed that the land allocated for solar energy at Hale Farm is suitable for development.
- The development would be located close to a railway line, which would pose a noise and safety hazard to residents.
- The local facility such as GP surgery are already over capacity and there is no provision to resolve this.

- Support from Site promoter noted

LP_Honi_09 - Former Honiton Showground, Langford Road, Honiton - *Rejected Site*

- Support from the agent noted while the site location is isolated from the rest of the Honiton Built-up area.

LP_Honi_10 - Land at Ottery Moor Lane - *Preferred Allocation*

- National Highways and Honiton Town Council comment regarding the A30 impact on the site noted. Planning application stage would cover the detailed design.

LP_Honi_12 - Land on the south-east side of Cuckoo Down - Lane and land at Lower Marl pits Farm, Honiton - *Rejected Site*

- noted.

LP_Honi_13 - Middle Hill, Church Hill, Honiton - *Potential 'Second Best' Allocation*

- Noted the concerns regarding heritage impact, landscape impact and NL from residents, Historic England and Honiton Town Council
- Noted the concern regarding the traffic congestion
- Noted the Devon CC comment on the surface water sewer.

LP_Honi_14 - Hurlakes, Northcote Hill, Honiton - *Potential 'Second Best' Allocation*

- Suggestions for pedestrian and cycle access are noted.
- Support from Honiton TC noted.

- Development at the northeast edge of Honiton, which is closer to town centre and facilities compared with those sites in southwest Honiton.

**LP_Gitti_03 - Land south of the A30, west of Honiton -
*Proposed Employment Allocation***

- National Highways note this site is adjacent to the A30, and presume these sites will be accessed by the Local Highway Network.
- Gittisham Parish Council objects to the 15ha employment allocation west of Hayne Lane. The council believes that the development would be too large, detrimental to the landscape, and would require significant investment in infrastructure. The council also believes that the development would increase flooding in the area.

**LP_Gitti_04 - Land and south of the A30, west of Honiton -
*Proposed Employment Allocation***

- National Highways note this site is adjacent to the A30, and presume these sites will be accessed by the Local Highway Network.
- Gittisham Parish Council objects to the 15ha employment allocation west of Hayne Lane. The council believes that the development would be too large, detrimental to the landscape, and would require significant investment in infrastructure. The council also believes that the development would increase flooding in the area.
- Developer (Combe Estate) support the site allocation.

**LP_Gitti_05 - Land west of Hayne Lane, Honiton - *Potential
'Second Best' Allocation***

- DCC note there are several ordinary watercourses within this site which have required significant works downstream to manage associated erosion.
- Woodland Trust advise that trees on the Ancient Woodland/Ancient Trees inventory (ref Veteran Pedunculate Oak (ATI no: 114363)) are within the site. Please ensure that necessary protections are in place for these trees and ancient woodland sites, including suitable Root Protection Zones and buffer zones of at least 50metres between any development and the ancient woodland. Please ensure that no development will take place which will adversely impact irreplaceable habitats according to the NPPF.
- Honiton Town Council stated the allocated site is too big and encroaches into the AONB. They would support a smaller site, restricted to the east and out of the AONB.
- Gittisham Parish Council objects to the proposed allocation LP_Gitti_05, which would see 31 new homes built on land near Gittisham village. The council has a number of concerns about the development, including its impact on the setting of the village and the AONB, its impact on traffic and infrastructure, and the lack of provision of community facilities.
- Developer (Combe Estate) support the site allocation and introduce 3 development proposals for the site
- The developments would add an additional 200 homes to the area, which would put a further strain on the roads and other amenities.
- The development would have a detrimental visual impact to the AONB and on the setting of the AONB.

- The development would destroy wildlife habitats and damage the natural beauty of the area.
- The development would have a detrimental impact on the setting of Gittisham Village and its conservation area.
- The development would be located in an industrial area, which is not appropriate for residential development.
- Distance from town centre, schools, health centre/hospital, train station and commercial centre will result in car travel resulting in an unsustainable development.
- It is not appropriate to increase further residentially generated traffic and pedestrian movements through an industrial estate.
- Highways, sewers, and sewage treatment infrastructure already at capacity
- The proposed development would further increase flooding in the area. The author believes that the development would make the problem worse because the river catchment in the area is already very reactive to flooding.
- The actual area proposed for development must be clarified before any proposals are made.
- The current emergency access to the Hayne Farm estate is very poor, and it would only get worse if the proposed development went ahead.
- Meadow Acre Road, which is currently the main access route to the area, is already too narrow and crowded with vehicles. And the access routes from Hayne Lane and the Industrial Estate are not ideal.
- Those recently built housing has had a detrimental environmental impact and impact upon the beneficial qualities such as “Dark Skies”.

- No “exceptional circumstances” that would justify allowing this development. More suitable sites available for development in Honiton such as brownfield sites.
- The allocation of any part of Gitti_05 site would be contrary to Objectives 7-9 and 11 of the local plan.
- New developments are far from High Street, so active travel links are needed to prevent people driving to Tesco and harming High Street businesses.
- Social housing is needed in Gittisham.

LP_Gitti_06 - Hayne Farm, Hayne Lane, Honiton - Preferred Allocation

- Developer (Baker Estates) support this allocation as a logical continuation of the estate under construction to the north.
- Developer (Baker Estates) state allocation should be mended to about 36 dwellings rather than 31, reflecting the outline planning application (22/1322/MOUT) (now approved subject to s.106).
- Honiton Town Council supports the allocation.
- The developments would add an additional 200 homes to the area, which would put a further strain on the roads and other amenities.
- The area is designated as an AONB, which means that it is a special area of outstanding natural beauty.
- The development would destroy wildlife habitats and damage the natural beauty of the area.
- New developments are far from High Street, so active travel links are needed to prevent people driving to Tesco and harming High Street businesses.

**LP_Honi_01- Land at Heathfield, east of Hayne Lane, Honiton
- *Potential 'Second Best' Allocation***

- Honiton Town Council objects to the proposed development of this site because it is within the AONB and would adversely affect the landscape and ecology. Two previous planning applications for the site have been refused, and the reasons for refusal are still valid.
- Most of the representations concerned the site is in an Area of Outstanding Natural Beauty and would have a negative impact on wildlife
- A high number of representations object Honi_01 allocation, including a petition signed by residents in the existing neighbourhoods. Most of the residents concerned the existing roads are not suitable for increased traffic, and Honeysuckle Drive would become a main access road causing increased traffic, loss of privacy to residents and increased noise levels. Also, it is not feasible for this small road to handle an additional 300+ cars; Old Elm Road is a small road that is already in poor condition. If it is used as an access route for the proposed development, it would create chaos for thousands of residents and the road would become unusable; Hayne Lane is a narrow, unpaved road that is in need of repair. It is already heavily used, and the proposed development would only make it worse.
- Gittisham Parish Council is also concerned about the access to LP_HONI_01. This proposed allocation is outside the parish but would be accessed through Gittisham Vale. The council believes that it is not appropriate to increase traffic and pedestrian movements in this area.

- Gleeson Land supports the allocation of the Honi_01 site as a housing allocation meeting local housing need in Honiton. They believe that a landscape-led development can be brought forward on the site, which would be well integrated into the landscape and would create a softer, more sympathetic edge to Honiton in this location, enhancing the Area of Outstanding Natural Beauty (AONB). They suggest that the Honi_01 site is deliverable within the first five years of the plan period.
- Gleeson Land believes that there are wider opportunities to bring forward additional housing growth in the Honiton area. They have provided a landscape capacity plan for the fields to the west of the Honi_01 Site, which they also control, and suggested that a comprehensive development on these sites would not harm the landscape and would enhance the AONB.
- No direct access to any roads, so new access roads would need to be built across fields in the AONB.
- The existing sewerage and drainage systems are already overloaded, it would increase flooding and sewage discharge issues in the area.
- The subject site was refused, the decision should remain as the reasons for refusal still apply today.
- There are general concern from the representations regarding the local facility such as GP surgery and local schools are already over capacity and there is no provision to resolve this. Honiton has already lost public toilets due to a shortage of funding
- The development would not be in keeping with the surrounding area, which is mostly bungalows.

- Water pressure is an issue in Heather Close and this site is higher and closer to the water reservoir, which will cause pressure issues unless additional pumping facilities are provided.
- Honi_01 is located next to a flood-prone brook. The development would increase the risk of flooding to existing properties by increasing surface water runoff and blocking the brook's natural drainage path.
- Honiton town centre does not have enough car parking space
- The proposed site is home to a variety of protected species of wildlife, including barbastelle bat and 7 RSPB priority species. The development of the site would have a significant impact on the ecology of the area, including the loss of foraging and breeding habitat for bats, the loss of nesting and feeding habitat for birds, and the disturbance of newts during their breeding season.

LP_Honi_02 - Land at Blackdown House, Honiton - *Rejected Site*

- No comments

LP_Honi_04 - Land lying to the north-east of Heathfield Manor Farm, Honiton - *Rejected Site*

- Agree with the status of 'rejected', the land lies within the AONB and would have a high visible impact on the area if developed

LP_Honi_05 - Land to the north and south of King Street (including former Foundry Yard), Honiton - *Potential 'Second Best' Allocation*

- The Environment Agency advise that the site is bisected by main river, but flood risk is not acknowledged in the policy. The site would need to be subject to SFRA2, and the

sequential and exception tests before being allocated. If the site can pass the sequential and exception tests it should be supported by a masterplan, informed by the SFRA2, to secure a reduction in flood risk and environmental enhancements.

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. It would be particularly interesting to appreciate why you consider this to be unacceptable for heritage reasons
- Honiton Town Council satisfied the proposal but subject to appropriate flood mitigation.
- Pedestrian walk through on this development from the High Street would be desirable so that Mill Street (which has limited footway) need not be the only link at this end of town.
- The site should be use for a new central car park to become a community space or market place

LP_Honi_06 - Former Millwater School, Bottom Road, Littleton, Honiton - Preferred Allocation

- Devon County Council, as landowner, supports allocation as a brownfield site within the urban area with good access to local facilities and transport options.
- Honiton Town Council supports allocation.
- The site could be used to expand Littleton School
- Brownfield site development is a good way to reduce urban sprawl and create new housing in areas where needed. The

development of this site would be a positive addition to the area.

LP_Honi_07 - Land adjacent to St Michael’s Church, Honiton - *Potential ‘Second Best’ Allocation*

- Historic England - Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- DCC note this site is within a steep area of Honiton, so infiltration may not be appropriate and would likely need to drain to a surface water sewer via a sewer requisition as there do not appear to be any watercourses in the vicinity.
- Honiton Town Council is concerned about the negative impact that the development could have on the landscape, heritage, and AONB.
- Site promoter support the allocation, but given the ability to deliver the site immediately, the site should be considered a preferred option.

LP_Honi_08 - Land at the south side of The Glen, Honiton - *Rejected Site*

- No comments

LP_Honi_09 - Former Honiton Showground, Langford Road, Honiton - *Rejected Site*

- Agent on behalf the site owner argues that the SA has dismissed Honi_09 too simplistically. They believes that Honi_09 is a suitable site for development, and that it would not have a significant negative impact on the AONB

landscape due to its low-lying location and surrounding infrastructure.

LP_Honi_10 - Land at Ottery Moor Lane - Preferred Allocation

- National Highways recommend the policy text includes consideration of noise and visual intrusion impacts from the A30, to ensure the well-being of future residents.
- Honiton Town Council believes that the development of Honi_10 would result in the loss of a green space that acts as a buffer between the new estate and the A30. The council also believes that the location is unsuitable for housing due to the proximity to the A30.

LP_Honi_12 - Land on the south-east side of Cuckoo Down - Lane and land at Lower Marlpits Farm, Honiton - Rejected Site

- Agree Honi_12 as rejected site, as this open green space is a valuable recreational resource and a scenic spot that should be preserved.

LP_Honi_13 - Middle Hill, Church Hill, Honiton - Potential 'Second Best' Allocation

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Potential impact on Grade 2* Church
- DCC note this site is within a steep area of Honiton, so infiltration may not be appropriate and would likely need to drain to a surface water sewer via a sewer requisition as there do not appear to be any watercourses in the vicinity.

- Honiton Town Council does not support the development of this site as it will adversely impact on the landscape, the adjoining heritage asset and the AONB.
- Local residents are concerned about the proposed development of a site within the AONB and the impact of the development on the landscape, the historic St Michael's Church, and the immediate local residents.
- Development will worsen traffic congestion, as the junction from Parsonage Lane to lower Marlpits Hill is already treacherous for vehicles and pedestrians.

LP_Honi_14 - Hurlakes, Northcote Hill, Honiton - *Potential 'Second Best' Allocation*

- The narrow rail bridge on Northcote Hill needs to be managed to allow for a pedestrian and cycle way to join with Monkton Road - and as the slip road from the A30 joins there, a segregated bi-directional cycle way on the south side would be beneficial also to GH/ED/39a
- Honiton Town Council suggested Honi_14 should be a preferred option.

Omission sites at Honiton

- None recorded.

Ottery St Mary and its future development

Draft Plan consultation

<p>Key issues raised in consultation:</p> <p>Devon County Council (DCC) state there is insufficient primary education capacity to support the proposed level of development in Ottery St Mary.</p> <ul style="list-style-type: none"> • DCC understand the King’s School is unwilling to expand unless it has a new school building and does not agree that the allocated land can facilitate the expansion of King’s School. • DCC state the town has most facilities and is a short distance to rail stations at Feniton and Whimble so support additional development – there are lots of rejected sites which could accommodate additional housing instead of a new community. • The majority of respondents object to further development on the basis that there is insufficient infrastructure (roads, public transport, health and education) to meet existing residents’ needs and no capacity for further growth. • Many respondents expressed concern at the inadequate existing road network into and through the town, with lack of pavements and single width carriageways being of particular concern • The Town Council and West Hill Parish Council feel strongly that a disproportionate number of houses have already been built in the town (increasing by 25% (700 houses) over the past 10 years) and allocations are higher than those in other towns with more facilities and better public transport links. They reiterate the concerns regarding lack of infrastructure and point out that the town has a very large hinterland which also relies on the town’s facilities. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The lack of school capacity/provision is noted and provision will need to be made to accompany site allocations • Many of these general issues relate to a lack of infrastructure to support new housing development, such as transport, education, healthcare, sports pitches, and sewage disposal. These matters will be considered in the forthcoming Infrastructure Delivery Plan which will highlight key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan. • Potential development sites re being assessed in accordance with a standard methodology which includes highway and landscape assessments. Even if all of the sites around Ottery are allocated this would not negate the need for a new town. In any case, DCC highways have objected to many of the sites to the north, east and south on highway capacity grounds. • There is only one existing employment site in the town and this will cease to be allocated in this local plan as it lies within the flood plain. There is an identified shortage of employment land. • The Green Wedge identified in the Neighbourhood Plan will also be identified in the new Local Plan (albeit it is likely to exclude any allocations) <ul style="list-style-type: none"> • LP_GH/ED/26- Land west of Cadhay Lane - Rejected Site • The site assessment addresses issues relating to landscape impact and settlement coalescence, concluding a significant impact from most of the site. • Moderate impacts on the historic environment • Whole site is within the Green Wedge identified in the neighbourhood plan and new local plan • Within the Mineral Safeguarding Area.
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<ul style="list-style-type: none"> • The Town Council request that a site for the new Tipton St John primary school is found within the village. • The East Devon AONB team state that any development that is proposed on the south and west (note- should this be East?) need to be carefully considered as to the effect that may have on the character and appearance of the AONB. Policy 22 should include wording to say that any proposal should be supported by an LVIA or landscape appraisal to consider the effects. • National Highways anticipate the strategic road network can accommodate the level of growth proposed at other Main Centres, Local Centres and Service Villages, but expect a high-level transport assessment for the entire Local Plan to provide evidence. • West Hill PC state there should be a Green Wedge over the whole area of Policy NP4 in Neighbourhood Plan to protect the separate identities of West Hill and Ottery. • No extra employment land is needed, there is unused capacity on existing sites <p>Other comments include:</p> <ul style="list-style-type: none"> • Proposals do not meet the requirements of the made neighbourhood plan. • Strawberry Lane is narrow with no pedestrian walkway. The strawberry Lane sites will have an impact on flooding in the area and can impact the cricket club and surrounding area. • It would be useful for EDDC to give the build density, houses per acre, for more meaningful comments. • Housing needs to be affordable to local people. More executive homes aren't needed. 	<ul style="list-style-type: none"> • A field by field assessment was not undertaken because the whole site is considered to be unacceptable. Notwithstanding this, only the fields immediately adjoining the football field and opposite the King's Reach Estate are considered to have any relationship to the town. All other fields are only included in the assessment at all because it was submitted as a single site. Individually they would have been sifted out at stage 2. • LP_GH/ED/27- Land south of Strawberry Lane - Preferred Allocation • The site does have a significant area of FZ3 at the southern end of the site so it would need to be subject to SFRA2, and the sequential and exception tests before being allocated. If the site can pass the sequential and exception tests the area at risk should be set aside as GI, with a buffer of at least 8m from the watercourse, free from built development. • Infrastructure matters affecting the wider town are addressed in the section relating to the whole settlement (above). • A landscape assessment has been undertaken for the site. This concludes that there will be significant intervisibility with the AONB and wider landscape but this will be seen in the context of existing built form. • The concerns regarding a lack of safe, off road pedestrian routes is noted. Paths can be provided through the King's Reach estate but these will be longer than the direct on road route along Strawberry Lane. • On site constraints can be overcome at the design stage or are matters to be resolved between those with rights over the land
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<ul style="list-style-type: none"> • Roads into and within the town are inadequate and too narrow for further traffic. • Schools are at capacity so children travel elsewhere, increasing traffic on the roads. • Inadequate local employment so commuters increase traffic to and from the town. • Public transport is inadequate. Further reductions to service mean it can't meet needs of existing residents. Housing to the west of the town will not be well served by buses. • Object to development of good quality agricultural land for housing. • Concern that wildlife will be impacted by building and loss of habitat. Networks of trees and hedges should be integral to new design. • The Doctors Surgery is over capacity and there are no NHS dentists. • Town centre architecture needs to be preserved and maintained, especially the small cottages which are falling into disrepair. • More car parking is needed in the town centre for shoppers and residents. • The Local Plan should reflect the need for true social/affordable housing along the lines of former council and housing association provision. • Proposed drainage of the Thorne Farm site using a pump is doomed to be a disaster with a potential flood risk to homes below this site. • Sites to the west make sense in terms of access. 	<p>and the landowner eg right to discharge from septic tank/soakaway.</p> <ul style="list-style-type: none"> • Support from the landowner is noted. • It is acknowledged that the existing rural character of the site would be lost if it is developed. <ul style="list-style-type: none"> • LP_GH/ED/29a NOTE this site is now numbered Otry_21-Gerway Farm (East) – Consulted on as a potential ‘Second Best’ Allocation for 40 houses. Now a preferred allocation for 70 houses • Support from the site promoter is noted. • Tip Hill and the Sidmouth Road are narrow and lack pedestrian footways however existing footpaths/pavements through the adjoining estates can be utilised and the site is within walking distance of facilities. Vehicle access could be achieved through the adjoining estate roads. • Landscape impacts are limited because the site sits below the skyline of the adjacent housing estate and will be seen in the context of built development. • On site constraints can be overcome at the design stage • Archaeology can be addressed by requiring assessment prior to commencing development • Flooding concerns can be addressed through design and layout. A SFRA will be required. <ul style="list-style-type: none"> • LP_GH/ED/29b- Gerway Farm (West) - <i>Rejected Site</i> <ul style="list-style-type: none"> • Supporting comments saying that the site is well located and will reduce traffic movements are noted.
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<ul style="list-style-type: none"> • Further development along the Sidmouth Road should not be permitted, the road is busy, inadequate and dangerous- especially to pedestrians. • Recently approved new quarry off Exeter Road will generate heavy industrial traffic that will impact on road capacity/speed/safety as will the associated new animal crossing. This should be taken into account before increasing road usage from new residents <p>Nb. Devon County Council’s consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.</p> <p>LP_GH/ED/26- Land west of Cadhay Lane - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Devon County Council support rejection of this site as within Mineral Safeguarding Area. • Ottery is less restricted than most for growth. • This site does have some issues regarding visual impact but this could be overcome by good design and tree planting. • The site promoter objects to the failure to allocate this site for housing and considers this to be unsound given the prevailing evidence regarding this site and the fact that adjoining land with similar characteristics is allocated for development. All of the negative effects of allocation could be mitigated. • The site promoter considers that a portion of the site could be allocated and now proposes that the eastern section only be allocated for housing. 	<ul style="list-style-type: none"> • The site is highly visible from the main road and in the wider landscape due to its sloping topography. • Vehicle access is not capable of taking the predicted volume of traffic safely. • The loss of agricultural land would need to be balanced against the housing benefits • Archaeology can be addressed by requiring assessment prior to commencing development • Part of the site is liable to flood. Sloping topography and substantial site size and irregular shape will increase runoff and worsen effects on land south of the site. • Overall it is considered that this amount of housing is excessive in this location. <ul style="list-style-type: none"> • LP_GH/ED/30 NOTE this site is now numbered Otry_18 Sidmouth Road, Junction with Gerway Lane - <i>Rejected Site</i> • The comments regarding road safety and the inadequacy of the access are noted. Highways advice that a pavement could be provided and this would be acceptable despite not meeting minimum width standards in places. It is not considered to offer “excellent” pedestrian and cycle connectivity. • Site is Grade 2 agricultural land which should not be developed if lower grade alternative sites are available. <ul style="list-style-type: none"> • LP_GH/ED/31 - Slade Farm - <i>Rejected Site</i> • Site is a greenfield site, Grades 2 and 3, which would extend into open countryside. • Development would be visible from a considerable distance. • Concerns regarding insufficient highway capacity are supported and shared by DCC Highways
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<ul style="list-style-type: none"> • Separation between west hill and Ottery would still be maintained and the two sites wouldn't have views of each other because of the established woodland. • No flooding problems. • Disagree with any further development in Ottery St Mary • This land is in the middle of the Settlement Containment zone defined in the adopted Neighbourhood Plan, and development would lead to the coalescence of Ottery and West Hill. • Object to development of good quality agricultural land • GH/ED/26 and LP_Otry_01 should be split and considered on a field by field basis rather than discounted due to their size. This would overcome concerns about the size of site, projection into the countryside and settlement coalescence • This site performs better than LP_Otry_01 in terms of topography, visibility, landscape impact, and access to services. The eastern part of GH/ED/26 should therefore be allocated for housing and could deliver up to 200 homes. <p>LP_GH/ED/27- Land south of Strawberry Lane - Preferred Allocation</p> <ul style="list-style-type: none"> • The Environment Agency advise that the site has a significant area of FZ3 at the southern end of the site, which is not acknowledged in the policy. The site would need to be subject to SFRA2, and the sequential and exception tests before being allocated. If the site can pass the sequential and exception tests the area at risk should be set aside as GI, with a buffer of at least 8m from the watercourse, free from built development. • Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this 	<ul style="list-style-type: none"> • An objector states that this site performs better than nearby Otry_15 as it has better pedestrian and cycle connectivity and should be allocated instead. That site is much smaller so traffic generation is much less, and performs much better in landscape and ecology terms which tips the balance in its favour • LP_GH/ED/32 - Church Path Field, East of Chineway Gardens - Rejected Site • No comments • LP_GH/ED/33- Land adjacent Greatwell Farm - Rejected Site • No comments • LP_GH/ED/34- Land at Littlewell - Rejected Site • It is agreed that insufficient highway capacity and flooding and sewage constraints make this site inappropriate for allocation. • LP_GH/ED/35 - Land at Ridgeway - Rejected Site • The access and highway constraints, visual impact and impact on flooding/flood prevention measures make this site inappropriate for allocation. • LP_Otry_01a - Barrack Farm - Rejected Site • It is agreed that this site is within Mineral Safeguarding Area. • The site represents an unacceptable extension of development into the countryside and is inappropriate on visual grounds, landscape impact grounds and heritage impact grounds. • Residents would be unlikely to walk or cycle to local facilities due to the distances involved. Part of this site was reconsidered at SPC on 29 Oct 24 but
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<p>proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <ul style="list-style-type: none"> • Woodland Trust advise that trees on the Ancient Woodland/Ancient Trees inventory (ref Veteran Pedunculate Oak (ATI no: 170156)) are within the site. Please ensure that necessary protections are in place for these trees and ancient woodland sites, including suitable Root Protection Zones and buffer zones of at least 50metres between any development and the ancient woodland. Please ensure that no development will take place which will adversely impact irreplaceable habitats according to the NPPF. • The promoter of the land supports the allocation • There is no sensible pedestrian access into town from this direction and poor vehicle access. • No foot path link so strawberry lane will be dangerous to pedestrians <ul style="list-style-type: none"> • This is beautiful, elevated green space and development will blight views from the town • Will detract from the historic setting and character of the town • Lack of infrastructure for existing residents- Dr's, dentists, school places etc • Heavy existing congestion in the area • Contrary to neighbourhood plan policies • Reasons for refusing previous planning applications still stand • Precedent for small domestic development being refused as detrimental to countryside 	<p>Members did not allocate it.</p> <ul style="list-style-type: none"> • LP_Otry_01b - Barrack Farm (east) - Preferred Allocation • This part of the site is more compact and closer to facilities than the whole site as submitted. Residents would be within walking and cycling distance of facilities. • This site would enable some employment land to be provided (existing land will no longer be allocated due to lying in the floodplain), increasing settlement self containment in the whole town • The impact on the green wedge is acknowledged but this area is already dominated by agricultural buildings and would not visually coalesce with West Hill due to topography and the intervening ridgeline. • Concerns about car parking at school times are noted but this site lies opposite King's School so pupils are likely to walk there. • The existing agricultural buildings are proposed for use/replacement with employment so proximity of cattle housing will not be an issue. • It is agreed that Ottery St Mar is well located to meet some of the District's housing need and this site is accessed from a highway with capacity and good links to the A30 and Exeter. • LP_Otry_09 - Land at Thorne Farm - Preferred Allocation • The differing views with regard to accessibility and facilities are noted but overall it is considered that this site has good access to the A30, and cycleway/footpath access to the town centre. • It is noted that trees on the Ancient Woodland/Ancient Trees inventory (ref ASNW at SY0824095422) are adjacent to the site. Please ensure that necessary protections are in place for these trees and ancient woodland sites, including suitable Root
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- Development would increase the flooding risk for residents of Salston Barton
- Impact of continued construction noise for the residents of Salston Barton.
- Existing obligations, e.g. road maintenance have not been met by landowner. Further development will exacerbate these issues. Suggests future planning obligations won't be met.
- Existing residents will lose privacy and rural setting of their homes
- Significant loss in value of existing homes xx
- Strawberry Lane is already over capacity
- Development will have a large ecological impact on the natural environment. Plans contain errors, omissions, and inconsistencies.
- Existing empty homes within Devon should be reused
- Flood Risk- existing issue, extra run-off will make this worse.
- Existing resident concerned that their underground basement well requires pumping during heavy rain and this will be more frequent as run off increases from development. This will impact adjoining houses. Developer needs to incorporate mitigation into the plans.
- Pedestrian routes into town around the area are already compromised with insufficient footpaths / areas where pedestrian access is via the roadway - the footpath muted when the Bovis Kings Reach estate was built not having come to pass.
- It is very rural in character not semi rural and does a town need rounding off.
- Drains are at capacity
- Roads are single vehicle width and flood impassably.

Protection Zones and buffer zones of at least 50metres between any development and the ancient woodland. Please ensure that no development will take place which will adversely impact irreplaceable habitats according to the NPPF.

- It is noted that the site has an area of FZ3 and part designated main river along the northern boundary. If the site can pass the sequential test the area at risk should be set aside as GI, with a buffer of at least 8m from the watercourse, free from built development. As the site is adjacent to Cadhay Bog the policy should seek to secure BNG that can help expand the nature corridor.
- Educational use of part of the site, to meet the need for school provision, will be a requirement of the allocation
- Various concerns about the proximity of the quarry are noted but these are operational matters.
- **LP_Otry_10 - Land north and south of Salston Barton - Preferred Allocation (northern section only)**
- It is noted that the Environment Agency advise that the site should not include the parcel of land to the south (and this is not proposed for allocation for development but may be used for flood management purposes as a result). And the site would need to be subject to SFRA2, and the sequential and exception tests before being allocated.
- It is noted that the Woodland Trust advise that trees on the Ancient Woodland/Ancient Trees inventory (ref Veteran Oak (ATI no: 170186)) are within the site and should be protected accordingly.
- Infrastructure matters affecting the wider town are addressed in the section relating to the whole settlement (above).

<ul style="list-style-type: none"> • Will lead the hamlets to coalesce • This is rural land that provides a beautiful natural habitat and green space amongst what is rapidly becoming a built up urban area. • Will significantly impact views from across the valley. • The objectivity of the Sustainability Appraisal is compromised if its author has promoted an unpublished objective (to join OSM with the hamlet of Salston) rather than appraised the constraints. • Construction noise for many more years above the 7 years construction for Kings Reach • Mental health impacts including noise and fear of flooding • Water quality impacts on the R. Otter • Possible land stability for properties at Salston Barton • Significant visual impact from East Hill AONB, whilst most of Salston is hidden in lower ground • Concern expressed re probity and inconsistency as other sites with the same or lesser constraints have been discounted • Concern that bringing forward small parcels/sites avoids the need for EIA but the effects should be considered cumulatively • This site is heavily constrained by many overhead services • Site does not have a deliverable pedestrian cycle link to the town centre. • Lovely safe green space with a sociable footpath for meeting neighbours and for dog walking, it has lovely wildflowers, old native mixed hedges and ancient and veteran oak trees. If it's soil health (porosity and no compaction) is good, it is an 	<ul style="list-style-type: none"> • A landscape assessment has been undertaken for the site. This concludes that there will be significant intervisibility with the AONB and wider landscape but this will be seen in the context of existing built form. • The concerns regarding a lack of safe, off road pedestrian routes is noted. Paths can be provided through the King's Reach estate but these will be longer than the direct on road route along Strawberry Lane. • On site constraints will be addressed at the design stage or are matters to be resolved between those with rights over the land and the landowner eg right to discharge from septic tank/soakaway. • It is acknowledged that residents will be subjected to a degree of noise and disturbance whilst development is ongoing. • It is acknowledged that the existing rural character of the site would be lost if it is developed. • LP_Otry_15 - Land at Bylands, Slade Road - Preferred allocation • It is acknowledge that no pedestrian or cycle path extend as far as the site, however it is considered to be acceptable given the quiet nature of the lane, the small number of dwellings proposed and the proximity of pavements. • The high pressure gas pipeline has statutory safeguarding zones which will be adhered to. • Omission sites at Ottery St Mary • Splitting site GH/ED/26, and allocating the northern/eastern section only has been considered but has been rejected due to landscape and settlement coalescence impact.
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essential water capture site to prevent run off into existing homes.

- Sewerage at Salston Barton – Houses 11 to 14 have soakaway system that requires the paddock adjacent to the drive (part of LP Otry 10).
- Houses 1 to 10 have a bacteria digester system. This is at maximum capacity and can be overwhelmed if there is too much runoff getting onto the system.

LP_GH/ED/29a NOTE This site is now nubered Otry_21 - Gerway Farm (East) - Potential 'Second Best' Allocation

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- A site promoter described the assessment exercise that identified it as a '2nd' choice site as flawed and considers the site to be unconstrained, available and deliverable. It has been overlooked in favour of less sustainable, less viable and less deliverable sites elsewhere around the settlement.
- Several objections on the basis that existing pedestrian access along Tip Hill is very dangerous, especially for children walking to school.
- Numerous objections state that more houses will increase traffic on narrow and dangerous roads into the town This field is realistically quite well suited to further development it has good access from the main road which Highways were happy with when the Gerway close was approved no too long ago.

Its size dose tend to naturally act to reduce the speed of traffic.

- The wildlife is pretty bland in the area
- There is a regular bus service from walking distance away.
- Site has the capability to provide good pedestrian links into town as well as the open countryside for people's health and wellbeing.
- It sits in sloping ground away from the road and the houses on the Winters Lane /Oak Close together with Clairemont Field will still dominate the skyline providing this potential development will limit landscape issues.
- Surface water from any development must be controlled to a rate of natural run off and this site has a route to the river which doesn't interfere with any other properties.
- It is walking distance to most services in town and the primary school.
- This would provide a compact development extension to Ottery St. Mary
- In all given the location of this site I feel it has a lot to offer for a sustainable development.
- Object to loss of good quality agricultural land
- Development should be concentrated on Exeter side of the town, otherwise commuter traffic has to go through the town
- Unacceptable impact on wildlife
- The stream which runs between Gerway and the properties of Claremont Field already floods, futher run off will increase the existing damage/erosion to properties and gardens in Claremont.
- Inadequate infrastructure for more residents in OSM. Schools doctors dentists all full.

- Site access onto narrow country lane is unsafe
- Area is criss-crossed with electricity wires on poles and small pylons.
- Buffer should be left adjacent to hedgerows
- Landscaping is needed to minimise visual impact for Gerway Close house owners.
- The promoters of the site state that land is unconstrained and readily developable with the access already formed. It is the closest of all of the proposed allocations to the town centre and to the services and facilities within OSM with excellent pedestrian and cycle connectivity. It should be elevated from a Second Choice Allocation to a Preferred Allocation, increase the flexibility and deliverability of the Plan. There is no sound reason why this should remain as a Second Choice.

LP_GH/ED/29b- Gerway Farm (West) - Rejected Site

- Several supporting comments saying that the site is well located, within walking distance to town/ shops schools bus stop etc. And this will help reduce traffic movements.
- The site is not visible from the main road so is a good option for development.
- Highly visible in the landscape
- Good potential highway access
- The wildlife is pretty bland in the area partly because of few field boundary's to it.
- There is a regular bus service from walking distance away.
- It has the capability to provide good pedestrian links into town as well as the open countryside for peoples health and wellbeing.

- It sits in sloping ground away from the road and the houses on the Winters Lane /Oak Close together with Clairemont Field will still dominate the skyline providing this potential development will limited landscape issues.
- Surface water from any development must be controlled to a rate of natural run off and this site has a route to the river which doesn't interfere with any other properties .
- This would provide a compact development extension to Ottery St. Mary which is an established settlement and lessen the further need for a new town.
- Part of this site, the eastern-most site, has already had planning applications refused, and there is a current live planning application. It is quite unsuitable, mainly because of the poor pedestrian access and highways impact.
- Object to development of good quality agricultural land
- Several objections on highway safety grounds
- No safe pedestrian link into the town from this site

LP_GH/ED/30-NOTE this site is now numbered Otry_18

Sidmouth Road, Junction with Gerway Lane - *Rejected Site*

- Several objections to any further development along the Sidmouth Road on highway/pedestrian safety grounds
- The narrow, winding lane southwards towards Bowd is already busy (particularly during school term times) and includes farm vehicles, school buses and large lorries- difficult to pass and lots of reversing/tailbacks.
- The road along Winters Lane/Longdogs Lane junction is very dangerous
- Tip Hill is a busy road with effectively one way traffic due to parking on one side, pavement is so narrow pedestrians have to pass in the road

- Insufficient infrastructure to accommodate more residents
- The promoters of the site state that land is unconstrained and readily developable with the access already formed. It is the closest of all of the proposed allocations to the town centre and to the services and facilities within OSM with excellent pedestrian and cycle connectivity. It should be elevated from a Second Choice Allocation to a Preferred Allocation, increase the flexibility and deliverability of the Plan. There is no sound reason why this should remain as a Second Choice.

LP_GH/ED/31 - Slade Farm - *Rejected Site*

- Unacceptable location and traffic impact through Yonder St.
- This site has already the subject of an unsuccessful planning application. It would not constitute sustainable development, being remote from the town centre facilities and unacceptable traffic impact.
- We need more good quality houses in Ottery.
- The dismissed appeal covered a much larger area, the western part is highly accessible and sustainable with good pedestrian/cycle access via Knightstone Lane, close to the town centre and facilities.
- A smaller scale scheme would sit well within the landscape and with the eastern higher field providing plenty of land for landscape planting and biodiversity net gain, etc,
- This site should also be a Preferred Allocation for circa 30 dwellings and would perform better than OTRY15, which has no pedestrian/cycle connectivity, so the justification either for the allocation of OTRY15 or for the rejection of GH/ED/31 must be wrong.

**LP_GH/ED/32 - Church Path Field, East of Chineway Gardens
- *Rejected Site***

- No comments

LP_GH/ED/33- Land adjacent Greatwell Farm - *Rejected Site*

- No comments

LP_GH/ED/34- Land at Littlewell - *Rejected Site*

- Wrong side of town regarding traffic.
- Water and sewage issues.
- This site doesn't make sense as an allocation

LP_GH/ED/35 - Land at Ridgeway - *Rejected Site*

- Poor access
- Generation of traffic along narrow lanes (Ridgeway & Higher Ridgeway) which are in part dirt tracks or too narrow and widening roads would involve compulsory purchase of gardens.
- Development would generate large volumes of traffic down Butts Road and through the town centre along North Street which lacks capacity.
- The existing Redrow/Butts Road estate is visually intrusive and is visible from the Ottery - Honiton road. Extra development would increase this.
- The Redrow/Butts Road extension required provision of stormwater detention facilities as water management is an issue and an expanded estate would overwhelm existing flood prevention measures.

LP_Otry_01a - Barrack Farm - *Rejected Site*

- Devon County Council support rejection of this site as within Mineral Safeguarding Area.

- The site has good road links into and out of Ottery St. Mary, and should be considered as part of the solution to East Devon housing needs providing a decent corridor of development together with Ottery 09 and Otry 01b.
- Visual impact could be addressed through tree planting
- It is ordinary farmland with little or no ecology.
- The likelihood of coalescence between West Hill and Ottery is low considering the topography of the land and the established woodland.
- It is close to the secondary school and 1555m from the Medical centre.
- It has good road links and Ottery Town council has for years wanted a roundabout to temper the traffic speed this was proposed together with a school in a previous planning application on Ottery 09 which was supported by officers and wrongly refused.
- If we have to develop in East Devon the majority of our towns are in the valleys surrounded by rising ground often which is designated ANOB which often means any development extension of a established town is going to be seen , "it is inevitable " Design and landscaping must be used to mitigate such issues but to use this reasoning to force development away and onto less suitable areas must be questioned.
- This is in the Settlement Containment Zone identified for protection in the adopted Neighbourhood Plan. Development would constitute ribbon development and would lead to coalescence of Ottery and West Hill.
- The site is remote from the town centre facilities, which are already under significant pressure.

<ul style="list-style-type: none">• GH/ED/26 and LP_Otry_01 should be split and considered on a field by field basis rather than discounted due to their size <p>LP_Otry_01b - Barrack Farm (east) - Preferred Allocation</p> <ul style="list-style-type: none">• Process isn't democratic• Applications for housing should be determined as they are received not planned years into the future• Lack of infrastructure• Doesn't meet the 20 minute neighbourhood standard• Strawberry Lane is already unsafe to walk along for the local children (they have to wait for buses here) and pedestrians due to narrow width and lack of pavements.• Ottery has already had a great deal of development relative to its size.• The traffic is awful around Exeter Road / Strawberry Lane at school start/end times.• Cars already park all along the road beside the Kings playing fields, down to Salston Cross including in the passing places rendering them very unsafe and sometimes impassable for buses.• West Hill Parish Council (and numerous others) note this site encroaches into the Settlement containment area in Neighbourhood Plan Policy NP4 so is unacceptable.• There has been land allocated for employment development at the Finnimore Industrial for 25-30 years which remains undeveloped. No reason is given for additional land being required.• No consideration has been given to the proximity of the farming activities at Barrack Farm where cattle are bred and fed in the large buildings, which generate noise, flies and smells from cattle waste and silage clamps.	
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- There is a combined sewer in Exeter Road/Barrack Road which flows into a storm tank and discharges into the River Otter at peak times. It should be replaced with separate foul and surface water sewers before any more development takes place to the west of Ottery.
- Ottery St. Mary is well placed to contribute to the housing need in East Devon, it has established services and has good access into the city of Exeter via a dual carriageway.
- If we are going to have houses and employment this land is probably the most suited because of its location on a main road. It has good links into town and is on the main bus route and not too far from Feniton train station.
- The issue raised by some about coalescence with West Hill is unfounded due to the distance and topography of the ground and established woodland between the sites.
- This site generally has a low impact regarding landscape sensitivity and any historic activity can be assessed by an archaeology survey.
- This site sits directly above the Kings Reach estate in Ottery with a low laying road directly beneath it which floods regularly. This surface water then runs down into Kings Reach causing issues for the residents who live there. This site is within the Settlement Containment zone described in the Neighbourhood Plan. It should not be developed - it would only encroach on the separation between Ottery and West Hill.
- Site is remote from the town centre and facilities, which are unable to cope with additional development
- Local amenities and infrastructure for the town cannot cope with pressure from more houses in the town.

- Inadequate road access compounded by extensive parking on the lane which dangerously obstructs exit from the housing estate already present. Overflow parking from the nursing homes adds to the problem.
- There are no school spaces for the residents of new homes.
- This will urbanise the countryside setting of the town
- No need/demand for industrial. Detailed assessment is needed
- Recent agriculturally tied dwelling was approved based on farming this land- will this be revoked?
- Light pollution will damage the environment
- GH/ED/26 and LP_Otry_01 should be split and considered on a field by field basis rather than discounted due to their size
- The delivery of 1.25 hectares of employment land on this site (as with every other proposed mixed use development site) is unlikely to be delivered.
- Residential development is not appropriate given the existing use of this site.

LP_Otry_09 - Land at Thorne Farm - Preferred Allocation

- Devon County Council, as landowner, supports allocation as it has good access to the A30 avoiding the need to take traffic through the town centre, there are good cycleway/footpaths to the town, which has good local facilities and the site is outside of the AONB
- Woodland Trust advise that trees on the Ancient Woodland/Ancient Trees inventory (ref ASNW at SY0824095422) are adjacent to the site. Please ensure that necessary protections are in place for these trees and ancient woodland sites, including suitable Root Protection Zones and buffer zones of at least 50metres between any development

and the ancient woodland. Please ensure that no development will take place which will adversely impact irreplaceable habitats according to the NPPF.

- The Environment Agency advise that the site has an area of FZ3 and part designated main river along the northern boundary. If the site can pass the sequential test the area at risk should be set aside as GI, with a buffer of at least 8m from the watercourse, free from built development. As the site is adjacent to Cadhay Bog the policy should seek to secure BNG that can help expand the nature corridor.
- Devon County Council note this site is within a Mineral Consultation Area but consider it unlikely that the allocation will impact upon mineral resources in the area.
- West Hill Parish Council note a planning application was refused recently on this site, partly on landscape grounds, so it is difficult to see how this could be overcome.
- A large number of objectors stated that this site should be used for education purposes. It adjoins the school/should be used for a relocated Tipton St John School/King's should be expanded
- As far as sites go this one has merit.
- Doesn't meet the 20 minute neighbourhood standard
- DCCs need to raise funds doesn't justify this development
- Ottery has reasonable bus service.
- Good road links.
- Safety concerns around potential conflict between quarry and housing traffic
- Ottery needs housing to keep the town centre going i'm sure foot fall has decreased due to covid and internet shopping.

- Traffic issues, Ottery is better than other towns and cities.
- This site could provide a roundabout and pedestrian links to town.
- Visible from East Hill, but so's Dartmoor and good design and planning would mitigate any issues.
- These roads are typical for Devon, just drive appropriately.
- Houses have to go somewhere, make them as good as possible.
- There is going to be a new town in a totally wrong place because of the nimby brigade.
- Lack of infrastructure in the town
- Already flooding issues
- Lack of employment land.
- Ottery St Mary does NOT have good transport links with anywhere, buses are intermittent, not arriving on time or not at all, and journey times are between 50 and 60 minutes to travel 11 miles.
- The nearest train station is at Feniton 3 miles away where the trains between Exeter and London stop every 2 hours in either direction. To access Feniton station requires private transport from Ottery.
- There has been considerable housing development on the west of Ottery already, none of which has resulted in improved pedestrian and cycle links with the town centre. The pedestrian bridge over the Otter needs to be lit for pupils to access schools
- Paragraph 6.35 - This plan provides no policy proposals to ensure delivery of "all necessary infrastructure", or any infrastructure.

- Paragraph 6.37 is grossly misleading. This Draft Plan does nothing to address traffic in the town centre and the surrounding inadequate roads.
- Policy Otry_09 does NOT safeguard the land reserved for expansion of The Kings School. The Policy proposes 90 dwellings, nothing else, which is contrary to Neighbourhood Plan Policy NP24. The Ottery St Mary Draft LP map does not show any land reserved for education purposes.
- The planning application made by Devon CC in 2020 for 150 dwellings and a primary school was refused. Funding a new primary school by Devon CC selling their land with planning permission for housing is of no relevance to allocating land for housing in a Local Plan.
- Because of its location up a steep hill and proximity to speeding traffic, the site is not suitable for a new primary school. Also, recently Devon CC have secured government funding to replace the Tipton St John primary school in Tipton St John.
- No consideration has been given to the resulting generation of additional traffic using Barrack Road and Cadhay Lane; the latter, which has no footways, is not suitable for additional vehicular traffic and is already a danger for pedestrians and cyclists.
- There should be no access to the proposed site to/from Cadhay Lane.
- The Plan is proposing at least 240 new homes to the west of Ottery without any consideration for providing adequate services and infrastructure. This is grossly negligent/the plan is unsound.

- The topography of the land to the north is unsuitable for development due to it being a steep sloping area. Concerned the runoff of rain will flood houses lower down.
- The land in question supports a variety of wildlife including protected species e.g. badgers, dormice
- Development of improved educational provision should not be dependent upon selling land off for housing development in order to fund capital investments in an enlarged school.
- A small amount of housing might be acceptable as long as a new school is delivered
- Local amenities and infrastructure are over capacity
- Quarry – with the quarry now agreed, there are severe concerns about how the quarry operations will cause water pollution. This proposed site is directly below the quarry site, so there could be a major safety concern.
- Next to a site of special scientific interest, namely the Cadhay bog. Even if houses were not built directly next to it, there will be human disturbance, litter etc which could affect this sensitive site, which has taken hundreds of years to form.
- This site is visually prominent
- One respondent submitted a very detailed response querying the need to retain the site for a new primary school and raising a number of technical concerns (particularly re flooding, highways and feasibility) which are beyond the scope of the local plan
- Increased noise and light pollution- detrimental to human rights Act and right to quiet enjoyment
- Will dominate properties in Cadhay Close
- Impact on Grade 1 listed Cadhay House

- Nearby quarry will be detrimental to new residents/pupils health

LP_Otry_10 - Land north and south of Salston Barton - Preferred Allocation (northern section only)

- The Environment Agency advise that the site should not include the parcel of land to the south. The entire southern parcel is within FZ3 whilst the eastern edge of the northern parcel fringes FZ3. The site would need to be subject to SFRA2, and the sequential and exception tests before being allocated.
- Woodland Trust advise that trees on the Ancient Woodland/Ancient Trees inventory (ref Veteran Oak (ATI no: 170186)) are within the site. Please ensure that necessary protections are in place for these trees and ancient woodland sites, including suitable Root Protection Zones and buffer zones of at least 50metres between any development and the ancient woodland. Please ensure that no development will take place which will adversely impact irreplaceable habitats according to the NPPF.
- There is no sensible pedestrian access into town from this direction and poor vehicle access.
- No foot path link so strawberry lane will be dangerous to pedestrians
- Will increase flood risk, especially to Salston Lodge and low level bungalows at Salston Ride
- Properties at Salston Barton have the original wells in their basements and require pumps to remove excess water. This will be exacerbated by floodwater/run off
- Unacceptable impact on listed Salston Lodge

- Lack of infrastructure for existing residents- Dr's, dentists, school places etc.
- Heavy existing congestion in the area
- Contrary to neighbourhood plan policies
- Reasons for refusing previous planning applications still stand
- Precedent for small domestic development being refused as detrimental to countryside
- Development would increase the flooding risk for residents of Salston Barton
- Impact of continued construction noise for the residents of Salston Barton.
- Existing obligations, e.g. road maintenance have not been met by landowner. Further development will exacerbate these issues. Suggests future planning obligations won't be met.
- Existing residents will lose privacy and rural setting of their homes
- Significant loss in value of existing homes
- Strawberry Lane is already over capacity
- Development will have a large ecological impact on the natural environment. Plans contain errors, omissions, and inconsistencies.
- Existing empty homes within Devon should be reused
- Flood Risk- existing issue, extra run-off will make this worse. Requires a physical survey not just a desk top assessment
- Roads are single vehicle width and flood impassably.
- This is rural land that provides a beautiful natural habitat and green space amongst what is rapidly becoming a built up urban area.
- Will significantly impact views from across the valley.

- The objectivity of the Sustainability Appraisal is therefore compromised if its author has promoted an unpublished objective (to join OSM with the hamlet of Salston) rather than appraised the constraints.
- Construction noise for many more years above the 7 years construction for Kings Reach
- Mental health impacts including noise and fear of flooding
- Water quality impacts on the R. Otter
- Possible land stability for properties at Salston Barton
- Significant visual impact from East Hill AONB, whilst most of Salston is hidden in lower ground
- GH/ED/26 and LP_Otry_01 should be split and considered on a field by field basis rather than discounted due to their size
- Concern expressed re probity and inconsistency as other sites with the same or lesser constraints have been discounted
- Concern that bringing forward small parcels/sites avoids the need for EIA but the effects should be considered cumulatively
- Lovely safe green space with a sociable footpath for meeting neighbours and for dog walking, it has lovely wildflowers, old native mixed hedges and ancient and veteran oak trees. If its soil health (porosity and no compaction) is good, it is an essential water capture site to prevent run off into existing homes.
- Sewerage at Salston Barton – Houses 11 to 14 have soakaway system that requires the paddock adjacent to the drive (part of LP Otry 10).

<ul style="list-style-type: none"> Houses 1 to 10 have a bacteria digester system. This is at maximum capacity and can be overwhelmed if there is too much runoff getting onto the system. <p>LP_Otry_15 - Land at Bylands, Slade Road - Preferred allocation</p> <ul style="list-style-type: none"> There is no pedestrian access to this site, which is on a narrow unlit country lane. Close to high-pressure gas transmission pipeline Site previously refused on appeal and those reasons still apply <p>Omission sites at Ottery St Mary</p> <ul style="list-style-type: none"> Site GH/ED/26 should be split and the northern/eastern section only be allocated 	
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Seaton and its future development

Draft Plan consultation	
<p>Key issues raised in consultation:</p> <p>General issues</p> <ul style="list-style-type: none"> Seaton Town Council would like more affordable housing and no loss of employment land. The Environment Agency welcome the designation of a coastal change management area has been designated on the east side of the mouth of the Axe and the western side of town. 	<p>Officer commentary in response:</p> <p>General issues</p> <ul style="list-style-type: none"> Many of these general issues relate to a lack of infrastructure to support new housing development, such as transport, education, healthcare, sports pitches, and sewage disposal. These matters will be considered in the forthcoming Infrastructure Delivery Plan which will

<ul style="list-style-type: none"> • Devon County Council note the town has most facilities so support the proposed small level of development – access to new and existing cycle routes should be provided from proposed sites. • DCC feel that some of the rejected sites should be reconsidered as would be better for transport than a new community, allowing short-distance sustainable trips to local facilities. • National Highways anticipate the strategic road network can accommodate the level of growth proposed at other Main Centres, Local Centres and Service Villages, but expect a high-level transport assessment for the entire Local Plan to provide evidence. • The East Devon AONB team state that Seaton is set within stunning natural landscape that includes the Jurassic Coast World Heritage site, Seaton Wetlands and adjacent to the East Devon AONB. Any development as proposed by Policy 23 should have regard to these designations and be supported by an assessment such as an LVIA or landscape appraisal to assess how realistic the options for development are. • The relative remoteness of Seaton compared to other Tier 2 settlements – distance from Exeter, lack of train station, poor bus service, poor road network, coastal location – makes it much less suitable for housing and employment development. • As a large town, Seaton should have more houses, jobs and services built around it. 	<p>highlight key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan.</p> <ul style="list-style-type: none"> • Aspirations for more affordable housing are noted and requirements are included within Local Plan policy, subject to viability. • The emerging Local Plan supports employment land, with two sites already benefitting from planning permission (Seat_04, 06) and the provision of 2.2 hectares of employment land within Seat_05. • The emerging Local Plan recognises the relative remoteness of Seaton and its outstanding natural landscape, which limits the scale of development that is appropriate at the settlement. • Local Plan policies support development of brownfield sites. • The Green Wedge to prevent the coalescence of Seaton and Colyford will be retained, albeit covering a slightly reduced area. <p>LP_Seat_01 – Clay Common, Seaton – Rejected Site</p> <ul style="list-style-type: none"> • The site assessment addresses issues relating to landscape impact, including viewpoints from the SW Coastal Path and AONB, concluding a high/medium landscape sensitivity. • Ecological impacts, including location within the Beer Quarry and Caves SAC bat consultation zone, sustenance zones, landscape connectivity zone, are also noted in the site assessment which predicts a significant moderate adverse effect. • The loss of the site as a firebreak is not considered to be relevant in assessing this site, given the lack of evidence that this is an issue in the area. <p>LP_Seat_02 - Land at Barnards Hill Lane, Seaton - Preferred Allocation</p>
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<ul style="list-style-type: none">• Poor bus service timings make it virtually impossible for people working normal office hours to travel from Seaton to other areas.• There are not enough jobs in Seaton for existing residents of working age so unless sufficient additional jobs can be created, there will be out-commuting.• The seafront and town centre feel unloved and badly need some inward investment from housing and employment.• Develop existing brownfield sites, such as the harbour and Tower areas, rather than the countryside.• Seaton is unique in being bounded in two directions – the sea and the Wetlands – meaning its housing number should be reduced.• The proposed 217 homes without any additional infrastructure such as new schools, doctor’s surgeries and transport links is unacceptable and unsustainable for the town.• Identify land for holiday accommodation, such as Seaton Heights.• Developers that fail to complete existing permissions should not be allowed to apply for new permissions, Bovis have taken 10 years and counting to build 222 houses.• Protect nature to support eco-tourism.• Seaton is at risk of flooding, partly due to soil type which impedes drainage, so do not make decisions until the Water Cycle Study and DCCs surface water report are available – concerned that SuDS will not perform very well.	<ul style="list-style-type: none">• Barnards Hill Lane is very narrow with no footways, but these issues could possibly be addressed in developing the site. Nevertheless, Barnards Hill Lane is not required to access the site, which can be achieved via Poplar Tree Drive to the south, with further detail required through a planning application. Note: the HELAA Panel expressed concern about land ownership on land bordering Poplar Tree Drive and whether access can be achieved from this road.• Small areas of surface water flood risk beyond site to east and south are noted, and Local Plan policies address this issue.• Support from the landowner is noted.• Local Plan policies on design and housing mix will inform whether or not bungalows are appropriate for this site; and development should be designed to avoid adversely impacting upon the amenity of existing dwellings to the east and south.• The site is Grade 3 agricultural land, which must be balanced with other planning issues.• There are good employment opportunities nearby, including Harepath Road industrial estate (and proposed LP allocation to its north), school, hospital, and town centre.• The northern part of the site is within bat pinch point, leading to a significant moderate adverse effect on ecology.• There are no records of Roman and prehistoric interest in the Historic Environment Record, but other national and Local Plan policies will ensure appropriate archaeological investigations are carried out.• Although the site is part of the Green Wedge in the adopted Local Plan 2013-31, the site assessment concludes that developing the site will not damage settlement identity or lead to settlement coalescence.
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- Proposed development will be an enormous burden for sewage disposal, leading to more pollution of the River Axe and the beach.
- Need improved healthcare as Seaton hospital has no beds and is limited to physiotherapy and a few clinics; A&E is some distance away.
- Appreciate need for new houses but wonder whether there will be a fair number of affordable homes.
- Construction noise will adversely affect mental health of local residents.
- The Plan makes no reference to the woeful under provision of outdoor play space, with no additional provision for much needed new football pitches.
- Existing parking problems around the school will be made worse by more development.
- Seaton has seen under-investment, with a lagging town centre and insufficient infrastructure and facilities.
- Seaton needs more affordable housing, but it needs to be attractive and eco-friendly.
- Do not allow any building on the green wedge between Seaton and Colyford.

LP_Seat_01 – Clay Common, Seaton – Rejected Site

- Seaton Town Council support not allocating this site.
- Support the rejection of this site due to its elevated character meaning an adverse landscape impact from viewpoints such as the Coastal Path and AONB.
- Support rejecting this site due to wildlife impact, including within bat corridor.

LP_Seat_03 - Land to the south of Harepath Hill, Colyford - Potential 'Second Best' Allocation

- Support from the Town Council and prospective developer is noted and agreed, including the provision of much-needed sports pitches on site.
- The Historic Environment Site Assessment (HESA) identifies a potential impact upon the significance of Grade II listed Harepath Farm which overlooks the site from the north east; and a network of ditches and gullies across the site in the Historic Environment Record. This leads to a medium impact on the historic environment, with no significant effects which cannot be mitigated.
- This site is in an accessible location, with 10 out of 12 facilities within 1,600m of site (excl. Colyton Grammar), and hourly or better bus route runs along eastern boundary, with existing bus stop on south east edge of site.
- Small areas of surface water flood risk on road to east and north, so development should ensure run-off does not exacerbate problems in these areas.
- There has not been a Planning Inspector's appeal decision on this site, but a proposal for 149 dwellings and a Kingdom Hall (09/0179/MFUL) was refused by the Council on this site due to being outside development boundary, within green wedge, landscape impact, design/layout, harm to setting of Harepath Farm, and absence of legal agreements for off-site open space and sewage treatment works. However, this decision was based upon this specific proposal, and the policy background has changed significantly since 2009, so it does not impede allocating this site.
- The site is best and most versatile agricultural land (Grade 2), and land of poorer quality should be preferred, and this is considered in whether to allocate the site or not.

- This site should not be developed as it will mean a loss of a firebreak between existing built development and forest beyond.

LP_Seat_02 - Land at Barnards Hill Lane, Seaton - Preferred Allocation

- Seaton Town Council do not object to allocating this site but need improvements to Barnards Hill Lane and drainage.
- Seaton Town Council note there is an opportunity to make this part of Barnards Hill Lane two way traffic or block the access to the A3052 and make other access arrangements.
- The landowner supports the allocation and reconfirms the land is available for development.
- If bungalows are built on this site, it will only attract retired people which will put pressure on already overstretched services.
- Consider restricting the type of homes to bungalows to fit in with the adjacent estate.
- Barnards Hill Lane regularly floods, and there is a risk of flooding of properties to the east of this site due to topography and limited capacity of Mercia mudstone to allow infiltration.
- Object as developing the site will cause overlooking of existing houses to the east.
- There are several Oak trees on the boundary which are home to owls and bats.
- This site is productive agricultural land which will be lost forever.

- The impact of the site upon wildlife, and bats in particular, is noted, being within Beer Quarry and Caves SAC bat consultation zone, sustenance zones, landscape connectivity zone, bats pinch point, with a roost around 500m to north. This results in a significant moderate adverse effect overall, requiring considerable mitigation.
- Although the site is part of the Green Wedge in the adopted Local Plan 2013-31, the emerging Local Plan has reviewed this and concludes that developing the site will not damage settlement identity or lead to settlement coalescence.
- There are good employment opportunities nearby, including Harepath Road industrial estate (and proposed LP allocation to its north), school, hospital, and town centre.
- Devon County Council state there are no objections in principle to the residential development of this site from a highway point of view.

LP_Seat_04 - Land off Harepath Road at end of Fosseway Park, Seaton - Planning Permission Granted

- Support from the Town Council is noted.

LP_Seat_05 - Land off Harepath Road, Seaton - Preferred Allocation

- Support from Seaton Town Council and prospective developer for mixed use development of Seat_05 alongside Seat_03 is noted.
- The provision of off-site footpaths is more appropriately considered through a planning application but note that a new walking/cycling route is under construction east of Colyford Rd and on to the Wetlands which will improve the accessibility of the site.
- The developers' support an increase to around 130 dwellings results in 32 dwellings per hectare, which is considered appropriate for this edge of settlement site.

<ul style="list-style-type: none"> • Concerned about traffic impact on surrounding estate roads such as Poplar Tree Drive. • Unaware of good opportunities for employment in this area. • Object as within bat pinch point. • Object as there is significant Roman and prehistoric interest. • Object as part of the historic Green Wedge. <p>LP_Seat_03 - Land to the south of Harepath Hill, Colyford - Potential 'Second Best' Allocation</p> <ul style="list-style-type: none"> • Seaton Town Council want to see Seat_03 and Seat_05 developed together – Seat_03 should be a preferred allocation which provides badly needed sports pitches. • Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. • Developer (Baker Estates) support this allocation for around 70 dwellings and recreational use. • Local people have been objecting to this site for years, and the issues remain: vulnerable to flooding, pollution of River Axe, sewage outflow, ribbon development, impact on Wetlands, too far from the town. • Planning Inspector dismissed this site due to high landscape sensitivity and adverse ecological impact on bats. • Object as would mean loss of best and most versatile agricultural land. 	<ul style="list-style-type: none"> • The HESA notes views from the site of Grade II listed Harepath Farm and some archaeology findings on the site but overall medium impact: no significant effects that cannot be mitigated. • Although a Planning Inspector dismissed an appeal on this site back in 2014, this decision was “finely balanced”, based upon a specific proposal, and the policy background has changed significantly in that time, so it does not impede allocating this site. • The site is part of the Green Wedge in the adopted Local Plan 2013-31, but the site assessment states that developing the site will not damage settlement identity or lead to settlement coalescence with Colyford, with a medium sensitivity to new development. • The site has a low fluvial and surface water flood risk, whilst sustainable drainage issues will be investigated and addressed through a planning application. • DCC Highways consider that suitable access can be obtained into the site; and the National Cycle Route also goes through Seaton Wetlands thus avoiding Colyford Road. • The site is Grade 2 (best and most versatile) agricultural land, and areas of poorer quality land should be preferred – this has been considered in the site selection process. • This part of the River Axe is outside the catchment where phosphate levels restrict development. • The impact on wildlife, particularly upon bats, will need to be addressed in more detail through a planning application. • There are good employment opportunities nearby, including Harepath Road industrial estate (and proposed LP allocation to its north), school, hospital, and town centre.
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- Adverse impacts on bats as located in pinch point.
- Developing the site will lead to light pollution, adversely affecting wildlife.
- Object as within Green Wedge and will join Seaton with Colyford.
- Unaware of good opportunities for employment in this area.
- Object due to increase in traffic on to either Harepath Road or the A3052.

LP_Seat_04 - Land off Harepath Road at end of Fosseyway Park, Seaton - Planning Permission Granted

- Seaton Town Council agree this site should be used for the seven industrial units granted planning permission in May 2014.

LP_Seat_05 - Land off Harepath Road, Seaton - Preferred Allocation

- Seaton Town Council consider this site and Seat_03 together and do not object to allocating both sites, providing they are developed together and provide more than just housing.
- Seaton Town Council state a footpath should be required from Colyford Road to Gravel Lane where a crossing should be installed.
- Historic England state it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it is likely to be able to accord with national policy, guidance and legislation.
- Developer (Baker Estates) support this allocation but should be amended to about 130 dwellings reflecting the submitted planning application.

LP_Seat_06 - Former depot, Colyford Road, Seaton - Planning Permission Granted

- Although the site is an accessible location, there is a need for employment land so the site should be retained for employment.
- There is no surface water flood risk on site but Colyford Road is affected to the west, so development should ensure this issue is not worsened.

LP_Seat_07 (now known as Seat_15) - Land at Colyford Road, Seaton - Rejected Site

- Support for the rejection of this site due to flooding and ecological impact is noted and agreed.

LP_Seat_08 - Land between Churston Rise and Couchill Copse, Seaton - Rejected Site

- Support for rejecting this site due to adverse landscape and ecological impact is noted and agreed.
- The use of the site for informal recreation is noted in the site assessment, despite signs on site stating, “private land – no public rights of way”.
- Drainage and land stability would need to be assessed in detail through a planning application.
- The loss of the site as a firebreak is not considered to be relevant in assessing this site, given the lack of evidence that this is an issue in the area.

LP_Seat_09 - Land at Clay Common (Little Paddock), Seaton - Preferred Allocation

- Planning Inspector dismissed this site in 2015 on grounds of high landscape value and ecological impact on bat pinch points.
- There must be footpath access from the development to the Wetlands, then south on the proposed cycle route into Seaton before construction starts.
- Object as within Green Wedge, contrary to current Local Plan.
- Object due to adverse impact on the village character of Colyford, upheld by a Planning Inspector on appeal.
- Mercia mudstone impedes drainage and infiltration from SUDS.
- Local people have been objecting to this site for years, and the issues remain: vulnerable to flooding, ribbon development, too far from the town.
- Building on this site will cause irreversible damage to Seaton Wetlands to wildlife, including cat predation, and as a recreation space for people.
- Road along eastern boundary is very narrow, winding and has no footpath so there should not be any access to this site.
- Object as would mean loss of land for food production, classed as best and most versatile agricultural land.
- Run-off from this site is likely to be into the Stafford Brook which feeds into the River Axe, increasing phosphate levels contrary to Natural England advice.
- Developing the site will lead to light pollution, adversely affecting wildlife.

- The yield of seven dwellings reflects the submission by the landowner/developer in the HELAA – this represents a density of 25 dph. The prevailing character of the area is for large, detached dwellings on large plots, with adjacent single dwellings having a plot size of 0.17 ha, compared to a Seat_09 site size of 0.29 ha. Therefore, even the minimum threshold of five dwellings would be contrary to the character and appearance of the surrounding area.
- DCC state there are no access difficulties for the site. The site is around 1km from the town centre, which is considered within reasonable walking distance, along an existing footpath.
- The site is within Beer Quarry and Caves SAC consultation zone, sustenance zones, landscape connectivity zone, but overall, a minor adverse ecological effect predicted (not significant).
- The site is Grade 3 agricultural land, and other agricultural land in the area remains available.

LP_Seat_10 - Land south of Beer Road, Seaton - Rejected Site

- Support for rejecting this site is noted and agreed, with adverse landscape impact being the principal reason.

LP_Seat_11 - Land at Barnards Hill Lane, Seaton - Rejected Site

- Support for rejecting this site is noted and agreed.

LP_Seat_14 - Seaton Town Hall Long Stay Car Park - Rejected Site

- Support for rejecting this site is noted and agreed.
- Omission sites
- Seat_16 has no evidence of being available for development.
- Seat_17 has no evidence of being available for development.

- Adverse impacts on bats as located in pinch point.
 - Unaware of good opportunities for employment in this area.
 - National Cycle Route so avoid increased traffic along Colyford Road.
- LP_Seat_06 - Former depot, Colyford Road, Seaton - Planning Permission Granted**
- Seaton Town Council state that as no work has begun on the business units approved in July 2014, perhaps housing should be located here given its accessible location, and the business units moved to Seat_03.
 - Concern that sewers and surface water drains could not cope with this development.
- LP_Seat_07 (now known as Seat_15) - Land at Colyford Road, Seaton - Rejected Site**
- Seaton Town Council agree this site should be rejected as there is insufficient evidence that flooding and ecological issues can be mitigated.
 - Support rejecting this site as it is too close to Seaton Wetlands.
 - The owner of this site is trying to put a holiday park on this site – it should remain as agricultural land.
- LP_Seat_08 - Land between Churston Rise and Couchill Copse, Seaton - Rejected Site**
- Seaton Town Council agree this site should not be allocated due to adverse landscape impact and impact upon bats.
 - Support the rejection of this site as it is highly exposed and sensitively located on the skyline, with views from the AONB and the seafront.

- Support rejecting this site as it is a well-known wildlife site, home to adders, mice, foxes, badgers, bats and birds.
- This site is well used for informal recreation, used for nearly 60 years, so should not be developed.
- Development on this site would place further strain on the drainage system, repaired numerous times in recent years due to collapsed pipework.
- This site should not be developed as it will mean a loss of a firebreak between existing built development and forest beyond.
- Developing this site could cause instability for existing houses to the east due to the steep slope, so support its rejection.

LP_Seat_09 - Land at Clay Common (Little Paddock), Seaton - Preferred Allocation

- Seaton Town Council do not object to this site for a small amount of housing not exceeding seven homes.
- Cramming seven houses onto this land would destroy the character of the immediate locality which is larger detached homes.
- Object as located too far out of town.
- Object as would result in loss of the only agricultural land in Seaton.
- Object as this site is home to wildlife, including bats.
- Access on to Beer Road is dangerous, particularly turning right.
- Development of this site will lead to further development of the large adjacent field.

<p>LP_Seat_10 - Land south of Beer Road, Seaton - Rejected Site</p> <ul style="list-style-type: none"> • Seaton Town Council agree this site should be rejected due to adverse landscape impact. • Support the rejection of this site due to being on a steep slope in a sensitive location meaning adverse landscape impact. • Support rejecting this site as it is within the corridor used by bats from the Beer Quarry Caves. <p>LP_Seat_11 - Land at Barnards Hill Lane, Seaton - Rejected Site</p> <ul style="list-style-type: none"> • Seaton Town Council agree with the rejecting this site as it is not within, adjacent, or otherwise well related to Seaton. <p>LP_Seat_14 - Seaton Town Hall Long Stay Car Park - Rejected Site</p> <ul style="list-style-type: none"> • Seaton Town Council agree with the rejecting this site as it is too small to allocate. <p>Omission sites</p> <ul style="list-style-type: none"> • A local resident states Bradford and Harcombe Engineering land on Harbour Road would be suitable if they became available (Seat_16). • A local resident suggests a further site at Marshlands, Harbour Road which Seaton Town Council has considered redeveloping (Seat_17). 	
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>Seat_13a - Land adjacent to Axe View Road, Seaton - Preferred Allocation</p>	<p>Officer commentary in response:</p>

The responses to the option to allocate site Seat_13a express significant opposition. Many respondents cite concerns about the site's proximity to sensitive environmental and heritage assets, such as the Beer Quarry Caves SAC and a scheduled Roman villa. There are also major worries about the risk of increased flooding, both on the site itself and in the surrounding residential areas.

Commenters highlight the site's location within a designated Green Wedge and the importance of preserving these valuable green spaces, both for environmental and community benefits. The inability of Seaton's existing infrastructure, including roads, schools, and healthcare facilities, to support additional development is another frequently raised issue.

Some respondents suggest that there are more suitable sites available for new housing that would have less impact. A few acknowledge the need for new homes but argue that this particular site is inappropriate due to the various constraints and concerns outlined.

Key points raised, in order of frequency:

1. Environmental and heritage concerns
 - Proximity to Beer Quarry Caves SAC and scheduled Roman villa
 - Potential impact on biodiversity and landscape connectivity
2. Flooding and drainage issues

- The key points raised have all been considered in the Seaton Site Selection report, which concludes that the site should be allocated.
- The Landscape Sensitivity Assessment has been updated to note the site is visible from E Devon Heritage Coast, 1.8km to south east.
- The impact upon the Scheduled Monument has been considered through a Historic Environment Site Assessment, which has been updated to reflect consultation responses.

<ul style="list-style-type: none">○ Existing flooding problems in nearby residential areas○ Concerns about exacerbating flood risk through development3. Opposition to development within the Green Wedge<ul style="list-style-type: none">○ Importance of preserving the Green Wedge between Seaton and Colyford4. Infrastructure and capacity concerns<ul style="list-style-type: none">○ Inadequate roads, schools, healthcare, and other services to support new housing5. Preference for alternative sites or reduced housing allocations<ul style="list-style-type: none">○ Suggestion to focus development on more suitable sites○ Argument to reduce overall housing targets6. Specific concerns about site layout and access<ul style="list-style-type: none">○ Impact of new access road through existing residential area○ Potential loss of landscape features like Devon banks and trees7. General opposition to the allocation<ul style="list-style-type: none">○ Respondents simply state their objection without providing detailed reasons8. Potential benefits of development<ul style="list-style-type: none">○ Acknowledgement of need for new homes, but concerns about this site9. Criticism of the consultation process	
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- Perception of lack of consideration for smaller development sites

Statutory organisations summary

Natural England

Site is close to the E Devon AONB and E Devon Heritage Coast.

Historic England

The site is adjacent to a Scheduled Monument – should consider the impact of development on archaeology and its setting and retention of a green open buffer rather than encircling the site in development.

At this stage, in the absence of further information in a HESA, this site is unlikely to be suitable for allocation. The HESA should be informed by archaeological advice from the County Archaeologist.

Devon County Council

The note the site would be accessed from the housing estate roads, of which there are a few options, but there are fewer sustainable travel options for Seaton.

This site lies in an area of known high archaeological potential (adjacent to a late Iron Age farmstead and Roman villa) so should not be allocated until comments have been received from Historic England and geophysical survey and field evaluation have been undertaken.

The site has a sloping topography that could create inert material that should be considered in the layout, design and levels of any development.

Seaton Primary School can facilitate the proposed level of development, but contributions toward secondary education would be required.

<p>NHS Integrated Care Board The GP practice has sufficient capacity to accommodate the 64 dwellings proposed.</p> <p>South West Water Waste Water Treatment Infrastructure- Not expected to require significant upgrades to the network or treatment process. Waste Water network / Sewer Infrastructure - Not expected to require significant upgrades to the network or treatment process. Water Infrastructure - Likely to need upgrades to the water distribution network.</p>	
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Sidmouth and its future development

Draft Plan consultation

<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Recognition that the NPPF is (was) prescriptive on how local housing needs are to be established and that local plans must allocate sufficient land to meet those needs. However, it is important to note that the Standard Method for assessing local housing need is based on ONS projections of households and includes trend migration. So “local need” is in fact not local need as most residents would accept the term (ie the excess of newly forming households in the neighbourhood plus local suppressed demand); in fact East Devon's natural population growth is negative. The projections were based on a period when 	<p>Officer commentary in response:</p> <p>General Issues</p> <ul style="list-style-type: none"> • Issues relating to a lack of infrastructure will be considered in the forthcoming Infrastructure Delivery Plan, which will highlight how they should be addressed in delivering development proposed in the Local Plan. • Aspirations for more affordable housing are noted and requirements are included within Local Plan policy, subject to viability. • Local Plan policies support development of brownfield sites. • The Green Wedge to prevent the coalescence of Sidford and Sidbury will be retained, albeit covering a slightly reduced area.
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East Devon was subject to large in-migration from Exeter to Cranbrook, and there is a danger that this trend becomes self-perpetuating by being built into successive plan targets.

- The Environment Agency note that a coastal change management area including a significant number of residential properties is proposed to be designated and recommend the policy (in conjunction with Policy 37) considers allocating land precisely for the purpose of relocating the properties east of Sidmouth within the CCMA.
- Devon County Council (DCC) state the secondary school would require expansion to support the proposals.
- DCC support small levels of development – rejected sites are outside standard cycling distances to town centre so would require a good bus service, which would still be preferable to a new community.
- DCC state there are a number of surface water flowpaths, ordinary watercourses and flood zone areas impacting upon sites to the north of Sidmouth/Sidford - opportunities to enhance existing watercourses and daylight any culverted sections should be sought.
- Sidmouth TC - The additional burden on local services and the erosion of the AONB on which our tourism industry depends are the principal reasons why Sidmouth Town Council do not support the allocation of housing on Sidm_01, Sidm_06, Sidm_17 and Sidm_34. Sidm_06 and Sidm_34 also contravene the Sid Valley Neighbourhood

LP_Sidm_01 - Land south-west of Woolbrook Road, Sidmouth - Preferred Allocation

- The site abuts a flood zone but no FZ is present within the proposed allocated site itself. Opportunities to lower the flood risk to the adjoining area are noted, as is the need for on-site flooding mitigation (such as SUDS).
- The area of woodland in the north of the site is not proposed for allocation.
- There has been a change of Government since the suggested change in housing targets being 'advisory' rather than mandatory; the new version of the NPPF recently out for consultation would result in even higher housing targets.

LP_Sidm_02 - Land at Sidford High Street - Rejected Site

- This site has been rejected due to the significant impact allocation would have on the National Landscape.

LP_Sidm_03 - The Knowle, Sidmouth - Planning Permission Granted

- This site already has planning permission granted so, therefore, is not proposed for allocation.

LP_Sidm_04 - Land to the east of The Lookout, Coreway, Sidford - Rejected Site

- This site has been rejected due to the significant impact allocation would have on the National Landscape.

<p>Plan by promoting the coalescence of Sidford and Sidbury and the latter site also has highway difficulties.</p> <ul style="list-style-type: none"> • General comments resisting the development of green field and suggesting more emphasis is placed on brown field sites to help protect the planet and meet climate commitments. • Comments suggesting that Sidmouth should have more residential allocations due to the presence of vibrant town centre / to balance with allocations at Exmouth and tier 2 settlements. • SCOC - A far greater emphasis needs to be placed upon the provision of basic infrastructure: roads, health provision, schools, sporting and recreational facilities, utilities, public transport and community services. These are the essential requirements of modern life, not luxuries, yet they are barely mentioned. It is unacceptable to even contemplate the kind of population growth being proposed without addressing these concerns. • Sid Vale Association - <ul style="list-style-type: none"> ○ Development should just be to suit the local needs of Sidmouth and the Sid Valley as opposed to a more extensive 'wider surrounding area'. ○ Accordingly we strongly disagree with para. 6.54 of the Draft Local Plan that Sidmouth is a suitable place for a 'large amount of development' .. albeit subject to the constraints of the AONB. Rather we would prefer redevelopment of brownfield sites/ repurposing older larger houses into flats and conversion of older commercial properties and office 	<p>LP_Sidm_05 - Land east of Burscombe Lane, Sidmouth - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • This site has been rejected due to the significant impact allocation would have on the National Landscape. <p>LP_Sidm_06a - Land west of Two Bridges Road, Sidford - <i>Preferred Allocation</i></p> <ul style="list-style-type: none"> • Sidm_06a is only a small proportion of the originally proposed Sidm_06 taken as a whole; allocation would only bring development alongside the A375 to Sidbury in line to the employment site. • The Green Wedge between Sidford and Sidbury would only be slightly reduced in size. • The impact on the National Landscape, taking just Sidm_06a into account, would be minimal in comparison to the site as a whole. <p>LP_Sidm_06b - Land west of Two Bridges Road, Sidford - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Although development at Sidm_06a has been deemed acceptable in terms of the impact on the National Landscape and Green Wedge, any wider allocation (i.e. at Sidm_06b) has not. <p>LP_Sidm_08 (a/k/a Sidm_27) - Land east of Two Bridges Road, Sidford - <i>Planning Permission Granted</i></p> <ul style="list-style-type: none"> • This site already has planning permission granted so, therefore, is not proposed for allocation. <p>LP_Sidm_09 - Land east of Two Bridges Road, Sidford - <i>Rejected Site</i></p>
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<p>buildings within the Sid Valley as a more sustainable methods of increasing the housing supply.</p> <ul style="list-style-type: none"> • Sid Valley Biodiversity Group - <ul style="list-style-type: none"> ○ The SVNP is possibly one of the few Neighbourhood Plans which promotes the creation of a Biodiversity Action Plan – which has already been carried out in collaboration with Sidmouth Town Council – and yet there is no mention in the “Key messages from the Neighbourhood Plan for the area” of the Sid Valley. The SVBG would therefore request that the draft Local Plan includes reference to the Biodiversity Action Plan as promoted by the SVNP. ○ Also disappointing is that, under the “Key messages from the Neighbourhood Plan for the area” of the Sid Valley, there is no mention of any the SVNP's 'green' policies, despite the general 'green' approach in the draft Local Plan. On the other hand, there are several mentions of 'green corridor' in relation to other settlements, including Exmouth, Uplyme and Westclyst – and yet not for the Sid Valley, where the SVNP contains a specific Policy (number 4) as well as references to specific green corridors, including the Byes park along the blue corridor of the River Sid. The SVBG would therefore request that the draft Local Plan includes reference to the 'green corridors' of the Sid Valley, as referenced in the SVNP. 	<ul style="list-style-type: none"> • The loss of agricultural land, increase in traffic and run-off should this site have been proposed for allocation is noted. <p>LP_Sidm_12 – The Hams, Fortescue Road, Sidford - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • It is noted that this site is within The Byes and is not proposed for allocation. <p>LP_Sidm_13 - Land adjoining Fortescue Road, Sidmouth - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • This site is very sensitive in landscape terms, falling in the East Devon National Landscape on rising land that is visually prominent from a wide range of public viewpoints. Allocation for development is not recommended. <p>LP_Sidm_14 - Land adjacent to Stevens Close, Sidford - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • It is noted that this site is within the National Landscape and any development would be highly visible as it is on rising ground. <p>LP_Sidm_16 - Sidmouth Garden Centre, Stowford - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • It is noted that comments expressed in the consultation agree that this site should not be allocated. <p>LP_Sidm_17 - Peak Coach House (Numbers 1-3 Belfry Cottages), Cotmaton Road, Sidmouth – <i>Originally a Preferred Allocation, now a Rejected Site</i></p> <ul style="list-style-type: none"> • The reasons for not allocating this site are noted, especially the small number of dwellings this site would contribute to targets (some
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- **Greenway Lane residents -**

- We strongly believe that the small area of woodland to the extreme north of site Sidm_01, which borders Woolbrook Road and Greenway Lane, should be excluded from this allocation for development on the grounds of its positive contribution to the landscape character of the surrounding area, including the East Devon A.O.N.B, and because of its ecological value as a habitat for local wildlife.
- We strongly believe that the proposed new line of the 'Settlement Boundary' for Sidmouth should follow the line of Greenway Lane (indicated in red on the Local Plan Map extract), and exclude the small cluster of dwellings to the north of Greenway Lane.
- Due to the size of this potential development, and its strategic position at the gateway to Sidmouth, we strongly believe that the Council should take the lead in setting an agenda of 'design excellence' for this site. The aspiration should be for an award winning development that contributes positively to the character of the town and is not just an opportunity to meet the housing
- As we are stuck with the partially developed site at Sidford, why can't the council compulsorily purchase it at a fair price and change its use to affordable housing and houses suitable for elderly people? Which is what you say we need.

existing dwellings may even need to be demolished to allow for further development) and that parts of Peak Hill Road to the south may be vulnerable to coastal erosion. This site is not proposed for allocation.

LP_Sidm_18 - Land north of Sidmouth Garden Centre, Stowford - *Rejected Site*

- This site is not proposed for allocation and there were no comments contrary to this view.

LP_Sidm_19 - Land at Dark Lane, Sidmouth - *Rejected Site*

- The reduction in the number of dwellings for which this site has been proposed is noted but does not impact on the reasons for why Sidm_19 should be rejected for development.

LP_Sidm_20 - Station Yard, Station Road, Sidmouth - *Rejected Site*

- This site is not proposed for allocation and there were no comments contrary to this view.

LP_Sidm_22 - Alexandria Industrial Estate, Alexandria Road, Sidmouth - *Rejected Site*

- This proposal was rejected as a loss of active employment site is a significant constraint on development. Comments expressed support for this view.

- Suggestions that low levels of proposed development in Sidmouth is politically motivated and/or due to the number of councillors and authority officers that live in Sidmouth.
- Suggestion that Sidmouth should have more services and jobs to support the scale of the town.
- Sidmouth should be recognised as having extremely limited development potential because of its location in the AONB.
- Housing mix should address the local population imbalance, with Sidmouth suggested as currently attracting high numbers of wealthy retirees with a population in balance and a high proportion of second homes.
- Request to revisit allocations and policy approach in light of government housing targets no longer being mandatory, but rather left to local decision makers.
- There is little reference or cross-linkage to other policies, including the climate emergency and biodiversity.
- The policy addresses possible need for additional development for 168 new homes and 3.11 Ha (7.68 acres) of employment. The evidence base for housing is provided but with no correspondingly detailed analysis of future employment trends and location of work.
- The VGS urge the District Council to clarify exactly as to how the new housing allocations will contribute to providing housing for the low paid who actually work in the Sid Valley. The VGS suggests that the plan fails to identify the high proportion of in commuting to serve the economic activity of the town.
- Need to protect the coastline from development.

LP_Sidm_24 - Land east of Two Bridges Road and north of Sidm_08, Sidford (the central portion of Sidm_09) - *Proposed Employment Allocation*

- It is noted that development of this site would lead to the loss of agricultural land within the National Landscape and impact on the size of the Green Wedge between Sidford and Sidbury.
- The question of actual need for further employment land in and around Sidmouth is also noted.

LP_Sidm_28 - Church Street Car Park, Sidford - *Rejected Site*

- This site is not proposed for allocation and there were no comments contrary to this view.

LP_Sidm_30 - Land at Redwood Road, Sidmouth - *Rejected Site*

- It is noted that this site is within both the National Landscape and Coastal Preservation Area, and any development would be highly visible as it is on rising ground.

LP_Sidm_31 - Land north of Cornfields, Sidford - *Originally a Rejected Site, now a Preferred Allocation*

- The reasons for initially disregarding this site are noted; the National Landscape boundary has been tightly drawn around Sidford and the site is well related to the existing settlement with housing to the south and east and development of this site would clearly be seen in this context. Other matters such as access, drainage and ecology

- Turley for Bloor Homes – Supportive of Sidmouth as a tier 2 settlement. Suggest that a lack of suitable development opportunities calls for more land for development to be released (within the AONB). Challenge the logic for excluding sites LP_Sidm_02 and LP_Sidm_35 from the proposed allocations within the LP. Turley provide a Vision Document and call for a rethink on these sites.
- Policies on coastal erosion imply that little control would be placed on new developments. The policy needs to be developed so this is not seen as a route to easy planning consent in rural settlements within Sidmouth - much of which is in the AONB.
- Concern raised over pressure on housing market from second homes and holiday lets.
- Need evidence to show there is a demand for 2.4 hectares of employment land in Sidmouth and Sidbury, otherwise it could be used for residential by default – the Sid Vale Association do not consider there is demand for more employment land.
- Support Sidmouth settlement boundary proposed
- The East Devon AONB team state that 2 of the three sites for development are within the AONB but fall within the proposed new settlement boundary. Any of these designations should be accompanied by an assessment, either as an LVIA or landscape appraisal to ensure that they do not impact on these important natural heritage sites.
- National Highways anticipate the strategic road network can accommodate the level of growth proposed at other

matters are acceptable and should not be a bar to the allocation of the site. This site is now proposed for allocation.

LP_Sidm_35 - Land north of Sidford High Street - *Rejected Site*

- Comments agree that development of this site would have an unacceptable landscape impact.

Main Centres, Local Centres and Service Villages, but expect a high-level transport assessment for the entire Local Plan to provide evidence.

- Plan reference to 'The Lookout' is incorrect, orientation of the field is west of the lookout, not east. This field lies within the AONB and is visually significant and tranquil as well as housing rare wildlife species.

Nb. Devon County Council's consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.

LP_Sidm_01 - Land south-west of Woolbrook Road, Sidmouth - Preferred Allocation

- DCC note there have been longstanding issues with ordinary watercourse and surface water flooding in the Woolbrook catchment, primarily of the highway – the site is an opportunity to lower flood risk to the catchment.
- The distance to any facilities and infrastructure of the proposed Sidm_01 allocation throws into doubt the viability of the 15/20-Minute Neighbourhood.
- Sidmouth Town Council does not support the allocation of employment land within the AONB at Sidm_01.
- Sidmouth Town Council would like to see land at Sidm_01 allocated in the Local Plan for a Park and Change facility.
- Sidmouth Cycling Campaign state the potential site for allocation south west of Woolbrook Road (Sidm_01) lies adjacent to the former railway line that has been identified

as a future cycle route from Sidmouth to Feniton (included in Policy 66). We recommend that the boundary of this site be extended to include the former railway line. This will enable a condition to be put on any future planning permission for the former railway line to be adopted as Public Open Space and create a footway/cycleway to the south to link up with the existing public footpath to Ice House Lane. This would support Strategic Policy 65 and Policy 66.

- Woolbrook Road site (Sidm_01) housing numbers suggested as too high.
- Sid Vale Association -
 - There is no justification for 0.51 Hectares of Employment Land – as access is poor, there is no demand for more Employment Land and its incompatible to have Employment Land (i.e. B2 industrial uses) next to a new residential area).
 - Residential development should only be allowed if it provides Affordable Housing (rented/ shared ownership etc.) and housing is reserved for a proportion of ‘Key Workers’).
 - Additionally, this proposal is contrary to this Draft Local Plan’s Policy 75 as the site is within the AONB and it will not enhance the AONB. Rather this proposal will be detrimental to the AONB.
 - With the anticipated change in Government’s NPPF policy to just providing ‘Advisory’ – not mandatory housing targets this site should be removed from the Local Plan as a proposed housing site.

- SVBG - If the development were to progress, the SVBG would like to highlight that part of the site is within the flood zone and that any development should be significantly above the current and any likely future flood zones, taking into account the impact of climate change. The SVBG would welcome the retention and expansion of the hedgerow to create a wider wooded buffer along the boundary with the road, which would help to reduce flood risk whilst also providing a wildlife corridor. [See the suggested riparian woodland footprint from EA's "working with natural processes" map.]
- The SVBG would urge that any development on the site includes natural systems for flooding mitigation, including measures such as rain gardens and a robust SUDS scheme.
- Call for priority habitat to be retained and extended to the south and west. It is worth noting that this tiny woodland may be the last remnant of a larger ancient woodland, now lost, as evidenced by field names in the 1830 tithe map.
- The SVBG would urge that the boundary with the old railway line is protected and extended since it is currently a rich wildlife corridor, partly due to the many mature, dead and dying trees, including ash; these will be important for bats and invertebrates and should be retained wherever possible. The line should not be opened up for recreation, since this would inevitably lead to the removal of this important stock of veteran trees and standing dead wood. If recreational routes are needed, then agreeing access to

the fields above the railway line (to the north west) would be a better choice.

- This site lies adjacent to the former railway line that has been identified as a future cycle route from Sidmouth to Feniton (included in Policy 66). We recommend that the boundary of this site be extended to include the former railway line. This will enable a condition to be put on any future planning permission for the former railway line to be adopted as Public Open Space and create a footway/cycleway to the south to link up with the existing public footpath to Ice House Lane. This would support Strategic Policy 65 and Policy 66.
- Heritage is flagged as an important aspect of this site with archaeological finds in the past.
- Persimmon Homes –
 - The Company fully supports the inclusion of this proposed allocation within the Regulation 18 version of the Local Plan: it provides a logical rounding off to the settlement edge, is deliverable and provides an opportunity to meet the housing needs of Sidmouth and East Devon.
 - In our view, the Site would not provide a logical location for employment as there are sustainable and logical existing alternatives within the settlement. Furthermore, paragraph 6.53 of the Local Plan acknowledges the proposed strategy, in the context of the made Sid Valley Neighbourhood Plan, the clear emphasis on retaining existing employment sites and supporting the town centre.

Arguably, this is contrary to Sidm_01, as worded. A blanket employment policy should not be utilised, and further consideration should be made on a localised basis, to meet settlement needs.

LP_Sidm_02 - Land at Sidford High Street - *Rejected Site*

- Development with AONB should not be considered.

LP_Sidm_03 - The Knowle, Sidmouth - *Planning Permission Granted*

- Very sad. Despite the strength of local opposition towards development of this site, including a March by thousands of local residents, from the seafront up to the council offices, the planners simply ignored local opinion and went ahead.
- This was an opportunity to provide more mixed use/ mixed community housing in the heart of Sidmouth not more retirement properties which we have a surfeit of already and which I believe the developers are struggling to sell as it is.
- We need more affordable housing in Sidmouth. Not all can afford the available properties.

LP_Sidm_04 - Land to the east of The Lookout, Coreway, Sidford - *Rejected Site*

- Development with AONB should not be considered.

LP_Sidm_05 - Land east of Burscombe Lane, Sidmouth - *Rejected Site*

- Please protect all areas outside settlement boundaries that are AONB SSSI etc.
- Not suitable for development.

LP_Sidm_06a - Land west of Two Bridges Road, Sidford - Preferred Allocation

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to the setting of Sidbury Castle and LB's
- SVA –
 - We strongly object to the development of this site as it constitutes infilling of the 'Green Wedge' between and separating Sidford and Sidbury. We do not support this policy as it is outside the 'settlement boundary' of Sidmouth/ Sidford and the Council's own policy discourages such development (ie Draft Local Plan Policy No 7 dictates that there should be no development outside the 'Settlement Boundary').
 - The Local Plan itself notes that this site could cause 'settlement coalescence' & encroach into the Green Wedge between Sidford and Sidbury again contrary to the Council's own policies (refer Draft Local Plan Policy 78 – see below and Policy 3 of the adopted 'Neighbourhood Plan for the Sid Valley 2018 - 2032 seeking to avoid 'Settlement Coalescence').
 - - Additionally, this proposal is contrary to this Draft Local Plan's Policy 75 as the site is within the AONB

and it will not enhance the AONB. Rather this proposal will be detrimental to the AONB.

- Agent for Land Value Alliance - We support the identification of the Land West of Two Bridges Road (SIDM_06A) as a preferred site for approximately 30 homes.
- The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is protected within the Sid Valley Neighbourhood Plan. The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas. This site cannot be considered in isolation to the existing permitted development at site Sidm_09 and the cumulative negative impact that this additional site would have upon the local community, the road network and the local vista.
- This site clearly contravenes the policy in the Neighbourhood Plan for a green wedge between Sidford and Sidbury. It is in the AONB and any development of the site is inappropriate.
- Further development in this area following that recently granted permission at national level must take into account the impact on a road that is only a status because it connects the towns of Sidmouth and Honiton. It does not have the capacity nor structure to handle increased traffic flow and heavier vehicles which would be a consequence of such development.

**LP_Sidm_06b - Land west of Two Bridges Road, Sidford -
*Rejected Site***

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to the setting of Sidbury Castle and LB's
- Agent for Land Value Alliance – We consider that there is potential for a higher number of homes to be accommodated at Sidford [taking LP_Sidm_06a into account] and therefore that the Draft Plan should explore the potential for SIDM_06A to accommodate a quantum of development higher than 30 dwellings 'and that SIDM_06B could logically accommodate some of this increase.
- The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is protected within the Sid Valley Neighbourhood Plan. The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas.
- This location would not be appropriate for permitted development that a site of this size could deliver. This site cannot be considered in isolation to the existing permitted development at site Sidm_09 and the cumulative negative

impact that this additional site would have upon the local community, the road network and the local vista.

LP_Sidm_08 (a/k/a Sidm_27) - Land east of Two Bridges Road, Sidford - *Planning Permission Granted*

- This site is where the business park has already been granted planning permission. Since the draft Local Plan was published the site's owners have put the site up for sale and in doing so, they have raised the possibility of this site obtaining change of use from employment land to either residential or a mixed use of employment and residential.
- I have never been convinced that this site was suitable for use as employment land but that argument was lost in 2019 when a Planning Inspector determined it was suitable. As this is no longer agricultural land is a brown field site, I am in principle supportive of its future use being subject to change of use to either residential or a mixed use of employment and residential. I hope that whoever owns this land going forward will approach the District Council for such a change of use.
- On behalf of OG Holdings Retirement Benefit Scheme -
 - In assessing the Sidford Site as part of the HELAA assessment, the LPA's Policy Team are asked to take account of the extant permission and the technical data available to them, including the Environmental Impact Assessment, which is already available to the LPA as part of the extant consent. This information confirms that the development area

of the site can be delivered to achieve Flood Zone 1 and would in this respect be 'achievable' for housing.

- If it is that the LPA cannot accept a degree of housing on the Sidford site (Sidm_27), then the proposed investment in the Alexandria Industrial Estate would be unachievable. In order to deliver employment investment at Sidford, without a capital receipt from Alexandria Industrial Estate (which was previously envisaged), the Sidford site may need to be intensified for employment.
- The Policy Team are requested to review this representation and application 22/2063/MOUT, which details why the rewording of the policy associated with the two allocations is desirable if employment need is to be facilitated by viable levels of investment. Equally a shift in the nature of the allocations can relieve/improve the capacity to find suitable, available and achievable land for approximately 50 houses.
- The land is within the AONB and should be safeguarded from development.

LP_Sidm_09 - Land east of Two Bridges Road incorporating Sidm_08, Sidford - Rejected Site

- The Town Council does not support the allocation of employment land within the AONB at Sidm_09.
- Not supported - The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is

protected within the Sid Valley Neighbourhood Plan. The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas.

- Development here would increase traffic through the narrow A375 into the cross roads at Sidford. This already has problems with long tailbacks.
- Run-off would increase the River Sid water levels and increase flooding for Sidford and Sidmouth properties.
- Further development in this area following that recently granted permission at national level must take into account the impact on a road that is only a status because it connects the towns of Sidmouth and Honiton. It does not have the capacity nor structure to handle increased traffic flow and heavier vehicles which would be a consequence of such development.

LP_Sidm_12 – The Hams, Fortescue Road, Sidford - *Rejected Site*

- Not supported - This agricultural site of just under 5 hectares has been submitted for the residential development of around 50 homes. This site slopes from Fortescue Road towards the River Sid in the vicinity of the Byes which I believe is a restricted development area and the AONB forms part of this site's boundary. Part of the site at least is within Flood Zone 3. The site is located at the edge of Sidmouth and would encroach upon the boundary of Sidford.

**LP_Sidm_13 - Land adjoining Fortescue Road, Sidmouth -
Rejected Site**

- Not supported - This agricultural site has been submitted for the development of just over 30 houses. The site is located at the edge of Sidmouth and would encroach upon the boundary of Sidford.
- Landowner - I would respectfully point out that the full extent of the submission should have been properly displayed so that the public are made aware of the additional areas of land, totalling 25 acres, which will be handed over to community use. This area includes 15 acres either side of the River Sid. The proposal also includes the provision of new cycleways and footpaths to create a circular walk beside the river, connecting with Footpath No.157, and via a new bridge linking to the footpath and cycleway in The Byes. The proposal also includes a new allotment, and a programme of large scale tree planting and habitat creation. The scheme also includes a new lake to encourage migratory birds and wildlife generally.

**LP_Sidm_14 - Land adjacent to Stevens Close, Sidford -
Rejected Site**

- Not supported - This site is within the AONB and any development on this site would be highly visible.

**LP_Sidm_16 - Sidmouth Garden Centre, Stowford - Rejected
Site**

- Support for rejection.

LP_Sidm_17 - Peak Coach House (Numbers 1-3 Belfry Cottages), Cotmaton Road, Sidmouth - *Originally a Preferred Allocation, now a Rejected Site*

- The Environment Agency note that while the site is outside the proposed coastal change management area, parts of Peak Hill Road to the south may be vulnerable to coastal erosion. The plan should consider whether the alternative access of Cotmaton Road is appropriate to serve the level of development proposed.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- This site should not be included in the Local Plan allocation because road access is too narrow. Residents have already complained about the difficulty passing other vehicles at this (southern) end of Cotmaton Road. The turn out onto Peak Hill Road is very dangerous because its not possible to see vehicles entering from Peak Hill. I would have expected DCC Highways to object to the inclusion of this site as complaints have already been made to Cllr Hughes.
- The number of additional houses from this site is insignificant, given that existing dwellings would be demolished. The properties are certain to be at the upper

end of the market in Sidmouth because of the location and of no real benefit to most residents of East Devon.

- This site is in the East Devon AONB and visible from lower down the valley and from Connaught Gardens. The area is characterised by many trees and shrubs whose loss would be damaging for the environment and biodiversity. No further development should be permitted in this area of the town.
- SVA -
 - This proposal represents an overdevelopment of this existing sensitive site which currently only has 5 dwellings, has very limited vehicular access from Cotmaton Road and falls within the original curtilage of the adjacent 'Peak House', (Grade II Listed).
 - The existing Peak Coach House buildings include a very attractive clock tower with weather vane, old Walls etc. which should be retained.
 - This site is very prominently situated with commanding 'key' views down the Sid Valley looking east and equally is clearly visible from Sidmouth below and the hills above. Development of this site would cause a blot on the landscape clearly visible looking across the Valley. NB Retention of 'Key' views is Policy No 2 of the Sid Valley Neighbourhood Plan so development of this site would adversely affect views across the Sid Valley.
- In broad terms it is difficult to see how the plot of land can support 11 3-4 bedroom dwellings.

- Suggested as overdevelopment of the site.
- Concerns over highways capacity, impact of development with significant vehicle movements.
- Request for a covenant preventing holiday lets / second home ownership.

LP_Sidm_18 - Land north of Sidmouth Garden Centre, Stowford - *Rejected Site*

- No comments

LP_Sidm_19 - Land at Dark Lane, Sidmouth - *Rejected Site*

- Avalon for Mr and Mrs Mayor (Land owners) - Suggest that the site assessment work is incorrect in rejecting this site for allocation. In light of the identified development constraints, it is now proposed that the number of houses for the site could be limited to 11 houses (a 57.7% reduction). An indicative concept plan has been provided to show at a high level how the site could come forward to provide this reduced level of development and achieve the approach to development set out in this letter. The layout shows a mix of detached (5 units – coloured blue) and semi-detached (6 units – coloured orange) alongside retained and additional trees and hedge planting along the Dark Lane boundary and a widened access road along Ice House Lane.
- This piece of ground is high and any houses would be very much overlooking surrounding properties.
- Road access is single lane Devon bank, only suitable for very occasional traffic. Dark lane is a beautiful old Devon lane with banks and overhanging trees that would have to be completely removed or upgraded.

- A lot of wildlife use or live on the land, including fox, badger, rabbits, tawney owls and slow worms.

LP_Sidm_20 - Station Yard, Station Road, Sidmouth - Rejected Site

- No comments

LP_Sidm_22 - Alexandria Industrial Estate, Alexandria Road, Sidmouth - Rejected Site

- This is Land should only be for Industrial Usage as it is at the Moment. It should NOT be allowed to change to expensive residential usage.

LP_Sidm_24 - Land east of Two Bridges Road and north of Sidm_08, Sidford (the central portion of Sidm_09) - Proposed Employment Allocation

- Sid Vale Association - 1.6 Hectares - proposed as an Employment Site.

This proposal is strongly objected to as -

- I. It will infill the Green Wedge between Sidford and Sidbury (contrary to the Council's Policy 78 in the Draft Local Plan - see below and Policy 3 of the adopted 'Neighbourhood Plan for the Sid Valley 2018- 2032 seeking to avoid 'Settlement Coalescence').
- II. There is no need for more Employment Land as the Alexandria Industrial Estate, Sidmouth, is now subject to a planning application for new Business Units. Additionally the adjacent proposed 'Sidford Business Park' on the north east side of Sidford is 'For Sale' as the owners advise there is no 'demand for Employment Land'.
- III. Additionally, this proposal is contrary to this Draft Local Plan's Policy 75 as the site is within the AONB and it will

not enhance the AONB. Rather development of this site will be detrimental to the AONB.

- Call for the site (currently allocated for employment) to be unallocated and allowed to revert to agriculture.
- This site has previously been identified as a potential extension of the business park site next door; however, this site is not being pursued by the owners of the business park.
- The development of this site would lead to the loss of agricultural land in the AONB. It would leave to the creeping coalescence of Sidbury and Sidford which is protected within the Sid Valley Neighbourhood Plan.
- The use of this site for industrial purposes would add to the already congested roads through Sidbury and the School Street part of Sidford and this would impact negatively on these areas.

LP_Sidm_28 - Church Street Car Park, Sidford - *Rejected Site*

- No comments

LP_Sidm_30 - Land at Redwood Road, Sidmouth - *Rejected Site*

- I support recommendation to reject this site. It is a sloping site which acts as an ecological buffer to the woodland of Salcolme Hill, coastal protection zone and AONB. The field is a hunting ground for a variety of mammals including fallow deer, badgers, foxes and bats. Any development would have a highly detrimental impact on both the ecology of the slopes of Salcolme Hill and a high visual impact on sightlines across the valley as its elevation is

visible from many points in the valley and in particular from the west. The field and other adjacent fields should have protected designation to prevent any future attempts at development.

- Area of outstanding natural beauty and coastal preservation zones should be prohibited from developments.

LP_Sidm_31 - Land north of Cornfields, Sidford - *Originally a Rejected Site, now a Preferred Allocation*

- The conclusions to disregard this site on landscape grounds are somewhat surprising, given the proximity of the adjacent housing development which lies to the east and south of the site. The East Devon AONB boundary has been tightly drawn around Sidford, and as such most new housing development to support the housing requirements for Sidford and the wider hinterland of Sidmouth is going to extend into the AONB. There is not an in-principle objection or bar on development in AONBs and this reflected in the application approval for the sited referenced LP_Sidm_08, which lies to the west of the site (LP_Sidm_31) being supported under this representation. In allowing the appeal for the site referenced LP_Sidm_08, the Inspector only had to substantively deal with highway matters. The impact on the AONB, was confined to other matters and the development which was extensive was not considered to have an adverse impact on the AONB. The site was allocated and therefore the development was acceptable in terms of the impact on the AONB.

- When considering the extent of the impact of the LP_Sidm_31, as previously stated the site is well related to the existing settlement with housing to the south and east. The development of this site would clearly be seen in the context this development. Thus, the impact on the on the AONB is considered to be limited. Additionally, the northern boundary of the site has mature tree coverage which will screen the development and integrate the site into the landscape with little or no impact on the AONB. Furthermore, it will have been noted that the site slopes down from the north to the south, thus reducing any potential impact on the character of the AONB. Therefore, it is considered that the reasons for not allocating the site are essentially unfounded and the Council are requested to reconsider their position and to allocate the site.
- It is considered that other matters such as access, drainage and ecology matters are acceptable and should not be a bar to the allocation of the site.
- Please protect existing AONB and SSSI sites outside settlement boundaries

LP_Sidm_35 - Land north of Sidford High Street - *Rejected Site*

- Development within AONB should not be considered. It would be unacceptable on this site.

Omission sites at Sidmouth

- None identified.

Development at Local Centres – General issues

Draft Plan consultation

Key issues raised in consultation:

General issues (not relating to individual settlements)

- Too much development is identified for all five Local Centres, albeit Lympstone may be suitable to accommodate more given its train station.
- Agree with modest development to increase population and support local centres but think more development should be identified to support local amenities.
- The smaller Local Centres of Broadclyst, Lympstone, Woodbury have too much growth, a disproportionate amount, in addition to a new settlement in the area.
- The larger centres of Budleigh, Colyton and Woodbury should have more houses, jobs and services allocated to them.
- The East Devon AONB team state that Budleigh Salterton is fully within and Woodbury is very close to the East Devon AONB and proposals at these locations should be accompanied by an LVIA or landscape appraisal to consider the effects of the proposals on the AONB.
- National Highways anticipate the strategic road network can accommodate the level of growth proposed at other Main Centres, Local Centres and Service Villages, but expect a high-level transport assessment for the entire Local Plan to provide evidence.

Officer commentary in response:

- The scale of development at each Local Centre will be consistent with the Local Plan spatial strategy to support development that meets local needs and those in the immediate surrounds.
- Landscape Sensitivity Assessment has been undertaken for all site allocations, with further work to justify major sites that are within the AONB (now known as National Landscapes).
- A high-level transport assessment for the entire Local Plan is underway.
- Education contributions will need to be invested in the new community, where justified.
- Employment land at Sidmouth is considered in other sections of the Local Plan.

<ul style="list-style-type: none"> • Devon County Council comment that secondary and SEND contributions arising from development proposed near to the new community (e.g. Woodbury) will need to be invested in the new community. • Sid Vale Association - The policy has to be justified by showing that there will be a demand for 2.4 Hectares of Employment Land in Sidmouth, Sidford and Sidbury as otherwise there is the risk the land could be used for residential purposes by default. Our local market experience and knowledge is that there is no demand for more Employment Land in the Sid Valley. • The Avenues Residents Association advise - Supporting existing villages may lead to the destruction of such communities because of the need for an iterative process to allow them to flourish and grow. Lack of development may hinder their future. Such an approach leads to greater development in towns and thus a movement of village populations to towns where facilities are available. It is important to enhance village services to allow them to survive. Development of towns may cost villages in the future. 	
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<p>Development at Local Centres – Broadclyst</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p>	<p>Officer commentary in response:</p> <p>General Issues</p>

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| <ul style="list-style-type: none">• Devon County Council (DCC) are concerned about the ability to support the proposed level of development due to impact upon primary and secondary school provision in Broadclyst.• Fail to see the similarities between Broadclyst (one shop) and other settlements in this policy.• Broadclyst Parish Council -• One of the biggest concerns of residents is that increasing the size of the village by 15% will put intolerable pressure on already struggling local services. It is felt that development on this scale, far from enhancing the vitality of the local community, is likely to be detrimental. Without remedial action, a swell in population will be especially difficult for the local primary and secondary schools (all full), and the GP surgery (at capacity).• We would like EDDC to establish a protected Green Belt around any potential new development to prevent more urban creep. It is worrying for residents to see so much urban expansion around our village, and it is felt that if this is not done, it misses an opportunity to allow Broadclyst to retain its special and unique character, without which it is destined to become a suburb of either Cranbrook or Greater Exeter in the decades to come.• If the Planning Authority is mindful to include sites 12 and 29 in its Local Plan, proposals should be drawn up for effective mitigation of the impact of additional traffic movements on Crannaford Lane. Multiple additional roads identified with specific adverse impact from potential development.• The proposed amount of development will swamp the existing settlement due to load on local services and transport links.• The village is served by narrow, often winding lanes with poor visibility. There are occasional passing places. Pavements in the | <ul style="list-style-type: none">• Issues relating to a lack of infrastructure will be considered in the forthcoming Infrastructure Delivery Plan, which will highlight how they should be addressed in delivering development proposed in the Local Plan.• LP_Brcl_09 - Land at Heathfield (south-east of Woodbury View), Broadclyst - Originally a Preferred Allocation in the Local Plan, now an allocation in the Broadclyst Neighbourhood Plan<ul style="list-style-type: none">• This site is now allocated in the Broadclyst Neighbourhood Plan.• LP_Brcl_12 – Land west of Whimple Road, Broadclyst - Preferred Allocation<ul style="list-style-type: none">• It was proposed that only part of this site (Brcl_12a) should be allocated but, in order to facilitate access from Whimple Road (to the east of the site) rather than from Town End, at least part of Brcl_12b should be allocated. This part of the development would include a play area, open space, self-build plots and employment units.• LP_Brcl_18 - Land at Church Lane, Broadclyst - Rejected Site<ul style="list-style-type: none">• This site is within the Broadclyst Conservation Area and is surrounded by Listed Buildings, which resulted in it being ‘sifted out’ of the site selection process. This site is not proposed for allocation and there were no comments contrary to this view.• LP_Brcl_22 – Land at Jarvishayes Farm, Broadclyst - Rejected Site<ul style="list-style-type: none">• Three sides of this site abut the gateway to Broadclyst Conservation Area, with a high presence of Listed buildings, with typical NT yellow estate properties to the east that overlook the site. In this instance, and with the presence of available alternative sites to meet local need, the site was considered unacceptable for future development. |
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centre of the village and surrounding lanes are patchy and inadequate and there is no designated provision for cyclists.

- Concern expressed over pedestrian and cyclist safety.
- Concern expressed over school traffic with congestion and further safety concerns.
- Concern over facilities and infrastructure being at capacity including surface water and sewage management, doctors, schools, road network, education provision, transport.
- The suggested area for development is frequently waterlogged in wet weather and a footpath crossing the fields is often unusable. The lanes alongside this land flood regularly during the winter to the point of being impassable by foot or by car. The floods are not transient and can be slow to drain over days or weeks. Run off water from a large housing development would exacerbate this problem.
- The housing developments in Cranbrook and Westclyst should be sufficient to prevent further building in areas with unsuitable roads and pavements.
- The proposed development of concentrated modern housing would engulf the historical setting of the village, whose character would be damaged and lost for ever.
- The rural setting of Broadclyst offers the local community and visitors the pleasure and health benefits of walking and cycling in the beautiful countryside. These activities were essential for physical and mental well-being of residents during the recent pandemic. The development proposed would impact on the health and wellbeing of local residents and visitors.
- The BUA boundary for Broadclyst in the Broadclyst Neighbourhood Development Plan and the adopted EDLP does not include the preferred sites LP_Brcl_09, LP_Brcl_29 and

- LP_Brcl_29 - Land to the east of Town End, Broadclyst - *Preferred Allocation*
- We have been provided with a technical drawing to confirm how Brcl_29 would be accessed – a new junction to the south-west (pictured below):



- ...which would appear to make the site a more attractive proposition; it would be a remodelling of the junction pictured below:

LP_Brcl_12, but the proposed EDLP seems to have redrawn the boundary (now referred to as a Settlement Boundary) to include these sites. There is no justification to this redrawing and I feel it is misleading and intended to deceive so as to provide justification for development on these 3 preferred sites in accordance with paragraph 3.75 of the proposed EDLP. The original BUA boundary for Broadclyst should be retained when considering development.

- The figure of 175 houses for Broadclyst is totally contrary to the Broadclyst Neighbourhood Development Plan which suggested only 44 houses. There is no justification provided in the proposed EDLP as to why this figure of 44 is no longer relevant.
- The area supports a wide range of birds, insects and wildlife which would inevitably be diminished by the transformation of the village to an urban environment. The preservation and protection of wildlife habitats is essential in the long term for the survival of the planet as acknowledged by Michael Gove in the new measures for the Levelling up and Regeneration Bill (Dec 2022).
- The proposed area of development would involve the loss of rich agricultural land.
- A housing development would lead to the permanent loss of valuable green spaces.
- **LP_Brcl_09 - Land at Heathfield (south-east of Woodbury View), Broadclyst - *Originally a Preferred Allocation in the Local Plan, now an allocation in the Broadclyst Neighbourhood Plan***



- DCC note this has been previously considered by them as the LLFA and is proposed to be allocated in the Neighbourhood Plan.
- Broadclyst Parish Council – Brcl09 received majority support for development from the community in every round of consultation and is in the final draft as a site for 15 homes. It is considered proportional and natural extension to the village, and although any development brings pressure on infrastructure, it was felt that the allocation of an additional maximum of 15 homes was not significant.
- A number of representations objected to the development, with concern over safety, overcrowding, infrastructure issues, flooding, congestion, dangerous roads, increased school run traffic, loss of green space, residents from other towns and villages already using Broadclyst facilities (schools and doctors' surgeries).
- A number of representations expressed concern over the loss of agricultural land, suggested as at odds with government guidance.
- This is a beautiful and desirable area. Development of this area would only provide homes for wealthier people, would add increased load to the already overstretched infrastructure, ruin the countryside, attract residents from outside the local area and would not provide affordable housing. It should NEVER be considered for development!
- There would be a big ecological and environmental impact on the area and would result in a loss of a lot of green space and habitats which are currently home to lots of different wildlife, including bats, birds, butterflies and insects. The proposed site

<p>itself is an area of farmland with mature trees and hedgerows, supporting rich wildlife. The loss of habitat would be devastating.</p> <ul style="list-style-type: none">• The BUA boundary for Broadclyst in the Broadclyst Neighbourhood Development Plan and the adopted EDLP does not include the preferred sites LP_Brcl_09, LP_Brcl_29 and LP_Brcl_12, but the proposed EDLP seems to have redrawn the boundary (now referred to as a Settlement Boundary) to include these sites. There is no justification to this redrawing and I feel it is misleading and intended to deceive so as to provide justification for development on these 3 preferred sites in accordance with paragraph 3.75 of the proposed EDLP. The original BUA boundary for Broadclyst should be retained when considering development.• A number of representations in support of the allocation.• Of the three developments proposed for the area, this one seems the least offensive. That being said, it would be okay if this was the only site proposed, that which it isn't. If developments like these are taking place, the impact on local facilities (employment, GPs, schools, buses, social areas) needs to be seriously considered, it seems to have been just brushed aside.• I feel that this site is of a size and in a situation which is acceptable to the character of the village. The access is reasonable and the number of dwellings should not place an inordinate strain on local resources.• LP_Brcl_12 – Land west of Whimble Road, Broadclyst - Preferred Allocation	
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- The Environment Agency advise that the area of floodzone 2 to the northwest of the site should be secured as green infrastructure and be kept free of built development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- DCC seek clarification on the function and approach to the existing 'pond' which is unclear if this forms part of the allocation.
- Object to Brcl_12 as flooding in the area will only be made worse if this site is developed.
- Roads are not suitable for extra traffic from Brcl_12.
- Brcl_12 will ruin the countryside on this rural side of the village.
- Owner of the New Inn pub objects as housing development, rather than countryside, will discourage visitors from visiting the pub and adversely affect the business.
- Loss of grade one agricultural land a concern.
- Loss of biodiversity a concern, including loss of pond on this site.
- Broadclyst Parish Council -
- In the Clyst Vale Regional Park consultation document there was specific mention of the Winter Gardens site (LP_Brcl_12) as being an important habitat for invertebrates. We therefore would like to see a full environmental and biodiversity impact assessment, commissioned prior to development being agreed, and a proper plan for mitigation if development is allowed to go ahead.

- Site Brcl 12 was presented for consideration during the Call for Sites as both a housing site and an economic site.
- Housing: following an external consultant’s desk-based analysis on the proposed sites, Broadclyst NP steering group was advised that site 12 was too big to bring forward through a NP and should therefore be removed from the Broadclyst NP.
- Economic: consultation responses for economic re-development of the buildings were as follows:
- Quantitative: with 61% of votes in favour, this site has the support of the community.
- b. Qualitative data:
- Good support for employment use and to support small businesses;
- The loss of agricultural land is not a material consideration;
- The environmental impact will be assessed by AECOM;
- Support for regeneration of brown-field site;
- Concerns about access and additional traffic;
- Consider a condition for no B8 use
- Village is sustainable location;
- Development to be subject to noise impact assessment and mitigations if necessary
- Agent for Land Value Alliances (Developer) -
- We consider that this site is a suitable location for development in light of the everyday facilities available in Broadclyst itself, as well as the sustainable transport links available to access both Exeter and Cranbrook via cycling and public transport.
- Given the scale of the site (circa 12 hectares), and in order to achieve sufficient density on the land for housing (30dph), we suggest that draft policy 25 should be amended to increase the

<p>number of homes from 136 dwellings to 160 dwellings, which is considered to be a more appropriate level of development. LVA are also flexible in terms of the mix of housing to be provided on site, including (for example) bungalows, if the authority so desires it – as well as self-build and smaller units.</p> <ul style="list-style-type: none">• A high number of representations object to the allocation citing:• Adverse impact on the local road and transport network with safety concerns for pedestrians, cyclists, and motorists alike.• Adverse impact on local facilities infrastructure including doctors and schools.• Environmental impact of building on GREEN FIELD sites, with impacts on biodiversity and loss of green space.• Increase in light pollution from construction phase and post build out• Loss of Grade 1 agricultural land.• Adverse impact on flooding and local sewage network.• Impact on local heritage.• Impact on the character and rural appearance of Broadclyst.• LP_Brcl_18 - Land at Church Lane, Broadclyst - <i>Rejected Site</i>• No comments. • LP_Brcl_22 – Land at Jarvishayes Farm, Broadclyst - <i>Rejected Site</i>• Surprised to see this site rejected after locals had put it forward through the Neighbourhood Plan. It is of a much smaller scale than the sites proposed on the other side of the village, with good access off the B3181, and is unlikely to require such major	
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<p>infrastructure and flood relief changes. Decision to reject is however supported.</p> <ul style="list-style-type: none">• Two further representations questioning the decision to reject, suggesting that the site has much better access to the village services, footpaths, public transport etc. than the other recommended large sites within the village and would be a scale much more in keeping with the village.•• LP_Brcl_29 - Land to the east of Town End, Broadclyst - Preferred Allocation• Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to the letting of Lake House• Object as located on a very narrow road without footpaths.• These fields are often covered in surface water which will only be displaced if houses are placed here.• The National Trust this policy identifies land to the east of Town End as a preferred allocation for 24 new homes and 0.1 hectares of employment land (allocation reference Brcl_29). They advise - this site is owned by the National Trust as investment land that was donated specifically to fund conservation work on the Killerton Estate. It has always been The National Trust's intention to sell this investment land when an appropriate opportunity arose. For this and adjoining land Brcl_12 the trust advise they would support specific policy requirements, applicable to both sites, to secure high quality	
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<p>development which; respects the local identity of Broadclyst; protects the setting of listed buildings; ensures that sustainable pedestrian and cycle links are provided and wider sustainable links to green infrastructure. They support masterplan production and advise site mapping needs updating.</p> <ul style="list-style-type: none">• Broadclyst Parish Council -• Site Brcl_29 was found by the desk-based assessment to be acceptable for delivery through a NP and progressed through to the first round of public consultation. However, access to the site was a major concern and the site only received support from a total of 31% of consultation respondents, so was withdrawn by the Steering Group and did not progress any further in the draft Neighbourhood Plan.• There are concerns that development on this scale could be detrimental to the intrinsic character of the village, particularly the historic Eastern side of Broadclyst, abutting the proposed sites. This part of the village has many listed and thatched buildings. In particular, with reference to site LP_Brcl_29, any development here would have a direct impact on Lake House which is Grade 2 Listed. The land proposed is also on an elevation that could dominate the surrounding environment. If development is allowed to go ahead, we suggest it must be in keeping with the historic setting and adhere strictly to the design codes set out in The Broadclyst Parish Neighbourhood Plan.• Loss of grade one agricultural land a concern.• Concern that the local highway infrastructure could not cope with the development.• Lack of safe pedestrian routes a concern with potential to encourage car usage.• A high number of representations object to the allocation citing:	
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<ul style="list-style-type: none"> • Adverse impact on the local road and transport network with safety concerns for pedestrians, cyclists, and motorists alike. • Adverse impact on local facilities infrastructure including doctors and schools. • Environmental impact of building on GREEN FIELD sites, with impacts on biodiversity and loss of green space. • Increase in light pollution from construction phase and post build out • Loss of Grade 1 agricultural land. • Adverse impact on flooding and local sewage network. • Impact on local heritage. • Impact on the character and rural appearance of Broadclyst. • Omission sites a Broadclyst • None identified. 	
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Development at Local Centres – Budleigh Salterton

Draft Plan consultation	
<p>Key issues raised in consultation:</p> <p>Budleigh Salterton Parish Council express concern about the proposal for 152 homes because it would put unacceptable strain on the medical resources in the town, which also serve the surrounding villages.</p>	<ul style="list-style-type: none"> • Many of these general issues relate to a lack of infrastructure to support new housing development, such as transport, education, healthcare, sports pitches, and sewage disposal. These matters will be considered in the forthcoming Infrastructure Delivery Plan which will highlight key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan.

- A respondent comments - This consultation shows planned development on what was described as green wedges in the Budleigh Salterton Neighbourhood plan, a plan that was voted on in a referendum by the people of Budleigh Salterton. It looks like East Devon is not referring to this plan? What am I missing here?
- The proposed growth of Budleigh Salterton means it risks losing its distinctiveness and just becoming a suburb of Exmouth.
- Proposed development at Budleigh is totally out of proportion.
- Wain Homes consider that Budleigh suffers from acute housing need, poor housing affordability and an ageing population. It also points out that the town is washed over by the AONB, such that any new development will be in the AONB.

Nb. Devon County Council's consultation response includes a Transport Site Infrastructure Assessment which comprises a summary of the settlement, a list of facilities, transport modes at the settlement, how each of the potential sites could be accessed and the impact this may have on the local transport network – please see the full DCC response for further detail.

LP_Budl_01 – Land adjacent to Clyst Hayes Farmhouse

- Budleigh Salterton Parish Council oppose any development on this site because it is in the AONB, grade 1 agricultural land, would add to traffic congestion on B3178 and the primary school is over subscribed.
- Budleigh Salterton Parish Council state that one of the reasons the town was included in the AONB was because of the attractive vistas and views afforded of the local countryside in this area.

- Aspirations for more affordable housing are noted and requirements are included within Local Plan policy, subject to viability.
- The green wedge is to be retained.
- The percentage increase in housing from the 35 new dwellings proposed is around 1.4% compared to the existing number of houses. This is not considered to be low for a Tier 3 settlement, but reflects the significant constraints to development at the town.
- LP_Budl_01 – Land adjacent to Clyst Hayes Farmhouse
- The concerns about the impacts of development on this site are recognised and the site is no longer proposed for allocation.
- LP_Budl_02 - Land at Barn Lane, Knowle
- The concerns about the impacts of development on this site are recognised. Given the limited number of available sites in the town this is considered to be the best option for growth available. Landscape and heritage impacts can be mitigated through careful layout and design.
- No other sites have been proposed for allocation.

- Devon County Council query whether green infrastructure should be provided, and development may require a sewer requisition to the watercourse if infiltration is unfeasible.
- A large site outside the town boundary.
- A few respondents consider the site an attractive and important green wedge for the town.
- Gives this part of Budleigh a semi-rural character.
- Some respondents expressed concern about the impact of additional cars on Knowle Road where traffic is already a problem.
- Would undermine attractive character of area.
- Development would add to flooding issues.
- Dark Lane is a medieval track.
- AONB location.
- Some respondents were concerned about the loss of good quality agricultural land.
- Plenty of brownfield sites and empty buildings in north.
- Very sensitive location – don't destroy every piece of green space until Budleigh's unique character is gone forever.
- 300 homes would be unacceptable on traffic grounds but would support 50 homes with road improvements where narrow.
- The landowner supports the allocation of this site for housing. It is deliverable as a housing site and is well related to the existing built up area. It is well provided with facilities and there is a strong need for a mix of new housing including affordable housing.

LP_Budl_02 - Land at Barn Lane, Knowle - *Potential 'Second Best' Allocation*

- Budleigh Salterton Parish Council oppose any development on this site, which is grade 1 agricultural land, in a drinking water protection zone and could be at risk of flooding.
- Budleigh Salterton Parish Council state that one of the reasons the town was included in the AONB was because of the attractive vistas and views afforded of the local countryside in this area.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Wain Homes, which controls the site, comment that;
 - The site abuts the BUAB on two sides and is sustainable in other respects.
 - The characteristics of Budleigh and its surroundings and the scale and nature of the site and the proposed development indicate clearly that the scheme would not be “major” development in the AONB.
 - Landscape and other effects can be adequately mitigated.
 - The site could deliver about 50 market and affordable homes, public open space (including play space), safe access and off-road pedestrian and cycle connections to the town centre. This would represent a 2% increase in population for the town.
 - The site is relatively self-contained and the effects on long and short views and on the wider AONB can be mitigated through layout, design, materials and landscaping.
 - All other effects can be mitigated, with the exception of the loss of agricultural land where any harm arising would be

considered in the context of the remaining provision of best and most versatile land and would weigh in the planning balance against a range of public benefits arising from the scheme.

- Some respondents object as in the AONB.
- Object as too far from the town centre.
- Contrary to local plan policy because would not conserve or enhance the character and natural beauty of the AONB.
- Loss of good agricultural land.
- Allocation of this scale is not required.
- Site is in a drinking water protection zone.
- Inadequate pavement provision for site to the west.
- The landowner supports the allocation of this site for housing. It is deliverable as a housing site and is well related to the existing built up area. It is well provided with facilities and there is a strong need for a mix of new housing including affordable housing.

LP_Budl_03 - Land at Barn Lane, Knowle - *Potential 'Second Best' Allocation*

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to key views from principle elevation of Grade 2* Tidwell House
- Some respondents object as in the AONB.
- Object as too far from the town centre for older people.
- Loss of agricultural land.

- Contrary to local plan policy because would not conserve or enhance the character and natural beauty of the AONB.
 - Roads inadequate.
 - Allocation of this scale not required.
 - The landowner supports the allocation of this site for housing. It is deliverable as a housing site and is well related to the existing built up area. It is well provided with facilities and there is a strong need for a mix of new housing including affordable housing.
- LP_Budl_04 – The Old Orchard, Halse Hill - *Rejected Site***
- Budleigh Salterton Parish Council oppose any development on this site.
 - Budleigh Salterton Parish Council agree that the site is unachievable and forms part of a green wedge designated in the neighbourhood plan. Green Wedges such as this site were instrumental in AONB's decision to include the whole of Budleigh Salterton in AONB.
 - Will reappear as a 'windfall'
 - Next to conservation area with protected trees on boundary.
 - Opposite important woodland.
 - Should be included in the conservation area so that it is protected.
 - Site unsuitable and could flood.
- LP_Budl_05 - Little Knowle - *Rejected Site***
- Budleigh Salterton Parish Council oppose any development on this site, which is adjacent to a green wedge, is at risk of flooding and the existing field forms an attractive feature in the street scene.

- Site unsuitable due to flooding.
 - Dark Lane unsuitable for additional traffic and of historical and geological interest.
 - Road network unsuitable for additional traffic.
 - Would damage character of AONB.
 - Poor access and visibility.
 - Attractive field.
 - SWW has a holding tank on part of the site.
 - Erosion of rural environment.
 - Should be left as attractive feature in street scene.
- LP_Budl_06 - Budleigh Salterton Community Hospital - Preferred Allocation**
- Budleigh Salterton Parish Council oppose any development on this site, which had been earmarked for closure, but is now a community health hub.
 - Many respondents object to any loss of a much used and highly valued health and community facility.
- LP_Budl_07 - The Old Smithy, Dalditch Lane - New Site - not assessed**
- Budleigh Salterton Parish Council agree that this site is not suitable for development.
 - The Environment Agency advise that the site is within floodzone 3 and would need to be subject to SFRA2, and the sequential and exception tests before being allocated.
 - Would destroy quiet rural aspect on outskirts of town and encourage urban expansion.
 - Agree should not be allocated but should be considered for self-build.

LP_Budl_08 - Lower Station Road Car Park - New Site - not assessed

- Budleigh Salterton Parish Council oppose any development on this site pending the result of the HELAA as it is a well used car park that reduces congestion.
- Loss of parking.
- Should remain to serve the public hall.
- Unusual shape not suited to housing.
- Increase in traffic from residents would endanger the users of the hall.

LP_Budl_09 - Brook Road car park - New Site - not assessed

- Budleigh Salterton Parish Council agrees that this site is unsuitable for development because of its size and the risk of flooding.
- The Environment Agency advise that the site is within floodzone 3 and would need to be subject to SFRA2, and the sequential and exception tests before being allocated.
- Invaluable parking close to High Street for the infirm.
- Should be kept for original use.

Omission sites at Budleigh Salterton

None identified.

Development at Local Centres – Colyton

Draft Plan consultation

<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Scale of development at Colyton and Colyford will adversely impact on River Axe SAC/water quality due to poor quality sewage system. • Colyton’s infrastructure cannot cope with more housing – the primary school is full, lack of car parking. • There is no need for more housing as the EDDC Housing Needs Survey (2022) states there is a need for 12 affordable homes which will be met by 14 affordable homes at for CeramTec site. • There are already two new developments on Coly Road (Saxon Meadow, land at Yaffles), plus the imminent 72 homes and 6 business units at former CeramTec site, so Colyton does not need any more housing. • Lack of jobs in Colyton means residents of new housing will have to commute elsewhere. • Coly_02 were rejected at appeal, too far to walk into town centre, loss of privacy due to level differences and spoiling views of AONB. • Roads not suitable for extra traffic. • A smaller amount of development is proposed at Colyton compared to other local centres, no explanation as to why. • Proposed sites at Colyton are of Great Landscape Value and highly visible from across the Axe Valley and would erode the rural setting of Colyton. <p>LP_Coly_01 - Land to the west of Fair View Lane - <i>Rejected Allocation</i></p> <ul style="list-style-type: none"> • One respondent criticised the use of the term “too remote” as a reason for rejecting the site. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • General Issues • Issues relating to a lack of infrastructure will be considered in the forthcoming Infrastructure Delivery Plan, which will highlight how they should be addressed in delivering development proposed in the Local Plan. • Pressures on the local school were of particular note. <p>LP_Coly_01 - Land to the west of Fair View Lane - <i>Rejected Allocation</i></p> <ul style="list-style-type: none"> • This site was correctly rejected for being too remote from facilities within Colyton. <p>LP_Coly_02a & LP_Coly_02b - Land at Hillhead - 2a Preferred Allocation / 2b Potential ‘Second Best’ Allocation</p> <ul style="list-style-type: none"> • The western part of this site (Coly_2b) is clearly more visually prominent than the eastern portion and development here would have a far greater landscape impact – which is why this section of the site was initially only put forward as a ‘second best’ allocation. <p>LP_Coly_03 - Land adjacent to Fair View Lane - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • The site forms part of a rich and complex landscape on rising ground in a bucolic setting. It would be highly sensitive to change and is rejected for allocation. <p>LP_Coly_06 - Land to the east of Colyton - <i>Originally a Rejected Site, now a Preferred Allocation</i></p> <ul style="list-style-type: none"> • Criticism that this site was rejected on the grounds of being in a flood zone when permissions had been granted in close proximity which are also in the flood zone were noted and this site is now, partly, recommended for allocation. • Concerns were expressed that this site is the only available potential site for a future new school.
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LP_Coly_02a & LP_Coly_02b - Land at Hillhead - 2a Preferred Allocation / 2b Potential 'Second Best' Allocation

- Reasons for objecting to this site included the loss of scenic views, the negative impact on the East Devon AONB, the capacity of the sewage system / water run-off (increasing the risk of flooding), the damage to local wildlife habitats (including the adverse ecological effect on the Beer Quarry Caves SAC) and ancient hedgerows, the loss of farmland, pressures on the local school, access (both vehicular and pedestrian), lack of public transport and new employment opportunities, that the site is on land outside of the development area and the increase in traffic and light & air pollution.
- Other comments made reference to the prominent position of the site (above 200ft) and the potential for views into the site from the AONB being spoilt. Respondents said development would be harmful to the landscape and also damaging to the setting of Colyton itself.
- One respondent said that housing quotas in the Colyton Neighbourhood Plan should be used as the benchmark rather than the new Local Plan, whilst another said Government targets were now “advisory” rather than “mandatory” and should be treated as such. Others said development of this site would be contrary to policies in the Colyton NP, which should be respected.
- Another comment said houses should be built where there are employment opportunities, in places such as Exeter, Honiton or Axminster, rather than Colyton.
- There was a feeling that development would erode the existing “marked and abrupt transition” from town to countryside and that new homes would be too far away from facilities.

LP_Coly_07 - Land to the east of Fair View Lane - *Rejected Site*

- This site was correctly rejected for being too remote from facilities within Colyton.

LP_Coly_09 - Land adjoining Clay Lane - *Rejected Site*

- This site was correctly rejected for being too remote from facilities within Colyton and also for being so visually prominent on elevated ground above the town. There were no comments which disagreed with this view.

LP_Coly_10 - Land on the east side of Apple Orchard - *Rejected Site*

- This site was rejected due to access issues and no comments were expressed on this site during the consultation.

- Reference was made to a scheme for large-scale housing on this site that had previously been rejected (15/1758/MOUT) due to the site’s location in the countryside and its acknowledged value to the landscape setting of the town. One respondent referred to the site being in the Local Plan 1995-2011 as an Area of Great Landscape Value, so questioned why it could now be seen as suitable for development.
- Another criticism was that the allocation would not meet the sustainability objectives of the NPPF, which are “interdependent and require land to be co-ordinated with the provision of associated infrastructure and contribute to protecting & enhancing the natural environment”.
- Many suggested that Clay Lane is unsuitable to accommodate the additional traffic that this development would generate. It was noted that Hillhead is steep and not conducive to walking into town, and that there was blind corner access from Hillhead to Old Sidmouth Road, with considerable on-road parking at the junction with Burnards Field Road (with a lack of parking for existing bungalows there).
- Reference was also made to existing properties losing privacy, as new dwellings would overlook directly into bedrooms, light would be lost in gardens and that there would be increase in noise & traffic danger on Hillhead.
- It was suggested that there is still sufficient opportunity within the boundaries of Colyton to meet need in the foreseeable future.
- On a positive note, some respondents were keen to point out that the new owners of the site has committed to taking care in regard to any drainage, traffic and access issues, and that a well-built and environmentally friendly proposal, in conjunction with reasonable purchase costs, would be of benefit for local people

(particularly first time buyers or those in need of affordable housing).

LP_Coly_03 - Land adjacent to Fair View Lane - *Rejected Site*

- One respondent suggested this site would be a better option to develop than Hillhead (Coly_02) whilst another respondent suggested Coly_06 would be a better option.
- Other concerns included the capacity of the primary school (with Coly_06 the suggestion for the location of a new school) and the adequacy of the sewage system.
- Developer (Baker Estates) not clear why this site has not been allocated as would be delivered to a high standard.

LP_Coly_06 - Land to the east of Colyton - *Originally a Rejected Site, now a partly Preferred Allocation*

- Prefer this site for new housing rather than Coly_02.
- There was criticism that this site was rejected on the grounds of being in a flood zone when permissions had been granted in close proximity which are also in the flood zone.

LP_Coly_07 - Land to the east of Fair View Lane - *Rejected Site*

- One respondent agreed with the decision to reject the site, making reference to the amount of wildlife in the area.

LP_Coly_09 - Land adjoining Clay Lane - *Rejected Site*

Respondents agreed that this site should be rejected for development because of the beautiful surroundings, visibility of the site, loss of farmland, the wildlife present on site and its use as a favoured area for walking.

LP_Coly_10 - Land on the east side of Apple Orchard - *Rejected Site*

- No comments

Omission sites at Colyton

• None identified.	
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Development at Local Centres – Lympstone

Draft Plan consultation

<p>Key issues raised in consultation: General</p> <ul style="list-style-type: none"> • Devon County Council are concerned about primary school capacity at Lympstone. • Lympstone Parish Council held an open public session where issues were raised relating to A376 already at capacity, need to maintain Green Wedge and Coastal Preservation Area, highways access, infrastructure requirements, flooding, maintain Exmouth-Lympstone gap. • A site promoter supports allocations in tier 3 settlements, particularly where there are good sustainable transport links such as at Lympstone. Villages have been under provided for in past Local Plans and therefore appropriately sized allocations such as GH/ED/73 are needed to deliver local housing needs and to support the vibrancy of villages and their services. • Concerns that proposed development at Lympstone would place excessive strains on services and facilities. • The gap between Lympstone and Exmouth should not be eroded and accommodate development. 	<p>Officer commentary in response: General</p> <ul style="list-style-type: none"> • Many of these general issues relate to a lack of infrastructure to support new housing development, such as transport, education, healthcare, and sewerage. These matters will be considered in the forthcoming Infrastructure Delivery Plan which will highlight key infrastructure issues and how they should be addressed to deliver development proposed in the Local Plan. • In general terms, Lympstone has excellent sustainable travel links and a range of local facilities, and development should be allocated to meet local needs and those in immediate surrounds. • The scale of housing in the Draft Local Plan was 215 dwellings at Lympstone, but further assessment recommends rejecting site GH/ED/72 for 131 dwellings, meaning a far lower scale of growth that is more proportionate with the existing settlement and the Local Plan spatial strategy. • It is noted that sites adjoining the northern edge of Exmouth are within Lympstone parish, but the Local Plan is based upon settlements and adjacent sites, rather than parish boundaries which often to do not relate to actual settlements 'on the ground'.
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<ul style="list-style-type: none">• New housing in and around Lympstone is disproportionate to the existing village.• Development will overwhelm the resources (school, GP) and infrastructure (surface drainage, sewerage, roads).• RD&E is already at capacity, and there will never be sufficient infrastructure of any type in Lympstone village to support that amount of increased housing, traffic and families such as their need for schools, doctors' surgeries, parking etc.• Proposals ignore the Lympstone Neighbourhood Plan.• Proposals will add to traffic on the A376 which is already seriously congested / at capacity, particularly with other proposals to develop Exton and Exmouth.• There is minimal employment in Lympstone so new housing will mean out-commuting.• Most of Exmouth's development is being pushed into Lympstone parish.• The real number of homes being allocated to Lympstone is 499, as a further 202 houses are in Lympstone parish but allocated to Exmouth.• Affordable homes need to be addressed. Homes already built in Lympstone are way out of affordable homes for the upcoming young in our village school.eg homes by the church all out of the price bracket for young with growing families.• National Highways anticipate growth here to be significantly Exeter facing, creating commuter and leisure trips through M5 Junction 30, and future discussions with National	<ul style="list-style-type: none">• Aspirations for more affordable housing are noted and requirements are included within Local Plan policy, subject to viability.• The emerging Local Plan supports the delivery of employment land. <p>LP_GH/ED/71 - Gulliford Farm, Exmouth Road, Lympstone - Rejected Site</p> <ul style="list-style-type: none">• Although this site adjoins another site (GH/ED/72) that is adjacent to the settlement, it is not well related to Lympstone as it is located on the other side of a ridge with no perception of Lympstone - therefore fails site sifting and should not be subject to site assessment.• LP_GH/ED/72 - Land at Meeting Lane, Lympstone - Preferred Allocation• The support of a prospective developer and others who recognise that development helps maintain shops, schools, pubs and other facilities.• The setting of Nutwell Court, an attractive parkland around a Grade II* listed country house, has been considered in the site assessment, but our records do not show this area as a "registered park".• The parish boundary is not a planning issue in considering whether to allocate the site, which is adjacent to Lympstone so would count towards its housing provision. Similarly, the impact on nearby property values is not a planning issue.• With regards to landscape and other environmental issues, it is agreed that the site is visible from the A376, with views of the site that generally show an undeveloped, wooded skyline, but lightly settled on south west edge where there are existing dwellings – overall the sites has a high/medium landscape sensitivity to new development.• Developing the site will not lead to coalescence of settlements.• The loss of farming land is an important issue, with the west field being Grade 1 agricultural land, and the east field is Grade 3.
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<p>Highways is required on transport assessment and potential mitigation.</p> <ul style="list-style-type: none">• The health, well-being and quality of life of Lypstone residents, and of those in the west of East Devon, has been disregarded. The result is a report that erodes trust and leaves residents feeling ignored, disheartened and helpless.• Communities recognise the need for development but members and officers of EDDC should be seeking organic, sustainable and equitable growth across all of East Devon.• Communities like Lypstone deserve the opportunity to thrive and survive rather than be buried in inappropriate housing simply to shelter other areas of East Devon from any development.• The plan states ‘proximity to employment’ as a reason for development. Lypstone is a village and provides minimal employment. These houses, outside Lypstone and Exmouth BUABs, will be habited by absent property investors, second-homers, holiday lets and commuters to Exeter and further afield. They will not be part of Lypstone or Exmouth.• For your information, a Fol request showed that as at 20 May 2022 there were 2,637 second homes in East Devon and of these 603 (23%) were in the Exmouth and Lypstone parishes. In addition, at the same date there were 1,909 Empty properties in East Devon and 491 (26%) of these were in the Exmouth and Lypstone parishes. It is likely that one quarter of any development will provide second homes rather than needed primary homes for residents.	<ul style="list-style-type: none">• There is a small area of 1/100 year surface water flood risk in the south west part of site.• The site has some biodiversity value, being located within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone with a minor adverse effect predicted (not significant) overall.• The conflict with the neighbourhood plan is noted, but the Local Plan strategic policies take precedence (when adopted).• A range of facilities are within 1,600m of the site (considered an upper walking distance) – both Nutwell Road and Meeting Lane lack footpaths along the site boundary, but Meeting Lane footpath begins on southern edge where there is an existing housing estate, so this is a reasonably accessible site.• Infrastructure constraints are noted and will be considered in the forthcoming Infrastructure Delivery Plan which will highlight key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan.• The suggested presence of a culverted unmapped ordinary watercourse is noted. <p>LP_GH/ED/73 - Land north-west of Strawberry Hill, Lypstone - Preferred Allocation</p> <ul style="list-style-type: none">• The support of the site promoter, apart from the employment provision, is noted. As discussed under Strategic Policy 5, the Council agrees with objectors that on-site employment provision is not justified for all allocations.• A range of facilities are within 1,600m of the site (considered an upper walking distance) – both Strawberry Hill and Meeting Lane lack
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<ul style="list-style-type: none"> Concerned and alarmed that Lympstone has been designated as a ‘Service Centre’ and that this is then used as the basis to allow a much greater level of development, including provision of industrial and commercial buildings as part of new development. Putting Lympstone on a par with, for example, Budleigh Salterton, is clearly wrong; Lympstone, with one shop and one part-time art gallery and no through roads lacks any reality as a ‘service centre’. On the proviso that you are able to make the substantial investments in infrastructure required before significant development we think the best place to build new houses in or around Lympstone is on your 'Second Choice' site adjacent to Courtlands Lane. Overall, we feel this site would have a less deleterious impact on Lympstone than your 'Preferred' option either side of Meeting Lane. Around 200 of Exmouth’s housing allocation are sited in Lympstone, not Exmouth. Lympstone is choked with traffic and has no available space for development. Object to proposed development at Exton and Lympstone as it would impinge on the green wedge and adversely affect their character. Agent for the landowner - The overall rationalisation of the Built-up Area Boundary, both to reflect previous built development and to identify suitable locations for additional future development, is considered reasonable and justified. <p>LP_GH/ED/71 - Gulliford Farm, Exmouth Road, Lympstone - Rejected Site</p>	<p>footpaths along site boundary, but Meeting Lane footpath begins on NW edge where there is an existing housing estate.</p> <ul style="list-style-type: none"> With regards to landscape and other environmental issues, the site is enclosed by two lanes, with existing dwellings along southern boundary and to north east and overall a medium landscape sensitivity to new development. Developing the site will not lead to coalescence of settlements. The site is a mix of grade 1 (covering west part of site) and grade 3 agricultural land, so there would be some loss of best and most versatile agricultural land. The site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone leading to a minor adverse effect predicted (not significant) upon ecology. Infrastructure constraints are noted and will be considered in the forthcoming Infrastructure Delivery Plan which will highlight key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan. The suggested presence of a culverted unmapped ordinary watercourse is noted. <p>LP_GH/ED/74 - Land at Strawberry Hill, Lympstone - Rejected Site</p> <ul style="list-style-type: none"> Note the support given for rejecting this site and agree for a range of reasons: High/ medium landscape sensitivity to new development; medium impact on historic environment with 3x Grade II listed buildings within 100m; an Unconfirmed Wildlife Site present on site leading to a significant moderate adverse effect on ecology; poor pedestrian accessibility. Whilst the site in isolation accords with the spatial strategy, when combined with other (more preferable) sites, the level of growth is too high and would not be consistent with the spatial strategy.
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- It would ruin the character of the village, taking away rural green areas. Poor access and unsustainable location, not near rail. No jobs or shops anywhere near it. Dramatically increases traffic and cars on busy A376 and roads into Lympstone.
- Far too big to be tacked on to Lympstone Village. A development of this magnitude cannot be tagged on with considerable negative impact on this infrastructure. Lympstone also prides itself on its sense of identity - this is maintained by its green field separation from neighbouring towns, villages, and other developments.
- Prime agricultural land needed for agriculture. Only access is onto A376 which is easily gridlocked. Frequently floods on to adjoining roads. Infrastructure not in place to support more people eg health and education.
- Good access on bus routes. Hidden from main road view.

LP_GH/ED/72 - Land at Meeting Lane, Lympstone - Preferred Allocation

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation.
- DCC state a culverted unmapped ordinary watercourse appears to cross centrally through the site and should seek opportunities to daylight and enhance this watercourse.
- A significant number of objections were received.
- This development will have a huge and negative impact on the health and wellbeing of Lympstone Parish residents.

LP_GH/ED/75 - Land off Grange Close, Lympstone - Preferred Allocation

- The support from the parish council for small scale development and site promoter is noted.
- Although access via an existing cul-de-sac is restricted, the limited number of dwellings proposed is acceptable. The site is enclosed, small scale, and well related to the existing settlement edge meaning a low landscape sensitivity.
- The site is within both the Exe Estuary SPA HRA mitigation zone and the East Devon Pebblebed Heaths SAC HRA mitigation zone leading to a minor adverse effect predicted (not significant) upon ecology.
- Infrastructure constraints are noted and will be considered in the forthcoming Infrastructure Delivery Plan which will highlight key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan, although the small scale of this site means limited impacts.
- The point that the site is too small for 6 houses is valid, as local characteristics of low density, urban fringe, development means that the standard HELAA yield of 6 dwellings should be reduced to 3 – below the threshold of 5 dwellings to be considered for allocation in the Local Plan.

LP_Lymp_01 - Little Paddocks, 22 Underhill Crescent, Lympstone - Preferred Allocation

- The support from the landowner and some local residents as broadly consistent with Neighbourhood Plan is noted.

- Lymphstone PC -
 - This site is in Woodbury Parish but, if it is adopted, will impact Lymphstone far more. Woodbury PC passed a motion to pass CIL money to Lymphstone if this development is built but this intention could be rescinded and there is no regulation in place to ensure payment would happen.
 - As this development would sit in Woodbury Parish, precepts would pass to Woodbury and this is unacceptable as all the strain falls upon Lymphstone. Lymphstone’s services and infrastructure would be unfairly strained if the site proceeded.
 - Even when asked if development took place on this site and it guaranteed provision of sports facilities and the dangerous junction accessing the A376 addressed, 60% still opposed development here and in GD/ED/73.
 - Heading south on the A376 this site is clearly visible. 131 houses will completely scar the rural landscape, impact the approach to Lymphstone and change the character of the north side of the village (as referred to in historic documents covering Nutwell Court and Gulliford Farm).
- The allocation is contrary to the neighbourhood plan approved in a local referendum. As a parish, we were assured that if we took the time to create a neighbourhood plan, this would protect the nature of the village from unwanted development. However, the built-up boundary for Lymphstone has been quietly altered by EDDC with no local consultation.
- The agent on behalf of the site owners has submitted a number of technical documents (relating to flooding, ecology, drainage and highways/access) to support their submission

- With regards to access, DCC state “the necessary visibility will be required but potentially ok as on the outside of a bend” and the Council agrees.
- Infrastructure constraints are noted and will be considered in the forthcoming Infrastructure Delivery Plan which will highlight key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan, although the small scale of this site means limited impacts.
- Do not agree there will be a huge negative impact on residents or the environment given the small scale of this site. Existing dwellings around provide a built context, and overall, low landscape sensitivity to new development that will not adversely affect the Green Wedge.

LP_Lymp_02 - Land lying north of Clay Lane, Lymphstone - Rejected Site

- Site constraints are noted.

LP_Lymp_03 - Lymphstone Nurseries - Planning Permission Granted

- This site has now been completed, so not relevant for Local Plan site allocation.

LP_Lymp_04 - Land to the south of Meadowgate Cottage, Church Road, Lymphstone - Rejected Site

- The site constraints are noted.

LP_Lymp_05 - Land to the south-west of Dawlish Park Terrace, Lymphstone - Rejected Site

- The site constraints are noted.

<p>that this site is suitable for development. They object to the requirement for a mixed use scheme to incorporate 0.52ha of employment.</p> <ul style="list-style-type: none"> • I am a private resident of Glebelands road Lympstone. The impact of building directly behind us will not only be felt by a decrease in my property value, my and my family’s wellbeing of having to endure living behind a major building site for a protracted period. • The GH/ED/72 – 73 and 75 sites, which I am sure many residents are unaware of, are within the Woodbury Parish Council so therefore, Woodbury Parish Council would be collecting income and making decisions which impact on Lympstone rather than their own village. These sites will not be counted towards Lympstone quota and more housing will be required to fulfil Lympstone’s quota of housing, this is very detrimental to Lympstone. • Suggestions in the report of easy access to bus and rail and employment opportunities are unrealistic and presented in a misleading manner. Car use will be the norm for persons to travel to work on already overcrowded roads. • The current infrastructure struggles to cope and schools, GPs, roads, public transport, flooding, drainage and sewage will be impacted upon. Few, if any, other areas of East Devon are being impacted upon in such a significant and disproportionate manner. Additionally, the A376 and RD&E hospital are both at capacity. • Residents at this site suggested as remote from village core and therefore reliant on cars for travel. • Housing density of site as proposed suggested a too high. 	<ul style="list-style-type: none"> • The site is not located within or adjoining an existing development, so is not consistent with the Local Plan spatial strategy. <p>LP_Lymp_06 - Hollywell Nurseries, Courtlands Lane, Lympstone - Planning Permission Granted</p> <ul style="list-style-type: none"> • The site constraints are noted. • Agree that there is no planning permission for this site. • It is not located within or adjoining an existing development, so is not consistent with the Local Plan spatial strategy. <p>LP_Lymp_11 - Land off Harefield Road, Lympstone - Rejected Site</p> <ul style="list-style-type: none"> • None. • LP_Lymp_16 - Land off Underhill Close, Lympstone - Planning Permission Granted • Noted – the site can either be delivered for one dwelling as consented or consider afresh for more dwellings through a new planning application. <p>LP_Wood_39 - Rose Cottage, Exmouth Road - Rejected Site</p> <ul style="list-style-type: none"> • None <p>LP_Wood_43 - Land near Exmouth Road, Nutwell Road, Lympstone - Rejected Site</p> <ul style="list-style-type: none"> • None. <p>LP_Wood_44 - Land at Nutwell Road, Lympstone - Rejected Site</p> <ul style="list-style-type: none"> • None.
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- The development will have significant negative effects on the environment.
- Farming land will be lost and the Coastal Preservation Area will be built upon and permanently lost – this directly contradicts your policy.
- Loss of ancient meadow land with flood implications.
- The green wedge between Lymptone and Exmouth will be seriously eroded; this directly contradicts your policy. It will accelerate the coalescence of settlements, destroying the sense of place and identity for residents.
- Valuable wildlife corridors will be lost / loss of biodiversity.
- Important areas of landscape and visual amenity will be lost forever.
- A small number of comments expressed support for the site.
- Out of other sites this site does adjoin houses already and would look like a natural extension.
- A new access would be good along Nutwell road but Meeting lane i believe is on a bus route as there are 4 bus stops next to the site.
- Every village needs some growth to maintain its shops, schools even the pubs.
- The houses wouldn't be visible from the main road and if done nicely would be a lovely place to live.
- There are footpaths and cycle paths that could join this development enabling you to be safe when walking or cycling.
- Suitable site to build on- adjoins existing housing, you could walk to the bus stops and train station as well as local shops.

- A development that reflects local character would be welcomed.
 - Site has sufficient space for local green spaces.
- LP_GH/ED/73 - Land north-west of Strawberry Hill, Lympstone - Preferred Allocation**
- DCC state a culverted unmapped ordinary watercourse appears to cross centrally through the site and should seek opportunities to daylight and enhance this watercourse.
 - A site promoter considers the site to represent a sensible ‘rounding off’ of the settlement and notes that it is well contained by roads and the settlement boundary. However, they do not consider it to be suitable any employment use (they state that it would be incongruous in this village setting) and question why this is proposed when residents of the proposed housing would have easy access to employment via train in Exmouth and Exeter or via an easy cycle ride to the Woodbury Business Park.
 - Lympstone PC - A proportion of residents accepted that some development was inevitable and reluctantly thought it a possible site. (Other concerns as expressed above/below notwithstanding).
 - A significant number of objections were received.
 - This development, in conjunction with the others, will have a huge and negative impact on the health and wellbeing of Lympstone Parish residents.
 - Suggestions in the report of easy access to bus and rail and employment opportunities are unrealistic and presented in a misleading manner. Car use will be the norm for persons to travel to work on already overcrowded roads.

- The current infrastructure struggles to cope and schools, GPs, roads, public transport, flooding, drainage and sewage will be impacted upon. Few, if any, other areas of East Devon are being impacted upon in such a significant and disproportionate manner. Additionally, the A376 and RD&E hospital are both at capacity.
- The development will have significant negative effects on the environment.
- Farming land will be lost and the coastal preservation area will be built upon and permanently lost – this directly contradicts your policy.
- The green wedge between Lypstone and Exmouth will be seriously eroded; this directly contradicts your policy. It will accelerate the coalescence of settlements, destroying the sense of place and identity for residents.
- The open character of a green lung will be lost negatively impacting on the health and wellbeing of residents.
- Valuable wildlife corridors will be lost.
- Important areas of landscape and visual amenity will be lost forever.
- A small number of supporting comments were received.
- The site appears suitable for development provided an excessive number of properties and access roadways/pathways are not built. The worry being flooding of site and adjacent roads, particularly as there appears to be a natural spring on site.
- The Northern end of the site at Meeting Lane should be the boundary of the built-up area.

- This site is suitable and could be developed sympathetically. Housing should be of a good design i.e cottage style and affordable.
- DEVON BANK along Strawberry Hill must be kept, it is good visual entrance to the village, as well as for wildlife; this is also a natural speed calming measure. Entrance to the development for vehicles should be off Meeting Lane only with a pedestrian access onto Strawberry Hill.
- Site is already next to new houses.
- Natural extension of existing houses. Has a natural spring so water run off etc would have to be carefully mitigated. Not as good as the other site with regards to access and linking up of footpaths and open space.

LP_GH/ED/74 - Land at Strawberry Hill, Lympstone - Rejected Site

- Completely outside the Neighbourhood plan and huge extension to the village boundary. Also unsuitable for housing given its exposed nature and the impact on flooding. Would put significant pressure on already strained local services. Good to see it has been rejected.
- Happy that this site has been rejected for development. It must be protected for the sake of wildlife, the environment, and local residents.
- This should be a green wedge to protect Lympstone Village's identity and is a beautiful gateway to the village. Building on this land would have a detrimental impact to the area. It is virgin green belt, a wildlife corridor between the River Exe and Pebble bed Heath and has a high landscape sensitivity to new development including the close proximity of St

Peter's school and other Grade 11 listed buildings. This land should remain as good agricultural land which is in the Coastal Preservation Area and must remain protected. If this land goes to development along with others along the A376 it will be a continual mass development between Clyst St George and Exmouth which must NOT happen, as village communities will be lost.

- Steep site.

LP_GH/ED/74 - Land at Strawberry Hill, Lympstone - Rejected Site

- Lympstone PC -

- This site was the only one from the Public Consultation that received a majority of 52% in favour of development.

- A proportion of residents accepted that some development was inevitable and reluctantly thought it a possible site. (Other concerns as expressed above/below notwithstanding).

- The site is for a small number of dwellings which our Neighbourhood Plan and residents prefer.

- Site promoter supports allocation as a sensible 'rounding off' of the settlement.
- This development will have a huge negative impact on the health and wellbeing of Lympstone Parish residents.
- Access to the proposed site is via Grange Close, a small cul-de-sac, with a narrow curved private road at the end. This is entirely unsuitable as an access for construction vehicles.
- The increase in traffic, through the narrow cul-de-sac, would cause significant disruption and risk to safety for the occupants of the existing 12 properties.

- The current infrastructure struggles to cope and schools, GPs, roads, public transport, flooding, drainage and sewage will be negatively impacted upon. Few, if any, other areas of East Devon are being impacted upon in such a significant and disproportionate manner. Additionally, the A376 and RD&E hospital are both at capacity.
- Land will be lost and the Coastal Preservation Area will be built upon and permanently lost – this directly contradicts your policy.
- The development will have significant negative effects on the environment.
- The open character of a green lung will be lost, negatively impacting on the health and wellbeing of residents.
- Valuable wildlife corridors will be lost.
- Unsuitable access for construction phase.
- Suggestions that the site is too small for 6 houses.
- Important areas of landscape and visual amenity will be lost forever.
- A small number of supportive comments.
- It is a natural rounding off of the village boundary and can be developed without significant impact on the surrounding area.
- This proposal is for only 6 houses, which would be OK were this the only current proposal. However, the overall aggregate of proposed new housing in the village is beyond our current capacity.
- Not highly visible, contingent with existing housing. Would need to make sure that density was appropriate and included provision for necessary impact assessment on traffic, infrastructure etc.

- Logical extension of existing houses. Only concern would be more cars entering Longmeadow road and trying to exit at the Saddlers Arms.
- LP_Lymp_01 - Little Paddocks, 22 Underhill Crescent, Lympstone - Preferred Allocation**
- This will be hugely destructive, in an elevated location that will disproportionately impact on the amenity of the village.
 - The only access is on to the Underhill Crescent/Underhill junction which is congested and dangerous with poor visibility due to on-street car parking.
 - Lympstone PC -
 - A proportion of residents accepted that some development was inevitable and reluctantly thought it a possible site. (Other concerns as expressed above/below notwithstanding).
 - The site is for a small number of dwellings which our Neighbourhood Plan and residents prefer.
 - Likely to generate more on-street car parking in an area where this is already an issue.
 - This development will have a huge negative impact on the health and wellbeing of Lympstone Parish residents.
 - The current infrastructure struggles to cope and schools, GPs, roads, public transport, flooding and drainage will be negatively impacted upon. Few, if any, other areas of East Devon are being impacted upon in such a significant and disproportionate manner. Additionally, the A376 and RD&E hospital are both at capacity.
 - The development will have significant negative effects on the environment.

- Farming land will be lost and the Coastal Preservation Area will be built upon and permanently lost – this directly contradicts your proposed policy.
 - The green wedge between Lympstone and Exmouth will be seriously eroded, which directly contradicts your policy. It will accelerate the coalescence of settlements, destroying the sense of place and identity for residents.
 - The open character of a green lung will be lost, negatively impacting on the health and wellbeing of residents.
 - Valuable wildlife corridors will be lost.
 - Important areas of landscape and visual amenity will be lost forever.
 - Agent for the landowner - The identified preferred allocation of the Site Lymp_01 (identified in green in the above local plan map extract) is supported.
- LP_Lymp_02 - Land lying north of Clay Lane, Lympstone - Rejected Site**
- I agree this site should be rejected as described.
 - In addition the amount of extra traffic through the centre of Lympstone village would have very dangerous safety implications.
 - The site is unsustainable, outside the BUAB, it's affects would be drastic on the Wotton Brook flood plain problem.
 - Poor access.
 - Site floods.
- LP_Lymp_03 - Lympstone Nurseries - Planning Permission Granted**
- It would ruin this area of the village, also it's on a floodplain.

LP_Lymp_04 - Land to the south of Meadowgate Cottage, Church Road, Lympstone - Rejected Site

- Green wedge, poor access, on a floodplain
 - Additional pressure on very narrow part of road.
- Inappropriate density of housing.
- Extremely poor access as drive along a footpath. Not suitable for development.
 - Very bad access onto a village road, flooding.

LP_Lymp_05 - Land to the south-west of Dawlish Park Terrace, Lympstone - Rejected Site

- I strongly agree with rejection of this site.
- Development of this site would create additional unnecessary traffic in already busy country lanes with the increased risk of accidents, particularly to walkers and cyclists.
- Sustainability doubtful.
- This site could suit some development of smaller cottage style properties, it is not remote and some people prefer living on the outskirts of a village. This site if developed would not impact the landscape, it has good access to the village by road or footpath. This land would not be agricultural land loss.

LP_Lymp_06 - Hollywell Nurseries, Courtlands Lane, Lympstone - Planning Permission Granted

- I strongly agree with rejection of this site.
- I believe the information on which this selection was dismissed as a site for allocation is incorrect. A planning application search on the council's website returned no approved applications for this site. However, I agree with the result that this site has been dismissed for allocation for development!

- This is ridiculous- the road access is very poor with only 2 passing places and a right angle bend; no easy access to bus or train so everyone will drive; no space in the school or GP surgery so will all have to travel to Exmouth.
 - The site is not appropriate for development:
 - way outside built-up area boundary;
 - unsustainable location;
 - in open countryside;
 - in green wedge;
 - not a brown field site ;
 - it is agricultural land and should be cleared of derelict green houses, which have not been used for growing tomatoes since 1995;
 - very narrow lane for access, with poor visibility.
- LP_Lymp_11 - Land off Harefield Road, Lympstone - Rejected Site**
- No comments on this site.
- LP_Lymp_16 - Land off Underhill Close, Lympstone - Planning Permission Granted**
- Agents for landowners - While Site Lymp_16 is consented for one large dwelling with annex accommodation, it is considered the site could easily deliver up to 5 – 6 additional units – this figure being considered reasonable in light of the number of units identified as deliverable on the four preferred allocation sites – and therefore the realignment of the Built-up Area Boundary to include Site Lyp-16 is supported. This would allow additional development to come forward on this site which has been confirmed via appeal as being a suitable location for new development. The progression of the outline and reserved

<p>matters applications on the site demonstrates that the site is fully deliverable.</p> <p>LP_Wood_39 - Rose Cottage, Exmouth Road - Rejected Site</p> <ul style="list-style-type: none"> • No comments <p>LP_Wood_43 - Land near Exmouth Road, Nutwell Road, Lypstone - Rejected Site</p> <ul style="list-style-type: none"> • No comments <p>LP_Wood_44 - Land at Nutwell Road, Lypstone - Rejected Site</p>	
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Development at Local Centres – Woodbury

Draft Plan consultation	
<p>Key issues raised in consultation:</p> <p>General issues</p> <ul style="list-style-type: none"> • The village of Woodbury does not have enough local amenities with only one shop selling limited provisions and infrastructure won't be able to cope. • More houses taking over green spaces will damage wildlife and push local people out of the village. • Objection to development at Woodbury given proximity (within 10km) of the designated Exe Estuary. • Woodbury is already under pressure from traffic travelling through its village to Exeter. 	<p>Officer commentary in response:</p> <p>General issues</p> <ul style="list-style-type: none"> • Woodbury has a range of facilities and services, including five shops, two pubs, a primary school, and a two hourly bus service to Exeter in one direction and Exmouth in the other, that warrants its status as a Local Centre where development is supported that meets local needs and those in the immediate surrounds. This is reflected in the spatial strategy for around 200 dwellings at Woodbury over the Local Plan period. The forthcoming Infrastructure Delivery Plan will highlight key infrastructure issues, including transport, and how they should be addressed to deliver development proposed in the Local Plan. In addition, specific evidence on the transport impacts of the Local Plan is

<ul style="list-style-type: none">• Woodbury Parish Council (WPC) identify infrastructure issues as a major concern, suggesting traffic calming, 20mph speed limits, and suitable pedestrian routes across the parish.• National Highways anticipate growth here to be significantly Exeter facing, creating commuter and leisure trips through M5 Junction 30, and future discussions with National Highways is required on transport assessment and potential mitigation.• The owner of Woodbury Business Park states it is operating successfully and remains consistently full, highlighting a severe undersupply and significant demand for employment land in the area.• Limited bus service from Woodbury means that new residents will have to drive to work. <p>LP_Wood_04 - Land off Globe Hill, Woodbury - <i>Rejected Site</i></p> <ul style="list-style-type: none">• Woodbury Parish Council does not support this site and agrees with EDDCs report.• Object as waste of prime agricultural land.• Access onto Globe Hill will be dangerous.• Developing this site will degrade the historic and rural feel of Woodbury.• This site should join up with 07 and 08 to improve traffic flow onto the main road with potential for a roundabout at the top. <p>LP_Wood_05 – Land at Venmore Farm, Woodbury - <i>Rejected Site</i></p>	<p>also underway. A proportion of the additional housing at Woodbury will be “affordable” which can be ring-fenced to people with local connections.</p> <ul style="list-style-type: none">• The impact of development upon the designated Exe Estuary will be addressed in the Habitats Regulations Assessment that will accompany the Local Plan.• The success of Woodbury Business Park is noted, and demand for employment land is being considered in the Local Plan. <p>LP_Wood_04 - Land off Globe Hill, Woodbury - <i>Rejected Site</i></p> <ul style="list-style-type: none">• Support for not allocating this site is noted. It is Grade 2 agricultural land, and one of the factors for not allocating the site. The historic and rural feel is noted as a medium/high landscape sensitivity, another reason for its non-allocation. Wood_04 and 07 are not proposed for allocation, and there is no justification for the suggested road in any case. <p>LP_Wood_05 – Land at Venmore Farm, Woodbury - <i>Rejected Site</i></p> <ul style="list-style-type: none">• Noted. <p>LP_Wood_07 - Land off Globe Hill, Woodbury - <i>Rejected Site</i></p> <ul style="list-style-type: none">• Support for not allocating the site is noted. Wood_04 and 07 are not proposed for allocation, and there is no justification for the suggested road in any case. <p>LP_Wood_08 - Land to the rear of Orchard House, Globe Hill, Woodbury - <i>Rejected Site</i></p>
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- Woodbury Parish Council does not support this site and agrees with EDDCs report.

LP_Wood_07 - Land off Globe Hill, Woodbury - Rejected Site

- Woodbury Parish Council does not support this site and agrees with EDDCs report.
- This site should join up with 04 and 08 to improve traffic flow onto the main road with potential for a roundabout at the top.

LP_Wood_08 - Land to the rear of Orchard House, Globe Hill, Woodbury - Rejected Site

- Woodbury Parish Council supports this site for allocation as it is within walking distance of the village and school, and development would have to provide traffic enhancement.
- WPC state need to justify building on best and most versatile agricultural land.
- The site promoter supports allocation of this site and states that the assessment process was inconsistent and this site performs as well as preferred sites, for example by referring to agricultural land classification on this site but not others which are equivalent grades.
- Access on to Globe Hill will be dangerous.
- Object due to impact on historic village centre.
- This site should join up with 07 and 08 to improve traffic flow onto the main road with potential for a roundabout at the top.

LP_Wood_09 - Land off Globe Hill, Woodbury - Rejected Site

- Support for not allocating the site is noted. Wood_04 and 07 are not proposed for allocation, and there is no justification for the suggested road in any case.
- Agree this site is in an accessible location, close to the settlement centre and facilities. Access requirements will be considered in more detail through a planning application.
- Do not agree that an inconsistent approach has been taken – the site assessments consider the same set of planning issues for each site, for example agricultural land quality is noted for all sites. Although (the slightly smaller) Wood_08 was assessed due to the latest landowner submission (call for sites 2021), the subsequent representation from the site promoter and submission of a planning application (ref. 23/1258/MOUT) indicates that the entire field, known as Wood_06 in the HELAA, should be assessed for consideration in the Local Plan. On balance and following more detailed site assessment and considering the consultation responses, the adverse landscape impacts are less significant and can be addressed, and the proximity to the settlement centre and local facilities means that the site should be allocated.
- The site assessment notes the impacts upon the historic environment, with the Conservation Area on eastern boundary, concluding a medium impact: no significant effects which cannot be mitigated.

LP_Wood_09 - Land off Globe Hill, Woodbury - Rejected Site

- The general support for this site is noted.

- Woodbury Parish Council supports this site for allocation as it provides an opportunity to enhance the village centre and development would have to provide traffic enhancement.
- WPC state developers would have to overcome heritage and TPO concerns.
- This land currently has very limited amenity value as enclosed by surrounding walls, so support development to help open up this central part of the village.
- Support developing this site as close to existing facilities and could encourage further facilities and benefit the village centre.
- Given there are already houses in between the site and Grade I listed church, this does not seem a relevant factor in considering this site.
- The recent consultation on this site showed a low density, well-designed development retaining important the landscape and heritage aspects of the site.

LP_Wood_10 - Land at Gilbrook, Woodbury - Preferred Allocation

- The Environment Agency advises that there are floodplains and a designated main river along the site edge that should be set aside as green infrastructure, with a buffer of at least 8m from the watercourse, free from built development.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation.

- Adverse heritage impact given location with Conservation Area, impact upon Grade II listed Oakhayes, proximity to Grade I listed church, and entire site covered by TPO.
- The provision of housing in an accessible location close to facilities in the settlement centre and the primary school, and medium landscape sensitivity with a context of built form – these benefits outweigh the negative heritage impact.

LP_Wood_10 - Land at Gilbrook, Woodbury - Preferred Allocation

- The flooding issues on the site edge are noted – this should be addressed through a planning application in designing a scheme. Unsure of the flood risk asset on the site but, again, this can be considered in more detail through a planning application.
- A full HESA has now been produced, which includes consideration of the impact upon nearby listed buildings.
- The site assessment states pedestrian/cycle links into Gilbrook House and/or Beeches Close to the north should be provided, which would connect to the existing settlement.
- The site is Grade 3 agricultural land, so uncertain as to whether it is “best and most versatile” (grade 3a and above).
- Issues relating to the provision of on-site employment are addressed in Strategic Policy 5.
- DCC do not raise any significant issues relating to additional traffic, but state an extension of the 30mph limit will be required to help address traffic issues – these issues will be addressed in more detail at the planning application stage.
- The landscape sensitivity assessment concludes a medium sensitivity for this site.

- Woodbury Parish Council and residents do not support this preferred allocation as it has poor access and connectivity to the village, particularly the distance to the school.
- Woodbury Parish Council due to flooding concerns.
- Woodbury Parish Council due to loss of good agricultural land.
- DCC understand there is a mapped flood risk asset within the allocation that needs to be considered.
- The agent on behalf of the site owners supports the allocation for housing but objects to the requirement for a mixed use scheme to incorporate 0.24ha of employment.
- Support this allocation as logical approach to development.
- Delivery requires pedestrian access across adjoining development and through floodplain, can't provide safe pavement
- Impact on setting of adjacent listed building
- Has not taken account of landscape and elevated views.
- Concern about the impact of additional traffic.

LP_Wood_11 - Land at the rear of Escot Cottages, Broadway, Woodbury - Rejected Site

- Woodbury Parish Council does not support this site as it has poor access, flooding concerns and encroaching into green wedge.

LP_Wood_12 - Land to the east of Higher Venmore Farm, Woodbury - Rejected Site

- Woodbury Parish Council and residents do not support this site and agrees with EDDCs report.

LP_Wood_11 - Land at the rear of Escot Cottages, Broadway, Woodbury - Rejected Site

- Support for rejecting site is noted.

LP_Wood_12 - Land to the east of Higher Venmore Farm, Woodbury - Rejected Site

- Developing this site would have a medium/high landscape sensitivity given prominent location on rising land, largely surrounded by fields. Even focussing development in the northern part would not address this sufficiently.
- There are other, more preferable, sites at Woodbury, and the scale of development on this site in addition would be inconsistent with the spatial strategy.

LP_Wood_13 - Critchards, Woodbury - Rejected Site

- Noted – this site failed the site sifting as below site size threshold to be considered as an allocation.

LP_Wood_14 - Land west of Pound Lane, Woodbury - Rejected Site

- Noted.

LP_Wood_15 - Land east of Pounds Lane, Woodbury - Rejected Site

- Noted – this site failed the site sifting as below site size threshold to be considered as an allocation.

LP_Wood_16 - Land west of Broadway (Phase 2), Woodbury - Preferred Allocation

<ul style="list-style-type: none"> • Bell Cornwell on behalf of landowner urges this site is reconsidered as mixed-use allocation, focussing development in the northern part adjacent to other allocations. • This site could provide alternative access to Woodbury and green areas. <p>LP_Wood_13 - Critchards, Woodbury - Rejected Site</p> <ul style="list-style-type: none"> • Woodbury Parish Council does not support this site and agrees with EDDCs report. <p>LP_Wood_14 - Land west of Pound Lane, Woodbury - Rejected Site</p> <ul style="list-style-type: none"> • Woodbury Parish Council and residents do not support this site and agrees with EDDCs report. <p>LP_Wood_15 - Land east of Pounds Lane, Woodbury - Rejected Site</p> <ul style="list-style-type: none"> • Woodbury Parish Council and residents do not support this site and agrees with EDDCs report. <p>LP_Wood_16 - Land west of Broadway (Phase 2), Woodbury - Preferred Allocation</p> <ul style="list-style-type: none"> • The Environment Agency advises that there are floodplains and a designated main river along the site edge that should be set aside as green infrastructure, with a buffer of at least 8m from the watercourse, free from built development. • Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it is likely to be able to accord with national policy, guidance 	<ul style="list-style-type: none"> • Fluvial and surface water flood risk from the river on the site edge is noted, and this should be addressed in more detail when developing the site. • A HESA has been undertaken which considers the impact upon the conservation area and listed building. • The support, including from the parish council and landowner, is noted. • Landscape impact, including the public right of way and long distance intervisibility, is considered in the Landscape Sensitivity Assessment which concludes medium sensitivity. • Although the land is currently arable (used to grow crops), it is Grade 3 in the strategic agricultural land classification so uncertain as to whether it is “best and most versatile” (grade 3a and above). • DCC have not raised any significant issues relating to traffic impact – these issues will be addressed in more detail at the planning application stage. • As discussed above, Wood_12 is not recommended for allocation due to adverse landscape impact and there are other, more preferable, sites at Woodbury, and the scale of development on this site in addition would be inconsistent with the spatial strategy. <p>LP_Wood_19 – Land on the east side of Parsonage Way, Woodbury - Rejected Site</p>
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<p>and legislation. Particularly with regard to the conservation area and listed building setting</p> <ul style="list-style-type: none"> • Woodbury Parish Council supports this preferred allocation as it is within walking distance of the village and school, would require pedestrian access to village and traffic calming measures. • WPC state the perimeter hedge must be maintained and enhanced, and a footpath constructed along the stream corridor. • DCC state there are known surface water flow routes that abut all of the site boundaries so need to ensure these are managed and not worsened elsewhere within a robust drainage strategy. • The landowner supports the allocation of this site for housing. It is deliverable as a housing site and is well related to the existing built up area. It is well provided with facilities and there is a strong need for a mix of new housing including affordable housing. The technical work supporting the current planning application demonstrates that the development is deliverable. • Support this allocation as logical approach to development. • Would significantly change the landscape and rural character of the village, high impact on AONB due to size and proximity of site. • Negative impact on CA and listed buildings • Long distance intervisibility, site can be seen from other side of Exe estuary • Rural public right of way will be urbanised 	<ul style="list-style-type: none"> • Support for not allocating this site is noted. <p>LP_Wood_20 - Land at Town Lane, Woodbury - Preferred Allocation</p> <ul style="list-style-type: none"> • Landowner support is noted. • Agree that Town Lane is narrow and lacks pavements for most of its length, which would deter walkers and cyclists on the 500m journey to the primary school. The settlement centre is around 400m to the west – there is a short (75m) section along Town Lane with no pavement, but the remaining journey along the B3179 does have a pavement so is likely to be more attractive to pedestrians. • The ordinary watercourse indicated by DCC is not shown on the council’s mapping system. • Surface water flood risk is not located on the site, but does cover a small area in the woodland to the north – flooding issues will be addressed in more detail through a planning application, which will also ensure construction noise and dust is adequately mitigated. • The large trees to the north are noted in the site assessment as being part of the draft Nature Recovery Network, but a minor adverse effect overall. • The pastoral use of the field is noted - it is Grade 3 in the strategic agricultural land classification so uncertain as to whether it is “best and most versatile” (grade 3a and above).
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- Loss of Grade 2 agricultural land which is currently in use to grow crops.
- Concerned about traffic issues and no safe pedestrian crossing point.
- The road from Broadway to the school is unsafe for pedestrians as it is very narrow with limited footpaths.
- This area could be combined with Wood_10 and Wood_12 to achieve multiple benefits.

LP_Wood_19 – Land on the east side of Parsonage Way, Woodbury - *Rejected Site*

- Woodbury Parish Council does not support this site as it has poor access.
- Woodbury Parish Council objects due to potential loss of trees.
- Agree with not allocating site for the reasons given.

LP_Wood_20 - Land at Town Lane, Woodbury - *Preferred Allocation*

- Woodbury Parish Council does not support this preferred allocation as Town Lane has traffic issues, there is a pinch point at the school, and no safe pedestrian access to the village or school.
- DCC state there is an ordinary watercourse that impacts upon this site and opportunities to enhance this should be sought.
- The landowner supports the allocation of this site for housing. It is deliverable as a housing site and is well related to the existing built up area. It is well provided with

- Overall, the site is close to a range of facilities with limited harm to landscape, ecology, historic environment, which make it a suitable site to allocate.

LP_Wood_21 - Land at Knoll Cottage, Woodbury - *Planning Permission Granted*

- None.

LP_Wood_23 - Ford Farm, Woodbury - *Potential ‘Second Best’ Allocation*

- Agree there is a lack of safe pedestrian access. The settlement centre is around 700m to west, but lacking pavement for 80m on the section of the busy B3179 between the site and Knoll Cottage. Primary school is 600m to north, but access along narrow Town Lane which lacks pavements and would deter pedestrians/cyclists.
- A pond and watercourse shown on OS map in north east of site, which could have wildlife value – agree this should be enhanced were the site to be allocated.
- Developing the site would likely mean a medium-high landscape impact is due to semi-rural character of the site.
- The current lack of mains sewage is noted – this issue would need to be addressed through a planning application.

<p>facilities and there is a strong need for a mix of new housing including affordable housing.</p> <ul style="list-style-type: none"> • Town Lane is very narrow to provide access and has no pavement, a traffic survey shows it is busy and cars exceed speed limit. • AONB and intervisibility should be addressed in the assessment. • Construction noise, dust will be unacceptable for nearby existing residents. • Concerned that surface water run-off from development will lead to flooding in Town Lane and elsewhere in the settlement. • There are a number of large trees that provide habitat for a rookery which will be negatively impacted by development. • Local people rent this field to graze horses, sheep etc so oppose developing this site. <p>LP_Wood_21 - Land at Knoll Cottage, Woodbury - Planning Permission Granted</p> <ul style="list-style-type: none"> • No issues raised. <p>LP_Wood_23 - Ford Farm, Woodbury - Potential 'Second Best' Allocation</p> <ul style="list-style-type: none"> • Woodbury Parish Council does not support this second-choice allocation as Town Lane has traffic issues, there is a pinch point at the school, and no safe pedestrian access to the village or school. • DCC state there is an ordinary watercourse that impacts upon this site and opportunities to enhance this should be sought. 	<ul style="list-style-type: none"> • A low risk of surface water flooding along B3179 just beyond southern boundary is noted in the site assessment. <p>LP_Wood_24 - Land north-east of Webbers' Meadow, Castle Lane, Woodbury - Rejected Site</p> <ul style="list-style-type: none"> • The site promoter states that access can be taken from an existing track that links with Webbers Meadow, which could address parish council concerns relating to widening and loss of hedgerow on Castle Lane. • It may be possible to address highway concerns but the site has a high/medium landscape sensitivity and other, more preferable sites at Woodbury mean that allocating this site in addition would lead to a level of development that is too high for the spatial strategy for Woodbury. <p>LP_Wood_33 - The Top Yard, land at Venmore Farm, Woodbury - Rejected Site</p> <ul style="list-style-type: none"> • Although this site benefits from being previously developed land, it failed site sifting as it is not within or adjacent, or otherwise well-related, to Woodbury. <p>LP_Wood_37 - Cricket field of Town Lane, Woodbury - Rejected Site</p> <ul style="list-style-type: none"> • The support for not allocating this site is noted and agreed with. <p>LP_Wood_42 - Webbers Farm, Castle Lane, Woodbury - Rejected Site</p> <ul style="list-style-type: none"> • The support for not allocating this site is noted and agreed with. <p>Omission sites</p>
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- Rural facing site, close to AONB
- Poor relationship to village, facilities are a 10 minute walk and no pavement can be provided.
- Object due to impact on wildlife, including rodents, snakes, birds, pond.
- There is no mains sewage on the current Ford Farm site, so additional development likely to cause sewage and drainage issues.
- Object due to poor access onto the main road.
- 18 houses on this site is too high density and out of keeping with surrounding area.
- See the objections in the planning application 21/0299/OUT refusal in 2021 – nothing has changed since then.
- Development will cause surface water run-off, leading to flooding along Broadway (B3179).

LP_Wood_24 - Land north-east of Webbers' Meadow, Castle Lane, Woodbury - *Rejected Site*

- Woodbury Parish Council does not support this site as it has poor access to facilities and is remote from the village. Castle Lane would require widening and hedgerows would be lost.
- Site promoter objects to non-allocation of the site, which is considered to represent a sensible approach to infilling. The site assessment exercise conducted by EDDC was flawed in relation to highway considerations and landscape impacts could be mitigated by limiting development to up to 70% of the site adjacent to Webbers Meadow.

- The employment site has been assessed as site reference Wood_31 but is not recommended for allocation.
- The field to the west of Wood_10 has been assessed as site reference Wood_46 but is not recommended for allocation.

LP_Wood_33 - The Top Yard, land at Venmore Farm, Woodbury - *Rejected Site*

- Woodbury Parish Council does not support this site for allocation and agrees with EDDCs report.
- Bell Cornwell on behalf of landowner recommend this site is allocated, with several benefits such as previously developed land, close to facilities, small site.
- Developing this site will improve the visual impact as you enter the village and provide important homes.
- This site could be developed alongside Wood_12, turning the difficult bend into a roundabout which would improve safety and pedestrian access.

LP_Wood_37 - Cricket field of Town Lane, Woodbury - *Rejected Site*

- Woodbury Parish Council and residents do not support this site as it is an important and well-used amenity area including the community orchard, cricket field, and dog walk.
- Object to this site because of adverse landscape impact.
- Do not support this site because of poor pedestrian access along Town Lane.

LP_Wood_42 - Webbers Farm, Castle Lane, Woodbury - *Rejected Site*

- Woodbury Parish Council and residents do not support this site as it is an important amenity and would result in a loss of important holiday provision which would be detrimental to local tourism and businesses.

<ul style="list-style-type: none"> WPC object as this site is remote with no pedestrian access to the village. <p>Omission sites</p> <ul style="list-style-type: none"> Bell Cornwell submits an employment site on behalf of the landowner to be allocated to the west of Woodbury Business Park, to extend this successful, established employment site. Landowner suggests field to the west of Wood_10 as available for development, as it has low ecological value and could improve walking/cycling safety by avoiding the right-angled Down Corner. 	
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>Housing Wood_46 – West of Wood_10 – <i>Rejected Site</i> The responses to the question about site Wood_46 not being allocated predominantly express support for this decision. Many respondents cite concerns about infrastructure, particularly regarding road access, traffic, and local services like schools and healthcare. There are also significant worries about the impact on the landscape, loss of green space, and potential flood risks. Some comments highlight the importance of preserving the village character of Woodbury and the need to focus development in more suitable areas. However, a small number of responses indicate support for housing development in the area.</p> <p>Key points raised, in order of frequency:</p>	<p>Officer commentary in response:</p> <p>Housing</p> <p>Wood_46 – West of Wood_10 – <i>Rejected Site</i> The key points raised have all been considered in the Woodbury Site Selection report, which concludes that the site should not be allocated.</p> <p>Employment</p> <p>Wood_31 – Land adjoining Woodbury Business Park – <i>Rejected Site</i> The key points raised have all been considered in the Woodbury Site Selection report, which concludes that the site should not be allocated.</p> <p>Omission site</p>

<ol style="list-style-type: none">1. Infrastructure concerns<ul style="list-style-type: none">○ Inadequate road access and traffic issues○ Pressure on local services (schools, healthcare)○ Sewerage system capacity problems2. Landscape and environmental impact<ul style="list-style-type: none">○ Loss of green space and farmland○ Impact on Devon's natural beauty○ Concerns about biodiversity and habitat loss3. Flood risk and drainage issues<ul style="list-style-type: none">○ Site partially on a flood plain○ Importance of green spaces for flood mitigation4. Preserving village character<ul style="list-style-type: none">○ Concerns about urbanisation and village expansion○ Desire to maintain Woodbury's rural nature5. Support for the decision not to allocate<ul style="list-style-type: none">○ Agreement with the site assessment○ Preference for other, more suitable sites6. Traffic concerns<ul style="list-style-type: none">○ Narrow roads and congestion issues○ Overuse of roads to Exmouth7. Detachment from village centre<ul style="list-style-type: none">○ Lack of safe pedestrian access to village amenities○ Isolation from existing residential areas8. Need for housing development<ul style="list-style-type: none">○ Some support for new housing in the area○ Recognition of potential for suitable plots9. Alternative development suggestions<ul style="list-style-type: none">○ Proposals for apartment blocks instead of houses	<ul style="list-style-type: none">● The land submitted on the north west edge of Woodbury entirely overlaps with Wood_15, 19. Partial overlap with Wood_14, but this submission is a larger site that extends up to the field boundary. 2.17 ha of this site, known as Wood_47, does not overlap existing sites (1.96 ha net developable area) and will be considered in preparing the Publication Draft Local Plan.
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- Suggestions to focus development in other areas of East Devon

10. Concerns about overdevelopment

- Too much development in this part of East Devon
- Cumulative impact of multiple developments

Statutory organisations summary

Devon County Council

State contribution/works would be required to review accessibility to the site, over Broadway Bridge and into the village centre, but generally low traffic speed and local facilities and services help to mitigate vehicle trip generation.

The site lies in an area of known high archaeological potential, so any planning application should be informed by archaeological investigations.

The site could create inert material that should be considered in the layout, design and levels of any development.

Woodbury C of E primary school can facilitate the proposed level of development, but contributions would be required towards secondary education.

Environment Agency

Support rejection of this site due to its proximity to watercourses.

South West Water

Waste Water Treatment Infrastructure- Not expected to require significant upgrades to the network or treatment process.

Waste Water network / Sewer Infrastructure - There is already local concern about the spill performance from the overflow at the treatment works and the foul flows from this site would cause a slight further deterioration.

Water Infrastructure - Not expected to require significant upgrades to the water distribution network.

Employment

**Wood_31 – Land adjoining Woodbury Business Park –
*Rejected Site***

The responses regarding the site Wood_31 not being allocated express a general agreement with the decision, with a few dissenting voices. The key themes that emerge are:

1. Preservation of rural character and agricultural land
 - The site forms part of an open space between Woodbury and Lympstone, and its development would further encroach on the countryside
 - The area is characterised by high-quality agricultural land and landscape sensitivity
2. Concerns about infrastructure and accessibility
 - Poor public transport, cycling, and walking options make the site unsuitable for further expansion
 - Existing road infrastructure is not adequate to support more businesses in the area
3. Environmental and archaeological considerations
 - The expansion of the Coastal Preservation Area means the area should not be developed
4. Existing development and the need for further expansion
 - The industrial park has already expanded considerably into the countryside
 - There is a need for further expansion of the Woodbury Business Park

5. Potential visual impact

- Development of the site would be prominent and obscure long views of the village

6. Flooding concerns

- The road at the lowest point near the substation has a history of flooding, and replacing porous grassland with buildings and hard-standing would exacerbate the problem

Statutory organisations summary

Devon County Council

Highways Agree with comments made in the site assessment summary and conclusion, and for the site being discounted for a future allocation. Historic Environment state no anticipated impact upon any heritage assets with archaeological interest. As such, the Historic Environment Team has no comments to make on this proposed allocation area. Economy are supportive of this site as it is close to existing employment sites and has supporting infrastructure.

Omission site

- Ref. 226 submits land on the north west edge of Woodbury.

Development at Service Villages – General issues

Draft Plan consultation

Key issues raised in consultation:

- Devon County Council note that some Service Villages do not have their own primary school or potential safe walking routes (such as Dunkeswell and Exton) and are therefore potentially an unsustainable location, need to provide additional home to school transport.
- Development at Service Villages should be modest to meet local needs only.
- Do not add second choice sites as these are unsuitable and not well related to the availability of jobs, services and infrastructure.
- Concerns that smaller villages risk being abandoned if you don't provide some infill development which will attract more services in rural areas.
- Additional development in villages around Ottery will put even more pressure on infrastructure (schools, roads, doctors) in the town which cannot cope.
- Proposals seem proportionate to the villages.
- The East Devon AONB team state that settlements where allocations are proposed within the East Devon AONB should be subject to further assessment (either as LVIA or landscape appraisal) to assess the effect the proposals would have on the AONB. This relates to sites identified at Broadhembury, Chardstock, Dunkeswell (NB within the Blackdown Hills

Officer commentary in response:

- The scale of development at each Service Village will be consistent with the Local Plan spatial strategy to allow limited development to meet local needs.
- Whilst Dunkeswell and Exton lack a primary school, they have a reasonable range of other facilities and services that justify their position as Service Villages. The scale of growth will be limited, consistent with the spatial strategy.
- Landscape Sensitivity Assessment has been undertaken for all site allocations, with further work to justify major sites that are within the AONB (now known as National Landscapes).
- A high-level transport assessment for the entire Local Plan is underway.

<p>AONB), Kilmington, Musbury, Newton Poppleford, Otterton, Sidbury and Tipton St John. Policy 26 should be expanded to require that in those settlements additional assessments should be undertaken (using LVIA or landscape appraisals) to consider the effects of the proposals on the AONB.</p> <ul style="list-style-type: none"> • National Highways anticipate the strategic road network can accommodate the level of growth proposed at other Main Centres, Local Centres and Service Villages, but expect a high-level transport assessment for the entire Local Plan to provide evidence. 	
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Development at Service Villages – Beer

Draft Plan consultation

<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The Environment Agency welcome the designation of a coastal change management area. • Several comments that Beer, along with other villages with similar level of population, facilities & services should/could support more development and not just to meet very local need, to support them to grow and thrive and serve surrounding areas and that Beer is more suitable for development due to level of amenities than some other villages in Tier 4. • One respondent expressed surprise that no development is proposed at Beer in the draft plan and considers there are suitable sites but will need high quality design. Another welcomed no development being proposed at Beer. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Noted all comments and would refer back to the Role and Function of Settlements Study that underpins and supports the inclusion of Beer within Tier 4 of the settlement hierarchy, evidencing that it is suitable in principle for some growth. However, it is Officer assessment that the site assessed at this stage (as the only site that passed the Stage 2 sifting) is not suitable for allocation, primarily for reasons of landscape impact. This is set out in detail in the site assessment in the Site Selection report for Beer. • The Neighbourhood Plan allocates a site for housing at Beer that is yet to be developed out and will provide growth for approximately 30 dwellings. A settlement boundary for Beer through the Local Plan will
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<ul style="list-style-type: none"> One comment suggesting Beer could be one location for increasing availability of Park & Ride facilities to further sustainable transport objectives. <p>LP_Beer_01 - Land at South Down Farm, Common, Hill, Beer - Rejected Site</p> <ul style="list-style-type: none"> No comments made specific to this rejected site. <p>Omission sites at Beer</p> <ul style="list-style-type: none"> Landowner representation putting forward land at Quarry Lane, close to the Beer Community Land Trust development at Little Hemphay, for inclusion in the Local Plan for employment, residential or recreational development, with suggested potential for this to include additional car parking to serve the CLT site. 	<p>provide some opportunity to supported development, and further sites could be considered for allocation through any review of the neighbourhood plan.</p> <ul style="list-style-type: none"> The omission site has been assessed as a possible site for allocation for housing and consulted on at the further Regulation 18 consultation (see below).
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>The responses to the question about site Beer_03 not being allocated express general support for this decision. Many respondents cite concerns about the potential impact on the local landscape, heritage assets, ecology, and infrastructure capacity. There are worries that development on this site would be intrusive and exacerbate existing issues like flooding. Some commenters emphasise the need to protect agricultural land and green spaces, especially in light of climate change. A few respondents simply state their approval of the decision without providing additional details.</p> <p>Key points raised, in order of frequency:</p> <ul style="list-style-type: none"> Concerns about landscape, heritage, and ecological impacts Site's proximity to sensitive natural and historic assets Intrusion into the surrounding countryside Infrastructure and flooding issues 	<p>Officer commentary in response:</p> <p>The findings of the site assessment of this site as set out in the Site Selection Report for Beer align closely with the comments made and the general view expressed by respondents not to support this site for allocation. Whilst the statutory consultees responses are noted and do not raise any objections to allocation, these points are not considered to outweigh the identified constraints/assessed impacts, particularly with this site lying within the National Landscape. The site should therefore remain as rejected.</p>

Inadequate roads, schools, and utilities to support development
Exacerbation of existing flooding problems in Beer
Preference for preserving green space and agricultural land
Importance of retaining natural areas for environmental and climate resilience
Need to protect farmland for future food security
General support for not allocating the site
Respondents simply express approval without further explanation

Statutory organisations summary

Devon County Council

There is good visibility access on Quarry Lane with a potential secondary/emergency access onto Bovey Lane. There are several facilities with pavement connections, to help mitigate vehicle trip generation.

Historic Environment Records of prehistoric activity surrounding the site, which should be subject to archaeological assessment prior to development.

The site is located within a Mineral Consultation Area associated with Beer Quarry, although the quarry is over 100m away so no objection.

The sloping nature of the site means potential for the creation of inert material which should be considered in the layout, design and levels of development.

Beer C of E primary school has capacity to facilitate the proposed level of development, but contributions toward secondary education is required.

South West Water

<p>Waste Water Treatment Infrastructure- Not expected to require significant upgrades to the network or treatment process. Waste Water network / Sewer Infrastructure - Not expected to require significant upgrades to the network or treatment process. Water Infrastructure - Likely to need upgrades to the water distribution network.</p>	
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Development at Service Villages – Branscombe

Draft Plan consultation

<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> The Environment Agency welcome the designation of a coastal change management area. Very limited comments specific to Branscombe - one respondent expressed surprise that no development is proposed at Branscombe in the draft plan and considers there are suitable sites but will need high quality design. Another supported no development at Branscombe. <p>LP_Bran_01 - Land to the west of Cott Mead, Branscombe - Rejected Site</p> <ul style="list-style-type: none"> No comments made specific to this rejected site. <p>LP_Bran_02 – Land at Cotte Barton Farm, Branscombe - Rejected Site</p> <ul style="list-style-type: none"> One comment in support of development for affordable housing needed because the village is ‘dying out’ and young people are being forced out due to second homes and the 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> The are no comments that have resulted in changes to the assessment of the sites at Branscombe and the conclusion that none submitted to the Local Plan process are suitable for allocation for housing. However, the support is noted for some limited development to be supported here to enable the village to continue to thrive and provision is made for this through the setting of a settlement boundary within which the principle of development is supported. This is underpinned and evidenced by the Role and Function of Settlements Study which supports Branscombe being a Tier 4 settlement in the settlement hierarchy. Noted that Branscombe parish is a Designated Neighbourhood Area and that the local plan policies also allow for a neighbourhood plan to bring forward sites for housing should the local community wish to do so.
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<p>costs of housing. No other comments and sentiments expressed specific to this rejected site.</p> <p>LP_Bran_03 - Land at Deems, Branscombe - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No sentiment expressed or comments made specific to this rejected site. <p>Omission sites at Branscombe</p> <ul style="list-style-type: none"> • None identified. 	
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Development at Broadhembury

Draft Plan consultation

<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Generally respondents strongly objected to any new development at Broadhembury unless it was purely to provide affordable housing to meet local needs (and this was strongly supported). Many respondents felt that a settlement boundary was not justified and that this would preclude affordable housing which the community was already trying to provide. • The Parish Council did not support the designation of site LP_Brhe_09 nor the new development boundary which includes it. Among other reasons, this would be inconsistent with policy and the NPPF (if it is interpreted in a way which recognises 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • As a Tier 4 settlement with a range of services Broadhembury is required to accommodate some new development, in accordance with the housing and other strategies of the Plan. The Plan's strategy is to identify settlement boundaries at Tier 1-4 settlements and allow appropriate windfall development within them in addition to allocating appropriate sites. There is no justification for not identifying a boundary or allocating a site in Broadhembury. • Affordable housing will be a requirement of any allocation of 10 or more houses. In any case, exceptions schemes will be permitted at Tier 4 settlements where there is a demonstrable unmet need. • There is no justification for allocating/allowing development in the hamlets, away from services, where reliance on private transport will be necessary, as an alternative to allocating a site/s at the tiered settlements.
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<p>the dispersed nature of ED communities), doesn't comply with the LP objectives.</p> <ul style="list-style-type: none">• The PC support the concept of 'service villages' but consider that some development should be allowed in the hamlets elsewhere in the parish in order to support the services, including affordable housing. They consider the hamlets to be a reasonable walking/cycling distance, accessible by electric vehicles and that the school serves this 'sustainable' hinterland.• Overall, respondents were concerned that additional development would detract from the special historic character of the village, would impact upon heritage and natural assets and would exceed the capacity of local roads and infrastructure (especially the sewage pumping station which is over capacity). <p>LP_Brhe_04 - Causeway End, Broadhembury - <i>Rejected Site</i></p> <ul style="list-style-type: none">• No comments were made <p>LP_Brhe_05 - The Old Orchard, Broadhembury - <i>Rejected Site</i></p> <ul style="list-style-type: none">• No comments were made but several 'sentiment' emojis indicated that respondents would be unhappy with development on the site. <p>LP_Brhe_07 - Land south of The Vicarage, Broadhembury - <i>Rejected Site</i></p> <ul style="list-style-type: none">• No comments were made but several 'sentiment' emojis indicated that respondents would be unhappy with development on the site. <p>LP_Brhe_09 - Land opposite Broadhembury Memorial Hall - <i>Potential 'Second Best' Allocation</i></p>	<ul style="list-style-type: none">• Site assessments take account of landscape, heritage and ecological considerations and have been undertaken with qualified expert advice and input so special historic character is not reason in itself for not allowing development, unless demonstrable significant harm will result.• Infrastructure capacity is a consideration and is addressed through other policies in the plan.<ul style="list-style-type: none">• LP_Brhe_04 - Causeway End, Broadhembury - <i>Rejected Site</i><ul style="list-style-type: none">• No comments were made• LP_Brhe_05 - The Old Orchard, Broadhembury - <i>Rejected Site</i><ul style="list-style-type: none">• No comments were made but several 'sentiment' emojis indicated that respondents would be unhappy with development on the site. This supports the Council's position.• LP_Brhe_07 - Land south of The Vicarage, Broadhembury - <i>Rejected Site</i><ul style="list-style-type: none">• No comments were made but several 'sentiment' emojis indicated that respondents would be unhappy with development on the site. This supports the Council's position.• LP_Brhe_09 - Land opposite Broadhembury Memorial Hall - <i>Preferred Allocation</i><ul style="list-style-type: none">• At Draft Plan stage this site was a second best allocation. It is proposed for allocation in the Regulation 19 Plan.
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- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly regarding Grade I LB.
- Devon County Council state that site design should consider any opportunities to enhance the existing watercourse running along the north east boundary, and the ordinary watercourse that crosses the site access.
- Site is not widely supported by the community
- Would support if development was only for affordable housing
- This is the least worst option, close to facilities and village hall, well screened, utilities are nearby
- May set a precedent
- Will block/detract from views of St Andrew's Church
- Unlikely that affordable housing will be provided by landowner
- Need to ensure that housing is affordable to local people
- Won't create an attractive gateway to the village, the approach lane is special in it's own right
- Object to settlement boundary as this will act against community desire to provide affordable housing
- Object to the introduction of a settlement boundary- not justified and doesn't take account of the whole village being a heritage asset
- Road access is dangerous
- Lighting will detract from dark skies

- A heritage assessment has been undertaken and this takes account of the potential impact on nearby heritage assets including the Grade 1 listed Church and the Conservation Area. This concludes that there is potential for moderate impact but this increases with proximity and can be managed through careful design, limiting numbers to a maximum of 10, landscaping, strong natural boundary treatments and a layout and scale that reflects the traditional cottages in the village centre. Some respondents consider that development would detract from views and setting of the Church- functionally the Church was intended to dominate and oversee surrounding houses and it is typical for housing to be viewed in the context of a Church tower so this is not inherently harmful, however housing must be subordinate and an appropriate design.
 - It is agreed that it is desirable for site design to enhance the existing watercourse running along the north east boundary, and the ordinary watercourse that crosses the site access.
- Affordable housing will be required provided the number of houses exceeds the threshold (10)
- Most other comments relate to strategic issues or infrastructure considerations which are covered by other policies of the plan

Omission sites at Broadhembury

- LP_Brhe_02 at Dulford was submitted for 61 houses and was excluded from further consideration as Dulford is not a tier 1-4 settlement and so it did not meet the methodology for consideration for allocation. Distance from services has also precluded it from consideration as a strategic allocation for Gypsy/Traveller pitches.

- May need third party landowner involvement to achieve access
 - Detrimental to the setting of the village
 - Residential garden paraphernalia and domestic outbuildings will detract from rural character
 - Field is high biodiversity/ecology value
 - Field already results in water run off and flooding
 - Houses in Honiton and Cullompton are sufficient to meet need
 - Broadhembury lacks infrastructure needed for new houses (and doesn't want it eg street lighting, pavements, signs)
 - Oil central heating (no mains gas) will not be environmentally friendly
 - Lack of capacity at local school
 - Lack of sewage capacity- regularly overflows
 - Any new development will detract from historic character of village
 - The emerging Government guidance removes the requirement for a minimum amount of housing to be provided in the village
 - The potential site boundary is arbitrary and doesn't follow natural features
- Omission sites at Broadhembury**
- LP_Brhe_02 at Dulford was submitted for 61 houses and was excluded from further consideration as Dulford is not a tier 1-4 settlement and so it did not meet the methodology for consideration for allocation. The owner advises that the site could alternatively be suitable for Gypsy/Traveller pitches should there be a need.

Development at Service Villages – Chardstock

Draft Plan consultation

Key issues raised in consultation:

- The Environment Agency note that the village is in the catchment of the River Axe and that development will need to be nutrient neutral.
- The facilities available in Chardstock have been incorrectly assessed - there is no bus service or pub. The local post office sells bare essentials only.
- The housing allocation for Chardstock would involve building on a green field site which is not climate change friendly or acknowledge the climate emergency.
- The existing village infrastructure struggles to support the present population and vehicle movements – adding another 30 houses will just add to the problem and increase pollution as there is no available public transport.
- Contrary to Neighbourhood Plan (NP) which only identified two affordable homes. Changes must reflect the NP.
- New housing is not likely to be affordable in the honest meaning of the word.

Officer commentary in response:

- It is noted that services and facilities in Chardstock are limited and Officers are aware that the pub has been closed for some time and the shop is small and community run. However, there is not considered to be justification to reassess its position as a named settlement in Tier 4 of the settlement hierarchy based, but recognising it is one of a number of smaller settlements in that tier. The site (Char_04a) has been carefully considered using the agreed Site Selection methodology and for 30 homes is considered to be a modest and proportionate allocation, which may go some way to supporting maintain the services and facilities that do exist, and which are in close proximity/walking distance of the site.
- The housing needs data for the neighbourhood plan is not a deciding factor for the Local Plan strategy, which is informed by more recent evidence and a need to consider housing provision at district level. There may however be opportunities for a revised neighbourhood plan to influence the nature/design of the allocation.
- The proposed allocation is limited to one field with an existing access point and the extent of the need for hedgerow removal is expected to be limited and the scheme will be subject to biodiversity net gain

- Concerning proposed development Chardstock we live off the road into Chardstock at Honeyhill Farm our entrance comes onto the road into the village, between the times of 8.30am to 9.30 am and from 2.45 to 3.30 pm we find it impossible to get out of our lane and out to the main A358 due to the single lane road way, having put up with it for 39 years, we resolved not to go out at these times. On the occasion when we have had Ambulances and other emergency services trying to get to us, and our fellow neighbours, all have experienced life-threatening delays because of the difficulty getting through the lane. We are not opposed to the development subject to widening the narrowest parts of the lane.
- There is an undeniable need for housing especially for East Devon residents when looking for their own homes where they work.
- Would it be possible for as well as making properties affordable there could also be a Covenant to protect them from purchase from outside the area?
- Residents concerned over impact on road safety suggest that the secure infrastructure necessary for any future development must be reviewed and undertaken before any development is planned.
- It is appalling to consider ruining the peace and tranquillity of this beautiful rural village.
- The lives of the mainly older population would be devastated by such disruption to their daily lives by extensive long term building works, not to mention the increase in traffic which would be unsustainable.

- requirements. More remote and sensitive parts of the wider site as put forward to the local plan call for sites are rejected. Only a single field immediately adjacent to existing built development and close to the main village amenities is allocated.
- In terms of highways, the issues reported by local residents are noted and the narrow lanes in/out of this village are recognised as a constraint against greater levels of development at this village, but in terms of the site proposed at Reg 18 (and carried through to Reg 19 stage), the highways authority have advised that access is adequate, and this is for a modest number of homes (30). Increasing the site of the allocation has been considered and rejected.
 - A proportion of affordable housing (under the Government definition) will be required to be included in any scheme for development of this site. Homes will be allocated using the criteria in Devon Home Choice, which includes prioritising those with a local connection in the first instance.
 - Further to work in relation to employment sites for the local plan, the original proposal to include an element of employment use on this allocation has been removed.
 - Construction impacts will be assessed and managed through the future development management process when an application is submitted.

- Consideration should also be given to local wildlife which would be destroyed by the removal of fields and hedgerow which form their habitat.
- LP_Char_01 - Green Lane Farm, Chardstock - *Rejected Site***
- No comments
- LP_Char_03 - Chubbs Yard, Chardstock - *Rejected Site***
- No comments
- LP_Char_04a - Land off Green Land, Chardstock - *Preferred Allocation***
- Developer (Strongvox Ltd) supports the allocation of Char_04 as sustainable and suitable for development – commissioned landscape and design work show that 40 dwellings can be delivered.
 - Developer (Strongvox Ltd) objects to employment land on this site as this will mean larger buildings that cannot respond as well to the landscape context and will reduce housing delivery.
 - This site is within comfortable 20-minute walking distance of a primary school, community hall, convenience store, place of worship, pub, playing fields and bus stop.
 - Access to the village is difficult, by narrow lanes with few passing places. This is particularly so at the start and end of the school day, when parents drive children to/from the school. There is no public transport to/through the village. Nearest is at A358 along a narrow lane with no footpath. Also, there is a lack of amenities within the village, eg pub is permanently closed and the situation of the local shop is precarious.

- I do not feel Chardstock can sustain any further housing developments due to all access roads to the village are single track, already very busy and dangerous to walk along.
- The river Kit is already failing due partly to sewage leaks.
- The bus service for the village runs along the A358 which is a mile from the centre of the village and not safe to walk along.
- Our pub is closed with little hope of it opening soon.
- There is talk about our church become a festival church. Even a housing development could not increase the numbers enough to change attendance figures enough to save this from happening.
- Our village shop is struggling to survive after a community buy out.
- Multiple comments expressed inadequacy of road network to cope with construction phase and development.

LP_Char_04b - Land off Green Land, Chardstock - *Rejected Site*

- Developer (Strongvox Ltd) supports the allocation of Char_04 as sustainable and suitable for development – commissioned landscape and design work show that 40 dwellings can be delivered.
- Developer (Strongvox Ltd) objects to employment land on this site as this will mean larger buildings that cannot respond as well to the landscape context and will reduce housing delivery.
- This site is within comfortable 20-minute walking distance of a primary school, community hall, convenience store, place of worship, pub, playing fields and bus stop.

Omission sites at Chardstock

<ul style="list-style-type: none"> • None identified 	
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation: Ref. 226 submits land on the north west edge of Chardstock.</p>	<p>Officer commentary in response: This site is being considered for inclusion in the Publication Draft Local Plan (known as Char_07)</p>

<p>Development at Service Villages – Clyst St Mary</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation: General</p> <ul style="list-style-type: none"> • Need clarity on how the proposed allocations can support delivery of the Clyst Valley Trail. • Clyst St Mary has seen much development recently without a corresponding increase in facilities. • National Highways anticipate growth here to be significantly Exeter facing, creating commuter and leisure trips through M5 Junction 30, and future discussions with National Highways is required on transport assessment and potential mitigation. <p>LP_Clma_01 - Land off Clyst Valley Road, Clyst St Mary - Planning Permission Granted</p>	<p>Officer commentary in response: General</p> <ul style="list-style-type: none"> • If the Clyst Valley Trail is proposed to travel through or close to the site allocations, a requirement can be included in the policy to ensure its delivery. • Infrastructure requirements are being considered through an Infrastructure Delivery Plan, which will identify changes in facilities necessary to facilitate development proposed in the Local Plan. • Traffic modelling will consider the impact of development at Clyst St Mary and the wider area. Initial work indicates improvements are likely to be required to the Clyst St Mary roundabout (A3052/A376).

<ul style="list-style-type: none"> • No comments <p>LP_Clma_02 - Land at Winslade Park, Clyst St Mary - <i>Planning Permission Granted</i></p> <ul style="list-style-type: none"> • This absorbs greenfield and plantation land. We should first develop brownfield land before moving on to essential land required to bring about sustainable food and promoting biodiversity in the region. <p>LP_Clma_03 - Homefield, Oil Mill Lane, Clyst St Mary - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No comments <p>LP_GH/ED/53 - Land to the north of the A3052 between The Cat & Fiddle and Devon County Showground, Sidmouth Road, Clyst St Mary - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No comments <p>LP_GH/ED/55 - Land to the north of the A3052 between The Cat & Fiddle and Devon County Showground, Sidmouth Road, Clyst St Mary - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No comments <p>LP_GH/ED/56 - Land at Coxes Farm, Sidmouth Road, Clyst St Mary - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No comments 	<p>LP_Clma_01 - Land off Clyst Valley Road, Clyst St Mary - <i>Planning Permission Granted</i> N/A.</p> <p>LP_Clma_02 - Land at Winslade Park, Clyst St Mary - <i>Planning Permission Granted</i></p> <ul style="list-style-type: none"> • Noted, but this site already has planning permission. <p>LP_Sowt_03 - Land north of Sidmouth Road, Clyst St Mary - <i>Preferred Allocation</i></p> <ul style="list-style-type: none"> • Support for allocating this site is noted. <p>LP_Sowt_09 - Bishops Court Lane, Clyst St Mary - <i>Preferred Allocation</i></p> <ul style="list-style-type: none"> • In principle support for the allocation is noted – issues relating to the provision of on-site employment are addressed in Strategic Policy 5. <p>LP_Sowt_11a - Land at Bishops Court Lane, Clyst St Mary - <i>Potential ‘Second Best’ Allocation</i></p> <ul style="list-style-type: none"> • The potential benefits of delivering this site, along with Sowt_03, are noted. However, when considered alongside other, more preferable, sites, the scale of growth would be too high and not consistent with the spatial strategy for Clyst St Mary. The site would be high/medium landscape sensitivity to new development and would mean a loss of Grade 2 agricultural land. <p>Omission sites at Clyst St Mary</p> <ul style="list-style-type: none"> • Option 1 is the preferred location for a new community, rather than Option 3.
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**LP_Sowt_01 - Land at Bishops Court Lane, Clyst St Mary -
*Rejected Site***

- No comments

**LP_Sowt_02 Land south of Bishops Court Lane, Clyst St Mary -
*Rejected Site***

- No comments.

**LP_Sowt_03 - Land north of Sidmouth Road, Clyst St Mary -
*Preferred Allocation***

- Agents for Core Strategic Land Limited (CSL) -
- Fully support the Map extract for Clyst St Mary and in particular the inclusion of the site at Sidmouth Road in Clyst St Mary (Site Sowt_03) as a preferred allocation. This site and the general location is seen as suitable for new housing development.
- The impact of developing this site would be minimal as it is already bounded on two sides by existing development, housing to the immediate west and The Show Ground to the immediate east. The existing boundary to the immediate east of the site, namely the Show Ground, prevents unfettered urban sprawl, therefore this is not an issue with development of this site.
- This site is very suitable for housing, being a logical extension of the village, surrounded on two sides by existing development to the immediate south and west and up to a clearly defined and defensible boundary in the form of The Show Ground to the east. Therefore, this sensible

extension to Clyst St Mary at Site Sowt_03 does not represent ribbon development but sensible rounding off.

LP_Sowt_04 - Land at junction of Sidmouth Road and Oil Mill Lane, Clyst St Mary - *Rejected Site*

- No comments

LP_Sowt_05 - Land at junction of Sidmouth Road and Oil Mill Lane, Clyst St Mary - *Rejected Site*

- No comments

LP_Sowt_06 - Langdon's Business Park and occupied units - *Rejected Site*

- No comments

LP_Sowt_07 - Denbowe, Clyst St Mary - *Rejected Site*

- No comments

LP_Sowt_09 - Bishops Court Lane, Clyst St Mary - *Preferred Allocation*

- 3West Developments Ltd supports the identification of Clyst St Mary as a Tier 4 settlement and the allocation of 35 dwellings. However, the company objects to the requirement for 0.14ha of employment land, which is

unjustified and poorly evidenced. The site is in one ownership and can be delivered quickly.

LP_Sowt_11a - Land at Bishops Court Lane, Clyst St Mary - Potential 'Second Best' Allocation

- Savills Planning on behalf of the landowner of SOWT_11a site, suggested that SOWT_11a is a "Second Choice" site but can be combined with SOWT 03 to deliver a range of potential benefits, such as accommodate the Clyst Valley Trail through both sites and the opportunity to consider a road link from the Sidmouth Road through both sites. Combining the two sites can bring forward and deliver a number of infrastructure and other public benefits which are of wider significance and can only be achieved by combining these two sites.

LP_Sowt_11b - Land at Bishops Court Lane, Clyst St Mary - Rejected Site

- No comments

Omission sites at Clyst St Mary

- A landowner (Mr and Mrs Murray) support Option 3 subject to the inclusion of their land of 2.1 acres/22 dwellings at Shepherds Farm (map attached to Commonplace response).

<p>Commentary on policy redrafting for the Publication Plan</p>
<ul style="list-style-type: none"> Following much discussion, it has been agreed that Clyst St Mary will allocate sites for development through its emerging Neighbourhood Plan, rather than the Local Plan. This is because it reflects local aspirations, the advanced stage of Neighbourhood Plan preparation, and the positive approach to delivering development in the Neighbourhood Plan that will see higher amounts of housing allocated than the Local Plan. Therefore, the allocation of sites at Clyst St Mary falls outside the scope of the Local Plan.

<p>Development at Service Villages – Dunkeswell</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> Dunkeswell Parish Council - It is the opinion of the Council that Dunkeswell does not need any more larger development sites as is proposed in the Draft Local Plan. Dunkeswell has had what it considers, reasonable growth since the last Local Plan review, this includes the Pump Fields properties and also the 9 properties at Land North of Louis Way (below MUGA/Allotments). Rather they would wish to see "organic" growth of individual properties, as and where required, in keeping with this rural area. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> As a Tier 4 settlement with a range of services Dunkeswell is required to accommodate some new development, in accordance with the housing and other strategies of the Plan. The Plan's strategy is to identify settlement boundaries at Tier 1-4 settlements and allow appropriate windfall development within them in addition to allocating appropriate sites. There is no justification for not identifying a boundary or allocating a site in Dunkeswell. There is no justification for allocating/allowing development in the non-tiered settlements, away from services, where reliance on private transport will be necessary, as an alternative to allocating a site/s at the tiered settlements.

- The Sewerage System - The system is old with small pipework and is easily overwhelmed in places currently, adding more homes would only add to this issue.
- Dunkeswell does have Charity run Pre-School, but does not have Primary or Secondary School and if it did, the likelihood could be that other smaller schools in the local area (ie Broadhembury/Upottery) may close, in addition there would transport to and from school to consider and would this fit well with green targets?
- Bus Services - Services have been cut in recent years and as far as we are aware there are no plans to improve service levels in Dunkeswell. Currently there is a Mon – Sat service and no service on Sunday. There is no direct or timetabled bus service to serve those working at the industrial estate.
- Employment - Residents of Dunkeswell do not necessarily work on the industrial estate, and it is the opinion of the Council that the majority of residents actually work elsewhere, travelling by car to other towns, with people, not resident in Dunkeswell travelling here (mainly by car) to work.
- Other Services - Other local services could be unable to offer or cope with a large increase in resident numbers.
- The Council has noted that in some local areas, housing has been identified by Parish Councils and Residents as being required/appropriate (ie Upottery) and yet this has been declined. Is it not better to have housing where it required and wanted? Lessening the burden in other areas where it is not wanted or required?
- Could the mobile homes already in place at Dunkeswell at Hornbeam Park be considered instead of building a new

- Site assessments take account of landscape, heritage and ecological considerations and have been undertaken with qualified expert advice and input.
- Infrastructure capacity is a consideration and is addressed through other policies in the plan.
- Dunkeswell has a significant amount of local employment so there is far greater potential for settlement self containment and opportunity for new residents to work locally than for many other settlements.
- Whilst the existing holiday lodges could potentially be considered for full time occupation this would be contrary to the restrictive planning conditions imposed when they were granted permission. It would also remove them from the holiday accommodation stock (reducing the economic tourism benefits to the local economy) and they have not been submitted through the HELAA.

LP_Dunk_01 - Land at Hutshayes Farm, Dunkeswell - *Rejected Site*

- This site has been rejected due to its significant landscape impact, proximity to heritage assets and priority habitat.
- **LP_Dunk_02 - Land east of Manleys Farm, Dunkeswell - *Rejected Site***
- ***The comments relating to this site were also submitted to site LP_Dunk_05. As that site is proposed for allocation, the points are addressed below.***
- **LP_Dunk_04 - Land north of Louis Way, Dunkeswell - *Rejected Site***
- No comments

development? Could the Holiday Lodges be granted residential status to allow people to downsize thus providing homes in established areas to become available for those wanting to upsize their home.

LP_Dunk_01 - Land at Hutshayes Farm, Dunkeswell - Rejected Site

- The site was considered to be acceptable and appropriate in the first round working draft local plan in which it was allocated for approximately 53 homes. The Council are requested to reconsider their conclusion to not allocate the site and reallocate the site for housing development of approximately 53 homes.
- The land is on a slope and has a high elevation above Abbey Road, this is not ideal for getting in and out of the site. One side has quite a sheer drop and there have been small landslides previously. The infrastructure of Dunkeswell will not cope with more houses as it does not cope with the ones we currently have.

LP_Dunk_02 - Land east of Manleys Farm, Dunkeswell - Rejected Site

The Parish Council refute suggestions that the site proposed by EDDC for 43 new homes and 0.17 hectare of employment on land at Brookfield's, Dunkeswell (old Football Field), is a sustainable location with good transport links on the following grounds:

- Roads and Transport - To access Dunkeswell from the Honiton or Hemyock/Wellington direction is by using lanes, that currently are not adequate. Maintenance on these roads is sporadic at best and

- **LP_Dunk_05 – Broomfields, Dunkeswell - Preferred Allocation**
- It is acknowledged that the roads leading to Dunkeswell are rural, however DCC Highways are satisfied that this level of development can be satisfactorily accommodated. If possible, the access will be taken from the main road, if this not possible then the adjoining farm access can be upgraded.
- A continuous pavement cannot be provided from this site, through Dunkeswell to the employment site, however it may be possible to construct a footpath/cyclepath through the boundary into the Highfield Estate so that those facilities can be accessed on foot.
- The northern boundary, leading into the Highfield Estate is covered by a row of protected trees. These would need to be accommodated in any housing design and so a buffer is likely to remain undevelopable. In addition, if a footpath is created at this point it would need to ensure that no harm to any trees occurs.

Omission sites at Dunkeswell

- None identified

regularly potholes and road surfaces are eroded into the road surfaces causing dangerous driving conditions, narrow lanes and large freight cause issues and also flooding creates issues in heavy rainfall with run off water on the hills collecting at the bottom of the hills.

- Pavements - Pavements are patchy or non-existent in places, along the main road through Dunkeswell, towards the airfield continuing like this until well into the Old Village. This lack of pavements combined with the high traffic flows (including heavy goods vehicles) at certain times of the day do not make walking/cycling a safe experience. In response to village requests the Parish Council has been working with the Police to establish a Speed Watch group. Police guidance for Health and Safety, since lockdown, has been amended recently resulting in every proposed SpeedWatch site being rejected, as the Police say they fail to offer protected safe areas for volunteers or Police Officers.
- Interactive roadside speed signs have been investigated and Highways have rejected these saying there is no place suitable as the main through road does not allow enough forward vision for the signs to be sited safely.
- Trees - many trees in Dunkeswell are TPO'd, at Jenwood Road (backing onto the proposed preferred site), trees are TPO'd and already cause owners and DPC enormous problems, with residents not being allowed to remove and

<p>replace them and the constant concerns of trees falling in high winds and shading properties.</p> <ul style="list-style-type: none">• The land is on a slope and has a high elevation about the main road, this is not ideal for houses. The infrastructure of Dunkeswell will not cope with more houses as it does not cope with the ones we currently have. <p>LP_Dunk_04 - Land north of Louis Way, Dunkeswell - <i>Rejected Site</i></p> <ul style="list-style-type: none">• No comments <p>LP_Dunk_05 – Broomfields, Dunkeswell - <i>Preferred Allocation</i></p> <ul style="list-style-type: none">• The above issues (Dunk_02) would be doubled by building on the Broomfield site on the Highfield Estate side and exacerbate an already existing issue.• Access to the proposed development - The Council agree unanimously that the access to Broomfield's is very narrow and probably doesn't currently meet the standards. <p>Omission sites at Dunkeswell</p> <ul style="list-style-type: none">• None identified	
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Development at Service Villages – East Budleigh

Draft Plan consultation	
<p>Key issues raised in consultation:</p> <p>General Issues</p> <ul style="list-style-type: none"> • None identified <p>LP_Ebud_01 - Land off Frogmore Road, East Budleigh - Rejected Site</p> <ul style="list-style-type: none"> • Agree with EDDC site assessment – outside boundary so unacceptable. • Unacceptable access. <p>LP_Ebud_02 - Ashfield, Vicarage Road - New Site - not assessed</p> <ul style="list-style-type: none"> • Respondents were concerned that development would harm the listed building and its setting. • Outside boundary and marked as green space in neighbourhood plan and should remain as such. • Access problems and no safe footway to village. <p>LP_Ebud_03 - Land on the south side of Russell Drive - New Site - not assessed</p> <ul style="list-style-type: none"> • Would prefer this site to Ebud_02. • A couple of respondents felt that the site should be excluded from settlement boundary due to highway safety issues. • Grade 1 agricultural land. • Planning permission has been refused in the past. • Could only be developed if home on Russell Drive demolished. <p>Omission sites at East Budleigh</p> <ul style="list-style-type: none"> • None identified 	<p>LP_Ebud_01 - Land off Frogmore Road</p> <ul style="list-style-type: none"> • This site was not previously proposed for development but is now allocated for 22 dwellings. • The site is considered to constitute major development in the context of the East Devon National Landscape for which there are exceptional circumstances. • No other sites are proposed for allocation.

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Development at Service Villages – Exton

Draft Plan consultation

<p>Key issues raised in consultation: General</p> <ul style="list-style-type: none"> • Proposed sites will impinge on the Green Wedge and adversely affect the rural landscape. • Proposals are contrary to the Neighbourhood Plan. • Sites will add to traffic on the already congested A376, particularly alongside other sites at Exmouth and Lymptone, with no suggested mitigation. • National Highways anticipate growth here to be significantly Exeter facing, creating commuter and leisure trips through M5 Junction 30, and future discussions with National Highways is required on transport assessment and potential mitigation. • Exton is not sustainable as it has few services, facilities and jobs compared to Ebford/Clyst St George. <p>LP_Wood_01 - Field 4583, Exmouth Road, Exton - Preferred Allocation</p> <ul style="list-style-type: none"> • Woodbury PC support this preferred allocation. <p>LP_Wood_27 - Marandor, Exmouth Road, Exton - Rejected Site</p>	<p>Officer commentary in response: General</p> <ul style="list-style-type: none"> • A Landscape Sensitivity Assessment has been undertaken for all three sites, and adverse landscape impact is a key reason why Wood_41 is rejected. Of the three sites, only Wood_41 is covered by the Green Wedge. • Woodbury Neighbourhood Plan (which includes Exton) has not progressed to its first consultation stage as yet, so no conflict with the NP. • Agree that the A376 suffers from traffic congestion – traffic modelling is underway to assess the impact and recommend mitigation measures, including at the M5 junction 30. • Exton does not have a primary school like Clyst St George, but apart from that it has more facilities including a shop, pub, village hall, and children’s play area. Exton has excellent sustainable travel links, with a 20 minute bus service to Exeter/Exmouth, a train station, and walking/cycling links along the Exe Estuary Trail.
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- No comments.

LP_Wood_28 - Land to the north and east of Exton Farm, Exton - Preferred Allocation

- The Environment Agency advises that the southern boundary fringes the Woodbury Brook main river and state that this area should be set aside for green infrastructure with a buffer of at least 8m from the watercourse, free from built development. There has been previous flooding on record. Development may, therefore, provide an opportunity for floodplain improvements to reduce flood risk to the community downstream.
- Devon County Council note there is a long history of flooding on the adjacent Exmouth Road and downstream Station Road, as well as along Mill Lane and the southern boundary of the site – therefore a robust drainage strategy that seeks improvements should be considered.
- Woodbury Parish Council support this site only if the critical flooding issues on Mill Lane are addressed prior to development occurring.
- The landowner supports the allocation of this site for housing. It will help support the vitality of the settlement and provide a source of rural housing for local residents, including affordable, and diversify supply.
- Flooding will make this site inaccessible.

LP_Wood_01 - Field 4583, Exmouth Road, Exton - Preferred Allocation
Support noted.

LP_Wood_28 - Land to the north and east of Exton Farm, Exton - Preferred Allocation

- The flooding issues on the boundary of the site are noted in the site assessment. Both this, and foul drainage issues, will need to be addressed through a planning application.
- The support of the landowner is noted.

LP_Wood_41 - Land adjacent to the A376 - Rejected Site

- The issues objecting to this site are noted and agreed with.

<ul style="list-style-type: none"> Developing this site will lead to sewage outfall. <p>LP_Wood_41 - Land adjacent to the A376 - <i>Rejected Site</i></p> <ul style="list-style-type: none"> Woodbury Parish Council do not support this site - it is an important Green Wedge and is in the Coastal Protection Area. Agree that this site is too prominent, it is Green Wedge and development would adversely affect the character of the village. Agricultural land comments are correct but the same can be said about many sites in the area. Good transport links. Object to developing this site as it is a wildlife corridor. Local infrastructure cannot cope. <p>Omission sites at Exton</p> <ul style="list-style-type: none"> None identified. 	

<p>Development at Service Villages – Feniton</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p>	<p>Officer commentary in response:</p>

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| <ul style="list-style-type: none">• Devon County Council (DCC) note all allocations are within the Feniton Critical Drainage Area, which means this catchment needs to be protected from development pressures.• DCC state the SUDS hierarchy should be applied, all off-site surface water discharges from development should mimic “greenfield” performance – see CIRIA SUDS manual and LLFA guidance.• A petition was received, objecting to the inclusion of all/any of the amber second choice sites due to a lack of facilities and infrastructure, additional car journeys on inadequate country lanes, exacerbation of existing flooding, issues of inconvenience and safety with the level crossing and loss of open countryside, agricultural land and wildlife habitat. Brownfield sites should be developed. Agree that the red ‘rejected’ sites should not be developed. Support 42 houses on the preferred site at the former Burlands Mead nursey.• There was more general public concern around flooding issues and the ability of the village to accommodate extra development without worsening flooding matters (recent and planned flood alleviation measures were cited as inadequate.• Concern was raised that the train service is poor and many residents are car dependent with few actually using the train. Though it was suggested that roads to the village are poor.• Concern was raised that there are limited employment opportunities at the village.• Reasons for favouring development at Feniton included – the presence of a primary school, village hall, shop, recreation facilities, and proximity to Exeter. | <ul style="list-style-type: none">• The Critical Drainage Area concerns are noted and will need to inform allocations and specifically planning applications and development schemes that may come forward.• SUDS and other flooding concerns have been addressed through flooding assessment work and will be picked up through flooding specific plan policy.• General concerns raised around suitability of Feniton for development are noted. Such concerns (if or where valid) can however be raised against many locations but the need to accommodate development exists.• Flooding concerns, in general are noted. There are, however, flood protection measures being implemented at the village.• Limitations of public transport at Feniton is noted as are limited employment opportunities at the village.• It is noted, however, that the village does has a range of some facilities (though appreciated some suggest that these are too limited and under pressure).• It is noted that large scale development (more so very large scale) could change the nature of Feniton.• Reference to the past super inquiry is noted, but this should not determine current policy approaches.• It is recognised that the railway crossing is a factor that may impact on potential development. But we would expect Network Rail to comment if there are specific concerns.• The comparative lack of constraints at Feniton, as referenced in representation, is noted. |
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- The capacity of facilities to accommodate growth was challenged and it was highlighted that the facilities that do exist are limited in number.
- A respondent advised that the allocation of a single site in Feniton risks housing delivery as it may have a lower yield or not come forward at all.
- Payhembury PC – Concerns over the scale of proposed development at Feniton including; impact on already stretched local infrastructure including facilities (school places, doctors, etc); impact of increased traffic on local, often narrow, roads; pedestrian and cyclist safety.
- Concern was raised that large scale development would completely change the character of the village.
- A number of respondents referred to the past ‘super Inquiry’ from 2014 where and Inspector rejected to larger scale development proposals, but accepted a smaller one.
- It was highlighted that the plan strategy places Feniton in Tier 4 where only modest development is proposed.
- Numerous respondents commented that the roads are unsuitable for additional traffic, especially the single track lanes around the village.
- A lack of infrastructure was a common concern, with difficulty accessing dr’s, dentists, healthcare and with sewage capacity.
- Railway crossing is the only crossing on a crossroads in England, and barriers are controlled in Basingstoke. Traffic congestion onto Ottery Road is already severe at times and additional traffic will worsen the danger.

<ul style="list-style-type: none"> • Flood alleviation scheme was calculated based on existing houses, it won't have capacity for the allocations (especially as some allocations develop land needed for alleviation). • Insufficient sewage capacity for any extra houses. <p>Many of the above matters were raised in respect of potential individual site option choices (below) and are not repeated again in the individual site assessments, unless a specific site relevant factor is highlighted.</p> <p>There were, however, also (limited) representations in favour of development at Feniton:</p> <ul style="list-style-type: none"> • Agents for Bloor Homes advised: Feniton represents an unconstrained area. Indeed, it is strategically well placed with few environmental constraints, located outside the Area of Outstanding Natural Beauty [AONB] and Coastal Preservation Area with relatively strong sustainability credentials including the railway station and a reasonable provision of facilities and services including primary school, shops and a pub. • A respondent commented that Feniton is sustainable, with a range of facilities and good public transport, more housing sites should be identified. 	
<p>LP_Feni_01 - Land at Feniton forming park of Sherwood Farm - <i>Potential 'Second Best' Allocation</i></p> <ul style="list-style-type: none"> • Objection to site Feni_01 as a development choice were raised on the grounds of: <ul style="list-style-type: none"> ○ being agricultural land; ○ relevance to flood prevention; ○ Site and adjacent lane are prone to flooding; 	<ul style="list-style-type: none"> • The detailed specific concerns highlighted in respect of this site are noted, though they are not unique to this site or to Feniton. • It is not considered that site development would cause settlement merger. • The comment about being the right side of the level crossing is noted.

<ul style="list-style-type: none"> ○ wildlife interest; ○ Being outside of the existing Built-up Area Boundary for the village; ○ Would merge Feniton into the hamlet of Colesworthy <ul style="list-style-type: none"> ● Issues in favour of the site included: <ul style="list-style-type: none"> ○ The right side of the level crossing to get to the A30 highway. 	
<p>LP_Feni_03 - Land at Long Park Farm, Feniton - <i>Rejected Site</i></p> <ul style="list-style-type: none"> ● Objection to site Feni_03 as a development choice were raised on the grounds of: <ul style="list-style-type: none"> ○ Loss of agricultural land; ○ DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area. 	<ul style="list-style-type: none"> ● The detailed specific concerns highlighted in respect of this site are noted, though they are not unique to this site or to Feniton. ● The comments of Devon County Council from a mineral’s perspective are noted. However, finer grained assessment may show they could be overcome. ● Note there is site overlaps of Feni_03, Feni_12 and Feni_13.
<p>LP_Feni_04 - Land off Ottery Road, Feniton - <i>Rejected Site</i></p> <ul style="list-style-type: none"> ● Objection to site Feni_04 as a development choice were raised on the grounds of: <ul style="list-style-type: none"> ○ Highway access to the site is poor and adjacent road is congested at key points in time and there are narrow points and congestion at the rail crossing; ○ Lack of pedestrian access alongside the site; 	<ul style="list-style-type: none"> ● The detailed specific concerns highlighted in respect of this site are noted, though they are not unique to this site or to Feniton. ● Pedestrian access matters are noted though site development could add highway access. ● The comments of Devon County Council from a mineral’s perspective are noted. However, finer grained assessment may show they could be overcome, as noted in the agents representation. ● Proximity of the site to the A30 is noted as are the advised of attributes set out by promoters of the site.

- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.

Issues in favour of the site included:

- A respondent advised: The only advantage of this site is that of all the sites in Feniton it is closest to the A30 where most traffic will inevitably head.
- Agents for Bloor Homes advised that:
 - Strategic Policy 26 is appropriate in terms of proposing growth at Feniton;
 - the proposed site allocation at Feniton for 42 homes would be insufficient to meet development needs for the village for the plan period;
 - The site is well located to accommodate development with low levels of constraint/sensitivity;
 - The site has good public transport connections;
 - There are lower levels of landscape sensitivity at the site;
 - The site is will aid delivery of new market and affordable housing
 - The site will help delivering local flood mitigation -
 - The site will provide publicly accessible open spaces

<ul style="list-style-type: none"> ○ The Site will be designed to achieve a biodiversity net gain. ● Agents for Bloor Homes (advise they) have submitted a Mineral Resource Assessment [MRA] (prepared by Wardell Armstrong, dated September 2022) to the Council following the Call for Sites consultation. The report concludes that due to the small quantity of the safeguarded mineral on this site, it is highly unlikely that the mineral would ever be suitable for, or subject to, commercial extraction either now or in the future. In addition, the proposed development will not prejudice the future working of the safeguarded mineral resource to the southwest of the site. The site therefore meets the requirements of adopted mineral safeguarding policy “Policy M2: Mineral Safeguarding Areas”. They object to the Council’s conclusions that Site meets the definition of ‘unachievable’. 	
<p>LP_Feni_05 - Land and buildings at Burland Mead, Feniton - Preferred Allocation</p> <ul style="list-style-type: none"> ● This site is proposed as an allocation and received more comments in favour of development than other site options in the village. ● Objection to site Feni_04 as a development choice were raised on the grounds of: <ul style="list-style-type: none"> ○ Existing problems of foul and surface water drainage may be worsened by development of this site; 	<ul style="list-style-type: none"> ● The favourable comments about the site and suitability for development are noted. ● Concerns around drainage and sewage are noted, though if allocated/developed technical solutions would be expected at planning application stage. ● Retention of trees where possible would be sought. ● Capacity for around 42 dwellings is seen as reasonable. ● Run down nature of the site is noted in respect of development suitability.

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| <ul style="list-style-type: none">○ The removal of any trees from this sight will impact on the carbon footprint of the village and ha a detrimental effect on wild life that have had 30 years to make this their home. Maybe some endangered species live here○ Question whether this site is capable of accommodating 42 dwellings given the site size and nearby constraints● Issues in favour of the site included:<ul style="list-style-type: none">○ A respondent advises: Most suitable site for development to satisfy the housing requirements of the village. Ideal, central location with good access. Unused (brownfield) site.○ Development of this site could offer opportunities to improve this part of the village the sites has lain derelict for some time.○ It was suggested: A new over 55's development would be great and might encourage older residents to move and free up family housing stock in the village.○ This site is closer to the A30 so the impact on the village of additional traffic and extra car journeys could be somewhat less than other sites.○ The site is seen to fit within village boundaries and make use of vacant land. | <ul style="list-style-type: none">● It is noted that the site relates better to the existing built form of the village than other site options. |
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<p>LP_Feni_06 - FPFA Club, Station Road, Feniton - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Objection to site Feni_06 as a development choice were raised on the grounds of: <ul style="list-style-type: none"> ○ Loss of sports grounds and community facilities in the village with no other better locations for such provision 	<ul style="list-style-type: none"> • The presence of the sports grounds and community facilities at the site and their importance for the community is noted.
<p>LP_Feni_07 - Lyndale, Feniton - Potential 'Second Best' Allocation</p> <ul style="list-style-type: none"> • Objection to site Feni_07 as a development choice were raised on the grounds of: <ul style="list-style-type: none"> ○ DCC state there appears to be significant flowpaths running through or adjacent to this site which cause flooding to property in Feniton, so consider opportunities to reduce peak runoff. ○ EDDC appear to have forgotten that planning permission was granted some years ago to site the attenuation pond in this field, being part of phase4 of the very important and long overdue Feniton Flood alleviation scheme. ○ Traffic from this site would exit the village from north of the railway line. It is also some distance away from access to the A30. Traffic already backs up through the village and to the north when the level crossing barriers are down. ○ Increased risk of flash flooding in Station Road, as concreting over this area will reduce the ability of the ground to absorb run off from the higher ground behind. 	<ul style="list-style-type: none"> • Flooding concerns highlighted by the County Council are noted. • It is recognised that the site contains attenuation ponds and these place constraints on scope for development. • Traffic concerns are noted. • The potential for the site to (partially) fill part of the gap between old and new Feniton is noted, though in many cases settlement coalescence is seen as a negative.

<ul style="list-style-type: none"> ○ Access onto the thin lane, which is already difficult and dangerous for pedestrians, cyclists and cars, would be awkward and would increase traffic near the primary school which is already very busy. <p>Issues in favour of the site included:</p> <ul style="list-style-type: none"> ○ The natural & logical choice if a Second Best site has to be developed, as it would partially blend Old Feniton village with new Feniton. Level site with reasonable, safe access. 	
<p>LP_Feni_08 - Land south-east of Beechwood - <i>Potential 'Second Best' Allocation</i></p> <ul style="list-style-type: none"> • Objection to site Feni_08 as a development choice were raised on the grounds of: <ul style="list-style-type: none"> ○ Too close to Old Feniton to the point where old and new Feniton will almost join and will spoil the picturesque land surrounding old Feniton; ○ This site is impractical for access by vehicles approaching from the old village from Green Lane or heading towards the old village. Developing the site will cause substantial and constant traffic bottle necks along this part of Green Lane. ○ It was a site rejected at the Feniton super appeal. • Issues in favour of the site included: <ul style="list-style-type: none"> ○ Agent submits this land plus land to the south in support of response that Feniton should have a greater level of development – entire site could accommodate around 95 dwellings. 	<ul style="list-style-type: none"> • Proximity to old Feniton is noted, though site development would account for only a small narrowing of the gap and there is not visual connectivity between the site and old village. • Road access has been accessed as acceptable. • The rejection at appeal is noted but this is now a number of years ago. • Agent observations promoting the site are noted, including in respect of issues around need for development and site suitability/lack of constraints.

- This site is within comfortable 20-minute walking distance of public transport including bus stops and the train station providing connections to Exeter and beyond.
- The bulk of this site lies outside the built up area boundary for Feniton; however a small section lies within it. Small scale development on this small section only may be achievable.
- And Greenslade Taylor Hunt as agents for the prospective developer advise:
 - The plan is not consistent with national policy in respect of not allowing villages to thrive and grow (cross references to Policy 1);
 - All sustainable settlements should help deliver housing growth (this cross references to Policy 2).
 - Allocation for housing at Feniton and settlements under Policy 2 does not reflect local needs. There should be an overarching methodology used and applied to establish need, or a set figure for housing growth should be established.
 - The site lies outside of protected landscapes;
 - There are no nearby wildlife designated assets;
 - The land does not present any obvious physical or planning constraints that would limit its development.
 - Land falls in full within Flood Zone 1, the lowest category of risk from flooding. There is ample space on site to attenuate surface water on site 14 | P a g e and connect into the upgraded systems to provide a betterment.
 - There is no evidence of contamination;

<ul style="list-style-type: none"> ○ A range of housing types could be accommodated; ○ Development would be viable. 	
<p>LP_Feni_09 & 11 and LP_GH/ED/38 - Land at Sherwood Cross - 09 & 11 - Potential 'Second Best' Allocation / GH/ED/38 - Rejected Site</p> <ul style="list-style-type: none"> • Objection to sites Feni_09&11 and LP_GH/ED/38 as a development choice were raised on the grounds of: <ul style="list-style-type: none"> ○ DCC state there appears to be significant flowpaths running through or adjacent to this site which cause flooding to property in Feniton, so consider opportunities to reduce peak runoff. ○ The road bisecting 09 and 11 is a narrow country road which already struggles to properly support existing traffic levels, let alone the additional traffic development here would bring. ○ The site contains a ridge to the north which would make housing more visible. ○ Colestocks Road, from which access to the site(s) would be gained, runs north/ south from Feniton to Colestocks. There are numerous pinch points along this road which do not allow two cars to pass. ○ Traffic congestion would also increase travelling south from these sites, causing more stationary traffic back up from the level crossing. ○ The field on which site Feni 11 is proposed currently absorbs significant amounts of run off water from Charlton Hill and Cheriton Hill. Development would exacerbate flooding problems. ○ The roads around this site flood from surface runoff. 	<p>Note that these three sites are commented on together though they are overlapping variations with differing boundaries, Feni_11 being the smallest and GH/ED/38 the largest.</p> <ul style="list-style-type: none"> • Water concerns highlighted by Devon County Council are noted as are woder flooding matters raised. • Highway concerns are noted but not deemed to be of sufficient concern to warrant not allocating. With respect to the level crossing we would look to Network Rail and the County Council in respect of raising concerns. • The ridgeline through the site is noted and development could cause adverse landscape impacts. Though mitigation and planting matters hioghlighted by the promoter are noted. • Locational observations raised in support of the site are noted, though for GH/ED/38 there are direct heritage impact concerns.

- These sites are all north of the railway line. They are also the furthest away from the A30. Traffic already backs up through the village and to the north when the level crossing barriers are down.
- Development could result in demolition of a listed building.
- The loss of open countryside, productive agricultural land and wild life habitat would be huge.
- Issues in favour of the site included:
 - A respondent advised: best place in Feniton to build much needed new houses the land is relatively flat and being on the North Weston side of Feniton does not interfere with Old Feniton and has no heritage impact its nice and close to a train station giving residents easy access to Exeter and Honiton
 - The site promoter of Feni_11 confirms that the site scores well in SA terms and is generally unconstrained. Landscape impacts could be minimised through planting of a landscape buffer and development on the site would represent a logical and integrated extension of the settlement with some degree of containment within the existing settlement framework. The creation of a landscape buffer on the northern, eastern and western extents of the site, with associated native structural tree planting, would substantially reduce landscape and visual effects with respect to sensitive visual receptors. Furthermore this would provide an new defensible landscape buffer to the north of Feniton, creating a softer and more

<p>integrated settlement edge to the village than exists at present.</p>	
<p>LP_Feni_10 - Westlades, Feniton - Potential 'Second Best' Allocation</p> <ul style="list-style-type: none"> • Objection to site Feni_10 as a development choice were raised on the grounds of: <ul style="list-style-type: none"> ○ This site is north of the railway line. It is some distance away from access to the A30. Traffic already backs up through the village and to the north when the level crossing barriers are down. ○ Too close to old Feniton Village and will spoil the land. ○ Building here would be detrimental to the government's aim to cut greenhouse gasses by removing these well established trees. As such a small site it would be impractical in achieving your target of delivering houses. ○ Would exacerbate traffic pressure on old Feniton with existing roads already used as a "rat-run". • In support of the site was representation reading: <ul style="list-style-type: none"> ○ As owners of site LP Feni 10, we can confirm that this site is deliverable as set out in Local Plan Appendix 2 Site Selection- interim findings at Tier 4 settlements. 	<ul style="list-style-type: none"> • Concerns around suitability of the site for development are noted. • Proximity facilities and transport issues are also noted, though the size of Feniton is such that these are not seen as major or over-riding considerations. • Proximity to old Feniton village is noted, though there is a not inter-visibility between the site and the old village. • It would be envisaged that if the site were developed it would be done so with limited tree loss. • Owners observations on availability are noted.
<p>LP_Feni_15 - Long Park Farm, Feniton - Potential 'Second Best' Allocation</p> <ul style="list-style-type: none"> • Objection to site Feni_15 as a development choice were raised on the grounds of: 	<ul style="list-style-type: none"> • Existing orchard use of the site is noted and whilst this is a particular land use it is not unique and can be replicated through new planting. The orchard trees, and through their management, will be of lower biodiversity value than other woodland/tree planted habitats. • The observations around site suitability from the agents are noted.

<ul style="list-style-type: none">○ This site is currently an established orchard. Trees are so important to the world an orchard really should be prioritised over other forms of land use.○ Alongside the inherent food production value, the area is a wildlife habitat. Rare bird have been seen in the trees and owls are heard at night.● Issues in favour of the site included:<ul style="list-style-type: none">○ From agents, Mantra Planning, acting for the landowner made representation advising that LP_15 and land to the east, Feni_03 (though in representation reference is to Feni_13 and also Feni_12) are suitable and appropriate for development they consider:○ Feniton is, in principle, an appropriate location to accommodate residential development, they cite the role and function if settlement study;○ The note lack of landscape, heritage or ecological constraints as highlighted in the sustainability appraisal○ Weight should not be attached to Devon County Council education capacity comments as concerns raised are a widespread strategic issue, apply to many sites and education provision can be addressed;○ It is considered it is highly unrealistic that the sites will be utilised for mineral working in the future;○ In landscape terms the site is shielded from wider landscape views○ The site feels close to the centre of Feniton;	<ul style="list-style-type: none">● It is noted that Feniton is suited to some development and there are comparative lack of constraints at the site.● Concerns over suitability for mineral extraction are noted (further work could address these concerns).● Proximity to the village and facilities, of the site, is noted. Though this applies to many Feniton sites and accessing facilities does mean using the pedestrian crossing of the railway line.
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<ul style="list-style-type: none"> ○ A Planning Permission in Principle applies to part of the overall site area; 	
<p>LP_Otry_20 - Land to the south-east of Bridge Cottages - Potential 'Second Best' Allocation</p> <ul style="list-style-type: none"> • Objection to site Feni_20 as a (employment site) development choice were raised on the grounds of: <ul style="list-style-type: none"> ○ This site is currently an orchard. Trees are a vital part of our environment. Granting permission for these to be replaced by buildings would fly in the face of the recently adopted Devon Tree Strategy. ○ Green Lane cannot handle increased traffic. The exit onto Ottery Road is dangerous and includes a blind corner, there are also blind pinch points by the railway bridge. ○ There is no pedestrian footpath along any part of Green Lane. ○ The building is a chicken farm which hasn't been used for 3 years but will be used in future to enhance our agricultural heritage here in Feniton. ○ The roads around this site flood from surface runoff. Mantra Planning, acting for the landowner advised: <ul style="list-style-type: none"> ○ Otry_20 has been submitted for inclusion as an employment/ Commercial site. There is an existing agricultural barn on site which would benefit from Class R (GPDO 2015 as amended) Permitted Development Rights. The wider site is available for commercial/ employment use and this includes the erection of new buildings. The current trees surrounding the site are that of a commercial apple 	<ul style="list-style-type: none"> • Existing orchard use of the site is noted and whilst this is a particular land use it is not unique and can be replicated through new planting. The orchard trees, and through their management, will be of lower biodiversity value than other woodland/tree planted habitats. • Devon County Council have not raised highway objections, nor pedestrian access concerns. • The lack of use of the chicken farm is noted as are potential permitted development rights that may be associated with the building There are, however, other such farms and places where they could be located. • There have been concerns raised/comments noted around the lack of employment provision at Feniton. If developed for employment use the site could address some or many of the concerns and provide scope for new jobs and businesses.

<p>orchard, a suitable tree strategy could be implemented which sees partial removal of the orchard.</p> <ul style="list-style-type: none"> • Issues in favour of the site included: <ul style="list-style-type: none"> ○ There are very few employment opportunities in Feniton. The vast majority of people who work therefore have to travel - mostly by car. <p>There is an existing agricultural barn on site which would benefit from Class R (GPDO 2015 as amended) Permitted Development Rights. The wider site is available for commercial/ employment use and this includes the erection of new buildings. The current trees surrounding the site are that of a commercial apple orchard, a suitable tree strategy could be implemented which sees partial removal of the orchard.</p>	
<p>Omission sites at Feniton</p> <ul style="list-style-type: none"> • The land promoter requests that further consideration be given to sites Feni_12 and Feni_13 as they were harshly assessed and prematurely discounted from the site selection process based on landscape impacts and mineral consultation area designation. Proximity to existing properties mean that onsite mineral working would therefore raise a number of issues in terms of impacts on existing neighbour amenity levels. It should also be noted that, unlike many of the other MCA sites in the plan area, the mineral rights for these sites are in private ownership and are unlikely to be sold to any third party. Therefore, it is highly unrealistic that the sites will be utilised for mineral working in the future and further consideration should be given to their allocation in the draft Local Plan, particularly given their suitability in all other areas. 	<p>These sites overlap Feni_03 and comments associated with that site should be read alongside that site and its comments. However the specific mineral comments made are noted, including in respect of private landowner matters na dproximity to exoisting dwellings and adverse impacts mineral workings could have and therefore their possible acceptability. In landscape terms, like much of Feniton, adverse impacts from development would not be great, but the sites are comparatively more sensitive than some other sites at the village.</p>

<p>The sites were assessed as being of “some prominence in landscape terms.” We would respectfully point out that the sites are bordered by residential development on two sides and rising land to the south; any development would therefore either be obscured by or seen within this built context. In addition, any formal application would be informed by a landscape assessment to ensure a sensitive scheme is developed and mitigation measures incorporated to avoid, reduce or offset significant negative effects on the landscape.</p>	
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>Employment Otry_20 – preferred allocation The responses to the question about allocating site Otry_20 show mixed opinions, with a majority expressing concerns about various aspects of the proposed allocation. The main issues revolve around traffic and access, environmental impact, and the site's suitability for employment use.</p> <p>Key points raised, in order of frequency:</p> <ol style="list-style-type: none"> 1. Traffic and access concerns <ul style="list-style-type: none"> ○ Narrow, unsuitable roads for increased traffic, especially larger vehicles ○ Dangerous junctions and lack of pedestrian safety ○ Limited public transport options 2. Environmental and wildlife concerns <ul style="list-style-type: none"> ○ Need for nutrient neutrality and environmental betterment 	<p>Officer commentary in response, but see also other comments above in respect of Otry_20:</p> <ul style="list-style-type: none"> ● Concerns raised are noted, though many are local site specific considerations (such as highway concerns) that are no subject to regulatory body objections. ● Whilst we are not aware of archaeological concerns these would be relevant for consideration at planning application stage. ● Whilst challenges of viability for employment use are noted we have received concerns around lack of employment opportunities at the village. ● Matters raised around impacts on SPAs and Sacs are noted the site is some distance from designated features. ● Whilst parts of the site are relatively close to the Grade II listed building (Sweethams) there is scope for planting mitigation as suggested and also careful development treatment at/toward north- westerly site boundaries. ● Other constraining considerations raised in comments are noted though none are seen as insurmountable or fundamentally significant to not progress with an allocation.

- Value of existing orchard for insect life and wildlife
- Preference for keeping the land as a green buffer or small holding
- 3. Archaeological considerations
 - Area of archaeological potential, particularly Bronze Age sites
 - Need for evaluation and mitigation
- 4. Questioning the need and suitability
 - Doubts about the viability of employment use in this location
 - Site outside the village boundary
 - Concern about attracting workers from outside the immediate area
- 5. Limited support
 - Conditional support if there's a viable need in the village
 - Broad support from Honiton Town Council

Statutory organisations summary

Natural England

Depending on type of development, may trigger Impact Risk Zone for impact on East Devon Pebblebed Heaths SPA and SAC if there is any industrial / agricultural development that causes air pollution incl: industrial processes, livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 4000m².

Historic England

Owing to the location and topography, development of the site is likely to impact on the setting of at least one Grade II listed building (Sweethams) and potentially other designated and non-designated heritage. We therefore request that it is include in the HESA and that recommendations are made for appropriate mitigation to inform policy criteria. Should the site be progressed as an allocation, we request that consideration is given to appropriate policy criteria such as boundary planting, limiting the height of development, and design and materials that are in keeping with the rural setting.

Network Rail

State the allocation should include engagement with Network Rail to ensure that sufficient land is available to allow access to railway for operational purposes.

Devon County Council

Highways state current practice/use as an orchard and poultry house. Proximity of the site likely to encourage independent travel with modest services in the area to promote sustainable travel. Historic Environment state this proposed allocation site lies in a landscape where recent archaeological investigations have demonstrated the presence of prehistoric settlement and funerary activity in the landscape surrounding Feniton. As such, the Historic Environment Team would advise that any planning application for development here should be informed and supported by the results of an appropriate programme of archaeological investigation to understand the significance of any heritage assets affected and enable an informed and reasonable

<p>planning decision to be made. The programme of work should consist of a geophysical survey and intrusive archaeological field evaluation.</p> <p>Economy state while supportive of new employment space being brought forwards, this site is not strategically located nor close to existing employment infrastructure.</p> <p>Environment Agency Site at Feniton includes constraints including railway land, and historic landfill. These previous uses pose soil and groundwater contamination risk. We also note that this is a site over which the proposed Feniton flood alleviation scheme will pass which could further constrain development potential.</p>	
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<h2 style="margin: 0;">Development at Service Villages – Hawkchurch</h2>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The Environment Agency note that the village is in the catchment of the River Axe SAC and that development will need to be nutrient neutral. • Object to Hawkchurch being classified as a Tier 4 settlement, it should not accommodate development. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • As a Tier 4 settlement with a range of services Hawkchurch is required to accommodate some new development, in accordance with the housing and other strategies of the Plan. The Plan’s strategy is to identify settlement boundaries at Tier 1-4 settlements and allow appropriate windfall development within them in addition to allocating appropriate sites. There is no justification for not identifying a boundary or allocating a site in Hawkchurch.

- The scale of development proposed at Hawkchurch is far too high given it has had the highest number of new houses of any village in East Devon in the last 20 years.
- 20 houses is more realistic for Hawkchurch.
- Development will increase the number of cars travelling along narrow lanes, safety concern.
- Lack of jobs and facilities apart from a shop and once a week bus service.
- Increasing population by 30% without improving local services and transport is irresponsible.
- Proposed development will mean a loss of tranquillity in this rural village.
- Adverse impact on water supply and sewerage.
- Insufficient infrastructure, facilities and roads for additional development.
- Will spoil character of beautiful area.
- Hawkchurch Parish Council (PC) – The PC makes the following conclusions regarding the draft Local Plan:
 - The inclusion of Hawkchurch as a Tier 4 village is based on flawed assumptions (including the claimed hourly bus service which in reality is one service per week) and does not align with the spatial and low carbon strategic policies.
 - The level of proposed development is too high, is not required locally and there would be a significant negative impact from the scale of development on the character of the place.
 - It would be preferable for the Neighbourhood Plan to identify sites for smaller scale development that is in keeping with local needs.

- It is noted that development will need to achieve nutrient neutrality.
- Hawkchurch has not had a higher proportion of new development than any East Devon village in the last 20 years.
- DCC as Local Highways Authority consider that the local road network has capacity for the level of development proposed.
- Infrastructure considerations are noted but are addressed under other policies of the Plan.

- **LP_Hawk_01 - Norton Store, Hawkchurch - Preferred Allocation**

- DCC Highways advise that the access is acceptable.
 - The site was originally assessed on the basis of accommodating 38 houses and 0.15ha of employment land. In response to suggestions that this would represent over development of the site, insufficient space for car parking associated with the employment land and not allow for retention of the village shop, it is proposed to amend the scheme to:

12 houses and 0.25ha of employment land (the existing employment/former agricultural buildings, space for the relocated shop plus parking and service space)

- The boundary has been redrawn to exclude the mature tree in the centre and allows for new planting and landscaping.

LP_Hawk_02 - Field south-east of Hawkchurch School, behind and adjacent to School Close - Rejected Site

- It is agreed that this site is unsuitable for additional development.

Omission sites at Hawkchurch

<ul style="list-style-type: none">○ The proposed development is identified as a 32% increase in housing. Does the 32% include exception sites in the calculation rather than development within the settlement boundary only.○ Siting large scale development in Hawkchurch runs counter to the spatial and low carbon strategies as proposed.○ The figure of 38 houses does not account for the 0.6Ha of employment space and should be reduced accordingly.○ The approach to each allocation has not been consistent with regard to the minimum / maximum allocations for each site.○ Changes to the settlement boundary are not clear in terms of both revisions made and the rationale for the inclusion of land. <ul style="list-style-type: none">● Hawkchurch Parish Council (PC) - Multiple residents commented on the lack of public transport, increased traffic, access at the junction, narrow lanes, congestion in the centre of the village, inadequate infrastructure (drainage, sewerage, and water supply systems), impact of traffic on pedestrians (including elderly residents and children on roads with no paving), and limited local employment opportunities. A housing estate shouldn't be in a rural village, the proposed density of housing is too high, partly green site, actively used pastureland, the shop is a tiny community shop and has limited supplies, the children's playground in the centre of the village is adjacent to the proposed access road junction with	<ul style="list-style-type: none">● None identified
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the main street, the shop is located on the site to be developed.

- Hawkchurch Parish Council (PC) - Reasons cited against the development of employment land at this site include: Noise, increased traffic, access, narrow lanes, spoil the peace and tranquillity of the place, won't create employment for villagers, even more parking needed, current industrial units are not fully occupied.

LP_Hawk_01 - Norton Store, Hawkchurch - Preferred Allocation

- This site was rejected in the SHLAA 2014 because of poor access.
- CG Fry & Son Ltd on behalf of client
 - G Fry supports the inclusion of Hawkchurch as a Service Village capable of supporting limited new development. Such new development is the lifeblood of smaller settlements and helps to support local services and facilities which are, in the case of Hawkchurch, the primary school, public house and village/community shop. Such new development is often promoted by landowners themselves or SME housebuilders such as C G Fry and the quality of development and quality of local engagement around its delivery is highly likely to be far superior to larger PLC/volume housebuilder schemes. Schemes like this support the SME sector and support the delivery of high quality local open market and affordable homes.
 - C G Fry has instructed a technical team to assess Hawk_01 and those investigations confirm that the site is suitable, available and deliverable and has no

obvious constraints beyond the matter of phosphates in the River Axe SAC catchment. Studies undertaken include preliminary drainage assessment, foul drainage assessment, wider utilities assessment, ecological assessment, landscape assessment work on physical access into the site and wider connectivity.

- C G Fry can see no practical reason why this proposed allocation should not proceed and C G Fry looks forward to engaging with the Hawkchurch community to deliver a high-quality housing-led scheme.
- C G Fry would also be delighted to engage with Officers to discuss and share the evidence base at the appropriate juncture. For now, C G Fry looks forward to the allocation being retained in the emerging LP.

- Suggestion that the allocation would represent over development of the site / locale.
- Totally unsustainable with only one bus per week. The heavy traffic on the single lanes is already dangerous. And everyone who moves into the proposed new dwellings will drive cars. So much for your vaunted climate change policy!!
- Concerns expressed from multiple representations over lack of infrastructure with implications for road network, school places, health services, flooding, drainage, sewage, local facilities.
- Concerns expressed over local biodiversity, trees and hedgerows.

LP_Hawk_02 - Field south-east of Hawkchurch School, behind and adjacent to School Close - *Rejected Site*

<ul style="list-style-type: none"> • The number of homes planned for Hawkchurch, 38, is simply not feasible. This is a small, rural village, accessed by narrow lanes, serviced by a once-a-week bus, with only a village shop as an amenity. The village school will not be able to accommodate the number of additional children, the road cannot support an additional 38-76 vehicles, there are limited job opportunities within the village so people will have to travel for work if not able to work from home. The proposed locations mean the houses will be 'packed in', and therefore unlikely to be in keeping with the area and road access to the sites is already poor. 38 homes is simply too many for the village to support. • This is not an appropriate site for further development. I believe the building of some additional homes can be supported, but not a development of 38 homes. Hawkchurch does not have the infrastructure to support an increase in population of that order. A cap of 20 homes should be applied. <p>Omission sites at Hawkchurch</p> <ul style="list-style-type: none"> • None identified 	
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Further Regulation 18 consultation Spring 2024	
Key issues raised in consultation: None	Officer commentary in response: None

Development at Service Villages – Kilmington

Draft Plan consultation	
<p>Key issues raised in consultation: General issues:</p> <ul style="list-style-type: none"> • None identified <p>LP_Kilm_01 - Land off Shute Road, Kilmingon - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Destruction of farmland. • This is just another piece ribbon development as are most sites in Kilmingon. Inappropriate. • Outside the original building area and too far out of the village. Encroaching on the Shute Woods area. <p>LP_Kilm_02 - Birchwood Farm, Shute Road, Kilmingon - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Outside of building line, developments should be infill only. • Destruction of farmland impacts on the ability to provide crops for both human and animal consumption. There would be a huge impact on the local ecology and habitat, especially with climate change looming. • Ribbon development and destruction of high quality farmland essential to UK's food security. • Would not want this site developed. <p>LP_Kilm_03 - Land off Springhead Lane, Kilmingon - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Poor road access, loss of habitat • The site would be a great location for a small-scale housing development for locals and key workers. The site borders 	<p>Officer commentary in response:</p> <p>LP_Kilm_01 - Land off Shute Road, Kilmingon - Rejected Site</p> <p>LP_Kilm_02 - Birchwood Farm, Shute Road, Kilmingon - Rejected Site</p> <ul style="list-style-type: none"> • Noted the nature and location of the site, agreed with the representation and did not suggest allocation. <p>LP_Kilm_03 - Land off Springhead Lane, Kilmingon -Rejected Site</p> <p>LP_Kilm_04 - Paddock off Springhead Lane, Kilmingon - Rejected Site</p> <ul style="list-style-type: none"> • Noted the nature and location of the site, and the concern regarding the access road, agreed with the representation and did not suggest allocation. <p>LP_Kilm_05 - Land at Pit Orchard, Bimbom Lane, Kilmingon - Rejected Site</p> <ul style="list-style-type: none"> • Noted the nature and location of the site, agreed and did not suggest allocation. • Concern raised regarding access issue, worth noting that Devon County Council (Highways) has no objection to the access. <p>LP_Kilm_06 - Land at Gore Lane, Kilmingon - Rejected Site</p> <ul style="list-style-type: none"> • Noted the nature and location of the site agreed with the representation and not suggest for allocation.

<p>some woodland, but it has been untouched for many a year and has not been maximised for its ecological benefit.</p> <ul style="list-style-type: none"> • Ribbon development causing destruction of high quality farmland essential to UK's food security. • This is outside the existing building area of the village. It is good agricultural land - we do not want to lose it. • Would not want this site developed as access off springhead lane would mean increased traffic through the centre of village to access the A35, via The Street, The Hill and George Lane. <p>LP_Kilm_04 - Paddock off Springhead Lane, Kilmingtion - Rejected Site</p> <ul style="list-style-type: none"> • Outside of building line, Poor road access, loss of unspoilt habitat • Ribbon development. Destruction of high quality farm land essential to UK's food security. • Would not want to see this site developed as access to it via Springhead Lane it would result in increased traffic through the central part of the village to reach the A35 via The Street, The Hill and George Lane <p>LP_Kilm_05 - Land at Pit Orchard, Bimbom Lane, Kilmingtion - Rejected Site</p> <ul style="list-style-type: none"> • Poor road access, too close to conservation area, loss of habitat • Outside of building line, road access unsuitable, not suitable for development • Inappropriate development onto narrow dangerous lane; public transport and amenities such as shops, schools etc. 	<ul style="list-style-type: none"> • Concern was raised regarding the visual impact and agreed with the landscape impact. • Concerns were raised regarding access issues. Devon CC -Highways has no objection to the access. <p>LP_Kilm_07 - Land adjoining Breach, Kilmingtion - Rejected Site</p> <ul style="list-style-type: none"> • Noted the nature and location of the site agreed with the representation and not suggest for allocation. <p>LP_Kilm_09 - Land east of George Lane, Kilmingtion -Preferred Allocation</p> <ul style="list-style-type: none"> • Noted the comment from Devon County Council (DCC) stating this site has surface water flooding and an unmapped ordinary watercourse which should be considered as part of the design. • Noted that the concern from DCC regarding the site falls within the Waste Consultation Zone. • General support noted, despite concern regarding next to busy A35 road and suggestion on the yield. • Concern regarding NL was noted, which is a common concern for all the sites within Kilmingtion. And the suggested site would have less impact compared to other sites within Kilmingtion. • LP_Kilm_07 - Land adjoining Breach, Kilmingtion - Rejected Site • Noted the nature and location of the site agreed with the representation and not suggest for allocation. • LP_Kilm_09 - Land east of George Lane, Kilmingtion -Preferred Allocation
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only accessible via such lanes or A35. All residents would require personal transport.

- This site should not be developed as access is poor via very narrow single track roads- BimBom Lane and Silver Street. Traffic from the site would have to use these lanes and also George Lane, increasing vehicles traveling through the central residential part of the village to reach the A35.

LP_Kilm_06 - Land at Gore Lane, Kilmington - *Rejected Site*

- Destruction of high quality agricultural land essential to UK's food security. Development would be adjacent to narrow dangerous lanes and would vastly increase vehicular traffic as there is no public transport serving this area and highly unlikely to be any in near to mid-term, maybe never.
- Would not want to see this site developed as it would result in increased number of vehicles traveling through the residential area of the village to reach the A35. The site is also on higher ground so the development would be very visible to the rest of the village.

LP_Kilm_07 - Land adjoining Breach, Kilmington - *Rejected Site*

- Outside of building line, poor road access, loss of more unspoilt habitats.
- Infill but access via poor quality lane and adding traffic to narrow lanes.
- Situated on a pleasant footpath - would spoil the walk.
- Not the place for a lot of housing which would not sit well with the surroundings. One or two houses could fit.

- Noted the comment from Devon County Council (DCC) stating this site has surface water flooding and an unmapped ordinary watercourse which should be considered as part of the design.
- Noted that the concern from DCC regarding the site falls within the Waste Consultation Zone.
- General support noted, despite concern regarding next to busy A35 road and suggestion on the yield.
- Concern regarding NL was noted, which is a common concern for all the sites within Kilmington. And the suggested site would have less impact compared to other sites within Kilmington.

LP_Kilm_10 – Land to the west and south-west of The Old Inn, Kilmington - Potential ‘Second Best’ Allocation

- Noted that the concern from DCC regarding the site falls within the Waste Consultation Zone.
- A mixed view of the site was noted. Certain support for the location of the site and fit in the surrounding area when it is close to existing housing. Concern regarding the site close to A35 road and listed building, also questioning the yield and access. DCC – highways have no objection to the access and the yield follows the standard methodology.

LP_Kilm_11 - Land to the east of and off Whitford Road between Ashes Farm and The Beacon Chapel, Kilmington – Preferred Allocation

- The site changed from preferred allocation to not recommended for allocation, as based on the methodology the site would not be recommended as it is one of the Neighbourhood plan allocations.

LP_Kilm_09 - Land east of George Lane, Kilmington - Preferred Allocation

- Devon County Council (DCC) state this site has surface water flooding and an unmapped ordinary watercourse which should be considered as part of the design.
- DCC note this site falls within the Waste Consultation Zone for Gammons Hill Waste Transfer site, which should not be constrained by development (see Waste Plan Policy 10).
- Place Land disagrees with the statement that the Neighbourhood Plan takes precedence over the Local Plan. The Local Plan will take precedence once adopted, and the Parish Council has acknowledged that the Neighbourhood Plan may need to be reviewed.
- Place Land supports the proposed capacity of 37 dwellings for Kilm_09. This is based on further design work that has been undertaken, including landscape appraisal, drainage strategy, ecology survey, and heritage appraisal. The findings of the additional surveys confirm that the site is capable of accommodating around 39 dwellings.
- This site in the heart of the village - should be developed smartly to provide new pedestrian and nature interconnecting pathways in the village. Housing should be affordable, low density & very low energy to address the imbalance of older generations & larger homes in the village. This could be a clear demonstration of how to do in-fill development the right way rather than just for profit.
- Allocation of 37 homes - too many. Smaller is preferred
- Although it is a shame about the proximity to the busy A35 (could a reduction in the speed limit be reconsidered) it is a good site. It would be really important to consider some

- Historic England raised concerns regarding the heritage impact, and the neighbourhood plan has prepared a heritage impact assessment. Further details should be provided during the planning application.
- Noted DCC comment regarding the surface water flooding issue.
- Support of the allocation noted

LP_Kilm_12 - Land on the north side of Shute Road (Gapemouth Corner), Kilmington - Rejected Site

- Noted the nature and location of the site, agreed with the representation and did not suggest allocation.
- Concern was raised regarding the recent loss of trees, and the suggestion for planting more trees to be a sound barrier from the road noise. Worth noting that. The site has been authorised to clear the felling of conifer species under the felling licence, which is conditional, requiring the felled area to be restocked with broadleaved trees by 30th June 2026. The restocked trees must be maintained and protected for a period of ten years from the restocking having occurred. Noted that the concern from DCC regarding the site falls within the Waste Consultation Zone.
- A mixed view of the site was noted. Certain support for the location of the site and fit in the surrounding area when it is close to existing housing. Concern regarding the site close to A35 road and listed building, also questioning the yield and access. DCC – highways have no objection to the access and the yield follows the standard methodology.

LP_Kilm_11 - Land to the east of and off Whitford Road between Ashes Farm and The Beacon Chapel, Kilmington - Preferred Allocation

shared ownership properties for local people. There is a very limited supply of housing stock in the village. This is particularly difficult for first time buyers who are key workers and on a limited income.

- The last development only included affordable rentals which obviously does not help anyone get onto the property ladder.
- A logical develop site but will be noisy from A35 and be dangerous vehicular access either via George Lane or direct onto A 35
- Good site, nearer to the village facilities and easy access to the main road
- It is an AONB site with rooks and buzzards nesting. It will have a huge impact on my property and our road.

LP_Kilm_10 – Land to the west and south-west of The Old Inn, Kilmington - *Potential ‘Second Best’ Allocation*

- DCC note this site falls within the Waste Consultation Zone for Gammons Hill Waste Transfer site, which should not be constrained by development (see Waste Plan Policy 10).
- Very poor road access as on to the A35, too close to listed building.
- Too large a development area. High impact on local community.
- Obvious position although increased vehicular traffic onto Whitford Rd/Old Inn junction to be deplored.
- Not a very good site really - would only be good for 1 or 2 houses.
- Already has houses near this site, a good way to fill in, good access to main road.
- Adding this site with just five houses to the A35 site next to it, seems logical in the future. However too many new houses

- The site changed from preferred allocation to not recommended for allocation, as based on the methodology the site would not recommended as it is one of the Neighbourhood plan allocations.
- Historic England raised concerns regarding the heritage impact, and the neighbourhood plan has prepared a heritage impact assessment. Further details should be provided during the planning application.
- Noted DCC comment regarding the surface water flooding issue.
- Support of the allocation noted

LP_Kilm_12 - Land on the north side of Shute Road (Gapemouth Corner), Kilmington - Rejected Site

- Noted the nature and location of the site, agreed with the representation and did not suggest allocation.
- Concern was raised regarding the recent loss of trees, and the suggestion for planting more trees to be a sound barrier from the road noise. Worth noting that. The site has been authorised to clear the felling of conifer species under the felling licence, which is conditional, requiring the felled area to be restocked with broadleaved trees by 30th June 2026. The restocked trees must be maintained and protected for a period of ten years from the restocking having occurred.

too quickly could increase the population too quickly and the village school and village hall etc would not be big enough. This site would give access via a footpath from George Lane to the recreation ground and on to Whitford Road. The car park at the Old Inn needs to be a reasonable size as in the summer it can get full.

LP_Kilm_11 - Land to the east of and off Whitford Road between Ashes Farm and The Beacon Chapel, Kilmington - Preferred Allocation

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Particularly with regard to proximity of Grade 2* listed Church.
- Devon County Council (DCC) state this site has surface water flooding and an unmapped ordinary watercourse which should be considered as part of the design.
- Density of housing should be suitable for the site, i.e. plenty of space not crammed in for maximum profit. Needs to fit in with adjacent properties. Should have shielding from light pollution from the nearby Petrol Station.
- Ideal site especially for bungalows for the older population, & would free up larger homes in the village.
- This housing makes sense for elderly people as it's close to the village hall, churches, recreation ground for walking and shops. It fits well along the Whitford Rd.

<p>LP_Kilm_12 - Land on the north side of Shute Road (Gapemouth Corner), Kilmington - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Outside of building line, loss of village buffer to A35, already had loss of trees on this site which should be allowed to regenerate • Recent destruction of tree cover means the noise block for the village has been lost. Properties here would be noisy and add dangerously to traffic onto the A35. Not a sensible development. • It should be tidied up and planted with more trees to be a sound barrier from the road noise. • Would not want to see development on this site as the woodland will create a buffer between the busy, noisy A35 and the housing in the central part of the village. <p>Omission sites at Kilmington</p> <ul style="list-style-type: none"> • None identified 	
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Development at Service Villages – Musbury

Draft Plan consultation	
<p>Key issues raised in consultation:</p> <p>The Environment Agency note that the village is in the catchment of the River Axe SAC and that development will need to be nutrient neutral.</p>	<p>LP_Musb_01a - Baxter's Farm, The Street, Musbury</p> <ul style="list-style-type: none"> • A level 2 Strategic Flood Risk Assessment has been undertaken. Other comments are noted and can be mitigated – the policy includes for the provision of Gypsy and Traveller pitches elsewhere. • No other sites are allocated in Musbury.

LP_Musb_01a - Baxter's Farm, The Street, Musbury - Preferred Allocation

- Devon County Council, as landowner, supports allocation as site but feels that no boundary should be draft to separate it from Musb_02 until a development layout is put forward through a planning brief or a planning application.
- The Environment Agency note that part of the north of the site is within floodzone 3 and state that this area should be set aside as GI, with a buffer of at least 8m from the watercourse, free from built development.
 - Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Opportunity for retention of farmstead buildings that contribute to the character and appearance of CA
- Use of village hall could cause disturbance for future residents so better for small industrial starter units.
- Conversion of existing buildings good.
- Not suitable for traveller pitches because of potential for clashes with village hall and pub.

LP_Musb_01b - Baxter's Farm, The Street, Musbury - Rejected Site

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of

this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.

- Agree site should not be used.
- Representation on behalf of landowner for other sites in Musbury queries deliverability of site.

LP_Musb_02 - Maidenhayne Lane, Musbury - *Rejected Site*

- Representation on behalf of landowner stated that the land is no longer available for development (it has been withdrawn from the HELAA process).
- Agree this orchard site should not be used – access is dangerous.

LP_Musb_03 (whole site) - Churchpath Road, Axminster Road, Musbury - 3a - *Potential 'Second Best' Allocation / 3b - Rejected*

- Representation on behalf of landowner states that access to Doatshayne Lane could be improved and there is scope for a new access to the A358 with a footway providing safe access to the bus stop and village services.
- Representation on behalf of landowner suggests whole site should be allocated to allow holistic approach and making the most of site opportunities and contributing to meeting overall housing targets.

LP_Musb_03a - Churchpath Road, Axminster Road, Musbury - *Potential 'Second Best' Allocation*

- Do not think should be included as green field and access is potentially dangerous.

LP_Musb_03b - Churchpath Road, Axminster Road, Musbury - *Rejected Site*

- Agree site should not be built on as it is a green field.

LP_Musb_04 - Field known as Adcroft, Mounthill Lane - *Rejected Site*

- Representation on behalf of landowner states that the lower parts of the site could be developed with a negligible impact on landscape and any residual impacts could be mitigated as there is significant space for landscaping and view to the Grade 1 listed church are largely screened by woodland. Site is well related to core of village.
- Agree site should not be built on as it is a green field.

LP_Musb_05 - Doathayne Lane, Musbury - *Planning Permission Granted*

- Representation on behalf of landowner states that the site should be considered as there is no extant planning permission.
- Would provide some family housing in village with high proportion of older people.
- Close to allotments and playing field for families.

Omission sites at Musbury

- None identified

Development at Service Villages – Newton Poppleford

Draft Plan consultation

Key issues raised in consultation:

General Issues:

- Surprised that Newton Poppleford has no allocations given it is well-served by buses, and a new and thriving primary school.
- Make Back Lane more vehicle-friendly and it will have potential for development.
- Create a public park in the Back Lane area to adjoin existing recreational areas, and at the former railway station.
- Village centre could be improved.

LP_Newt_01 - Goosemoor Farm, Exeter Road, Newton Poppleford - *Rejected Site*

- Happy with the proposal to refuse.

LP_Newt_02 - Littledown Farm, Littledown Lane, Newton Poppleford - *Rejected Site*

- Happy with the proposal to refuse.
- A couple of respondents noted that there is no safe way to walk or cycle to the village.
- Turning onto Exmouth Road is dangerous.
- Motorists speed along Exmouth Road.

Two housing allocations are now proposed

- LP_Newt_04 - Land to the west of Badger Close and LP_Newt_05 - Land to the east of Exmouth Road
- The allocation of these sites is dependent on improved footpath links to the village centre.
- The allocations are considered to constitute major development in the East Devon National Landscape for which there are exceptional circumstances.
- No other allocations are proposed.

- In AONB and site is covered with trees and wildlife.
- Access via Littledown Lane is on a corner and unsuitable for additional traffic.

LP_Newt_03 - Land north of Burrow Lane, Newton Poppleford - *Rejected Site*

- Agree site should not be developed as in the AONB and building would be highly visible.

LP_Newt_04 - Land to the west of Badger Close, Newton Poppleford – Previously *Rejected Site now allocated*

- Happy with proposal to refuse development as no safe way to walk to village facilities, AONB and good agricultural land.
- Previous application to build was refused on appeal.

LP_Newt_05 - Land to the east of Exmouth Road, Newton Poppleford - Previously *Rejected Site now allocated*

- Happy with proposal to refuse development as no safe way to walk to village facilities, AONB and good agricultural land.

LP_Newt_07 - Land off Back Lane, Newton Poppleford - *Rejected Site*

- Access onto Venn Ottery Road is too narrow for more cars.
- Agricultural land in AONB.

LP_Newt_09 - Field adjacent to Hawthorn House, Back Lane, Newton Poppleford - *Rejected Site*

- Access onto Back Lane is too narrow for more cars.

- Agricultural land in AONB.

**LP_Newt_10 - Land north of Back Lane, Newton Poppleford -
*Rejected Site***

- Access onto Back Lane is too narrow for more cars.
- Heavily wooded and in AONB.
- Adverse impact on wildlife.

**LP_Newt_11 - Oak Tree Garage, Station Road, Newton
Poppleford - *Rejected Site***

- Access to A3052 is dangerous and on a floodplain.

LP_Newt_12 - Coal Yard, Newton Poppleford - *Rejected Site*

- No Comments

**LP_Newt_13 - Land off Down Close, Newton Poppleford -
*Rejected Site***

- Too far from village centre along unpaved, unlit footpath which is unsafe for a large section.
- Important trees and site on rising ground where development would be visible against the treeline.
- Impact on AONB.
- Impact on wildlife.

**LP_Newt_14 - Seniors Farm Yard, Newton Poppleford -
*Rejected Site***

- Happy to refuse as access to village facilities by foot or cycle is incredibly dangerous as is access for cars turning onto A3052.

<p>LP_Newt_15 - Land to the north of Exeter Road, Newton Poppleford - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • Dangerous for people to walk or cycle to village facilities and dangerous to turn onto A3052 as on a bend. • Floodplain. <p>LP_Newt_16 - Land to the rear of Langford Mews, Newton Poppleford - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No Comments <p>LP_Newt_18 - Pearces Yard, Bridge End - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • This section of the A3052 is extremely dangerous not only for walkers and cyclists but for vehicles trying to turn onto the A3052. • Low lying land on floodplain. <p>Omission sites at Newton Poppleford</p> <ul style="list-style-type: none"> • None identified 	
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<p>Development at Service Villages – Otterton</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p>	<p>LP_Otto_01 - Land off Bell Street, Otterton</p> <ul style="list-style-type: none"> • The address has been altered to Land north of Behind Hayes

General Issues:

- Otterton Parish Council held consultation events that informed a survey and discussion on various forums. The findings were that:
 - 6/10 respondents were against further development;
 - The preferred development site was Otto_04, followed by Otto_2, Otto_3a, Otto1 and lastly Otto_3b;
 - 94% voted in favour of more affordable housing noting that the village contains a lot of small privately rented homes and demand from first time buyers outstrips supply;
 - There is concern about elderly people having to leave the village to downsize and 89% supported more housing suitable for older people;
 - Only 33% wished to see larger family homes;
 - Almost unanimously parishioners supported local people seeking to buy their own property, including first time buyers – self build schemes were not widely supported;
 - People were concerned about the effect of further housing development in terms of traffic congestion and many wanted to see a new car park; and
 - Any new housing should have individual driveways for each home.
 - What measures are in place to replace green space is developed?
 - Will existing trees and hedges be retained?
 - Properties along main road are prone to flooding.
- Concerns relating to landscape and heritage impacts are recognised and the policy requires very careful design and open use on parts of the site to mitigate.
 - Development is considered to constitute major development in the context of the East Devon National Landscape for which there are exceptional circumstances.
 - Devon County Council advise that off-site mitigation measures may be required.
 - LP_Otto_02 - Land adjacent to the North Star
 - Flooding issues are noted and the site is no longer allocated, although it is included in the settlement boundary.
 - No other allocations are proposed in Otterton.

- Hourly bus service is at risk.
- Severe traffic congestion in the summer.
- Single track lanes unsuitable for development.

LP_Otto_01 - Land off Bell Street, Otterton - *Potential 'Second Best' Allocation*

- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Title should read 'Land off Behind Hayes (The Old Orchard).
- Open space is part of character of village with views up to hills from centre of village.
- Risk of runoff to neighbouring properties.
- Difficult access via narrow roads with poor junctions – may need to demolish houses.
- Loss of mature trees.
- Destroys only green lung in centre of village.
- Contributes to distinctive character of village.
- Old orchard sites within village should be protected as form part of open, linear settlement pattern
- Some respondents advise that development would be contrary to neighbourhood plan which retains open areas and rural character.

- Increase in traffic.
- Impact on wildlife.
- Should not be considered because local plan says there is no need for an increase in housing.
- The landowner supports the allocation of this site for housing. It will help support the vitality of the settlement and provide a source of rural housing for local residents, including affordable, and diversify supply.
- Surely only part of the site is needed for just ten homes – neighbourhood plan prioritises smaller homes.

**LP_Otto_02 - Land adjacent to the North Star, Otterton -
*Potential 'Second Best' Allocation***

- The Environment Agency note that part of the site is within floodzone 3 associated with the main river Otterton Brook. The site would need to be subject to SFRA2, and the sequential and exception tests before being allocated. While it may be possible to build outside the area at risk of flooding on the eastern portion of the site, the floodplain cuts it off from Ottery Street so it is unlikely there would be any safe access or egress.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Would like to consider further assessment when available

- Suitable site as long as development does not exacerbate flooding in the village.
- Only site with safe and reasonable access to highway network
- Site remote from school and shop.
- A couple of respondents were concerned about access from a busy narrow road with no footway.
- Narrow stretch of Ottery Street and would need new bridge across Otterton Brook.
- A few respondents were concerned that the lower part of site is at risk of flooding.
- A couple of respondents noted that the site is next to conservation area and development of the site would have a negative impact on it.
- Incompatible with policies ONP1b and ONP31 of the neighbourhood plan.
- Loss of natural habitat.
- Would destroy beauty of fields and open spaces in AONB.
- Contrary to neighbourhood plan.
- Previously Otterton was considered unsuitable for development and no explanation has been given for what has changed.
- The landowner supports the allocation of this site for housing. It will help support the vitality of the settlement and provide a source of rural housing for local residents, including affordable, and diversify supply.

LP_Otto_03a - Land at Hayes Lane, Otterton - *Potential 'Second Best' Allocation*

- Several respondents though the site would be difficult to access and develop.
- There were concerns that the development could compromise children's playground.
- A number of respondents considered the proposed allocation to be contrary to neighbourhood plan as on high ground.
- Detrimental to character of AONB and village.
- Does Otterton require additional housing?
- Not adequately assessed.
- The landowner supports the allocation of this site for housing. It will help support the vitality of the settlement and provide a source of rural housing for local residents, including affordable, and diversify supply.
- Very steep slope and narrow lanes will restrict removal of soil.

LP_Otto_03b - Land at Hayes Lane, Otterton - Rejected Site

- Steeply sloping site unsuitable for development.
- Very prominent site where building would be seen across the valley and harmful to character of AONB and village.
- The landowner supports the allocation of this site for housing. It will help support the vitality of the settlement and provide a source of rural housing for local residents, including affordable, and diversify supply.

LP_Otto_04 - Land east of Rydon Close - *New Site - not assessed*

- The Environment Agency note that part of the site is within floodzone 3 associated with the main river Otterton Brook. The site would need to be subject to SFRA2, and the sequential and exception tests before being allocated. While it may be possible to build outside the area at risk of flooding on the eastern portion of the site, the floodplain cuts it off from Ottery Street so it is unlikely there would be any safe access or egress.
- Savills on behalf of FWS Carter and Sons state this site is incorrectly shown in yellow on the interactive map meaning “not assessed”, however this site was assessed in the HELAA and considered to be available, suitable and probably achievable.
- A couple of respondents would prefer affordable housing to permission for conversion to MOT testing and motorcycle repairs.
- Remote from village.
- Several respondents expressed a preference for housing rather than employment.
- There was some support for more affordable units here or homes for the elderly of the village.
- Flood risk.
- Difficult to walk to village.
- Disruption to wildlife.
- Should not extend beyond existing boundary.
- No need for extra homes.
- Most appropriate site provided flooding issues can be addressed.

<p>Omission sites at Otterton</p> <ul style="list-style-type: none"> • None identified. 	
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Development at Service Villages – Payhembury

<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation: General Issues:</p> <ul style="list-style-type: none"> • None Identified <p>LP_Payh_01 - Units and agricultural field at Slade Barton - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No comments <p>LP_Payh_02 - Agricultural field adjoining Payhembury village recreation ground - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No comments <p>LP_Payh_03 - Agricultural field adjoining Payhembury built-up area - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No comments <p>Omission sites at Payhembury</p> <ul style="list-style-type: none"> • None identified 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Noted that no specific comments are recorded in relation to Payhembury. The justification for some growth at the village is underpinned and supported by the Role and Function of Settlements Study which evidences the inclusion of the village (as one of a number of smaller villages) in Tier 4. Further site assessment work has included a small part of LP_Payh_03 (Payh_03a) as suitable for a limited allocation of up to 15 homes in recognition of its Tier 4 status and this has been debated through Member Working Group and Strategic Planning Committee. The concerns of local people including in terms of highways were considered. Consideration was also given to increasing the housing numbers at this site but rejected by Members as being beyond the scale that would be suitable in this location. The allocation for 15 homes at Regulation 19 is considered to be proportionate and takes account of the site assessment and advice provided by the Highways Authority.

Development at Service Villages – Plymtree

Draft Plan consultation

Key issues raised in consultation:

- Agents for FW Clarke - We support the change to the settlement hierarchy and the amended distribution strategy. The amended settlement hierarchy includes Local Centres (Tier 3), which encompasses Woodbury, Lypstone, Broadclyst, Colyton and Budleigh Salterton. Tier 4 includes, amongst others, Plymtree. At present, no housing growth is expected at Plymtree at all over the plan period whereas many other Tier 4 settlements are expected to experience some housing growth. We object to the lack of housing growth expected at Plymtree.
- Agents for J Persey -
 - Request for the Plan to allow limited development to meet local needs at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Popleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill and Whimple. The identification of Plymtree as a Service Village is supported. The

Officer commentary in response:

Support for the settlement hierarchy and identification of Plymtree as a service village suitable for additional housing development is noted.

LP_Plym_01 - Agricultural field adjoining the north-west of Plymtree village - *Rejected Site*

- No comments

LP_Plym_02a - Agricultural field adjoining and contained within Plymtree village to the north, east and south - *Rejected Site*

- No comments

LP_Plym_02b - Agricultural field adjoining and contained within Plymtree village to the north, east and south - *Rejected Site*

- No comments

LP_Plym_03 - Land at Plymtree - *Rejected Site, now proposed for allocation at Reg 19*

- This site is now proposed for allocation

LP_Plym_04 - Two agricultural fields between Plymtree village and Norman's Green - *Rejected Site*

village has a good range of facilities (school, shop, pub) and is not environmentally constrained being entirely outside of the AONB. It ultimately has more facilities and is less environmentally constrained than many other villages in the district. It is a perfect village to receive an allocation, and the scale and form of growth can be carefully controlled through local development management policies so that it complements the character of the area and helps meet local needs. Collectively, villages could make a meaningful contribution to the district's overall housing land supply and growth of this type would also have the advantage of diversifying supply, meeting local needs and supporting rural facilities.

LP_Plym_01 - Agricultural field adjoining the north-west of Plymtree village - *Rejected Site*

- No comments

LP_Plym_02a - Agricultural field adjoining and contained within Plymtree village to the north, east and south - *Rejected Site*

- No comments

LP_Plym_02b - Agricultural field adjoining and contained within Plymtree village to the north, east and south - *Rejected Site*

- No comments

LP_Plym_03 - Land at Plymtree - *Rejected Site*

- No comments

Omission sites at Plymtree

- New site presented to west of village hall has been assessed as LP_Plym_05. See below

<ul style="list-style-type: none"> • Bell Cornwell for J Persey - Urges the LPA to provide a formal allocation in Plymtree on the Plym_03 land and have provided further technical information to demonstrate how this could be achieved. <p>LP_Plym_04 - Two agricultural fields between Plymtree village and Norman's Green - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No comments <p>Omission sites at Plymtree</p> <ul style="list-style-type: none"> • New site presented to west of village hall. 	
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>Plym_05 – Land West of the Village Hall - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • The responses to the question about site Plym_05 not being allocated are mixed, with a slight lean towards supporting the decision not to allocate. Many respondents express concerns about the impact on the village's character, infrastructure, and green spaces. However, some see potential benefits in modest development to support local amenities and housing needs. There are also calls for more detailed consideration of design and density if development were to proceed. Key points raised, in order of frequency: <ol style="list-style-type: none"> 1. Environmental and landscape concerns <ul style="list-style-type: none"> ○ Importance of retaining greenfield areas and biodiversity ○ Potential loss of land for food production 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The site is a significant greenfield site, with a rural setting and character, and development would extend built form into the open countryside. The site lies adjacent to a listed Manor House and its formal gardens and there is potential for subterranean archaeology which may require further assessment. It is located on the periphery of the village (albeit the village hall is located beyond it and the site could provide a community benefit in the form of a foot/cyclepath between the hall and existig housing). Allocation of this site, in addition to the preferred allocation, Plym_03 would result in an excessive scale of development given the size and character of the existing village.

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| <ol style="list-style-type: none">2. Infrastructure limitations<ul style="list-style-type: none">○ Lack of road and school infrastructure to support new development○ Insufficient services in the area for additional housing3. Village character and scale<ul style="list-style-type: none">○ Concerns about the proposed development being too large for the village○ Need for appropriate density and design if developed4. Support for non-allocation<ul style="list-style-type: none">○ Agreement with the decision not to allocate the site5. Potential benefits of development<ul style="list-style-type: none">○ Possibility of supporting local amenities like the pub○ Helping to meet housing targets6. Heritage considerations<ul style="list-style-type: none">○ Archaeological potential and proximity to Grade II* Listed Plymtree Manor○ Differing views on impact on the manor's setting7. Alternative development suggestions<ul style="list-style-type: none">○ Proposals for low-rise apartments instead of houses○ Preference for developments targeted at local young people and the elderly8. Conditional support for development<ul style="list-style-type: none">○ Suggestion for smaller-scale development of 20-25 units | |
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Statutory organisations summary
Devon County Council

<p>The site can achieve good visibility access, and local facilities will help mitigate some of the vehicular trip generation.</p> <p>There is a less than daily bus service, so likely to be largely dependent on car-based journeys.</p> <p>Note a possible ring ditch to the south that should be investigated through a planning application.</p> <p>The slightly sloping topography means some inert material may be created, which should be considered in the layout, design, and levels of development.</p> <p>Plymtree primary school could facilitate the proposed level of development, but contributions towards secondary education would be required.</p>	
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Development at Service Villages – Sidbury

Draft Plan consultation	
<p>Key issues raised in consultation:</p> <p>General Issues:</p> <ul style="list-style-type: none"> • Any development at Sidbury is likely to close the gap with Sidford. • Developers should contribute towards a footpath/cycle link from Sidbury to Sidmouth, preferably along the river. <p>LP_Sidm_11 - Burnt Oak (existing garage block), Sidbury - <i>Planning Permission Granted</i></p> <ul style="list-style-type: none"> • This site has already obtained planning permission. Although given the access to the site is on a blind junction 	<p>Officer commentary in response:</p> <p>General issues</p> <ul style="list-style-type: none"> • Support for a footpath/cycle link between Sidbury and Sidmouth is noted and any development that can support the enablement of this connection should do so. • The impact on the Green Wedge is also noted. <p>LP_Sidm_11 - Burnt Oak (existing garage block), Sidbury - <i>Planning Permission Granted</i></p>

on the busy A375 I am surprised that this alone did not lead to the site being rejected when previously considered.

LP_Sidm_25 - Field bordering junction of Cotford Road and Roncombe Lane, Sidbury - *Rejected Site*

- This agricultural site has been submitted for residential purposes to accommodate just under 40 properties.
- The site is situated within the AONB, with landscape visibility, on the edge of Sidbury village outside of its boundary settlement. Access to the site would be either from Roncombe Lane, which is a narrow lane or from the busy A375 at a point where joining it from the site would not be appropriate and potentially dangerous.
- Some or all of the site is contained within Flood Zone 3 and there is high risk flooding along roads adjacent to the site and the development of this site could add to increased storm water runoff will exacerbate downstream flooding.

LP_Sidm_34 - Land south of Furzehill, Sidbury - *Potential 'Second Best' Allocation*

- Historic England - Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Would like to consider further assessment when available.

- This site already has planning permission granted so, therefore, is not proposed for allocation.

LP_Sidm_25 - Field bordering junction of Cotford Road and Roncombe Lane, Sidbury - *Rejected Site*

- This site failed the sifting part of the site selection process for being too remote from the centre of Sidbury.

LP_Sidm_34 - Land south of Furzehill, Sidbury - *Potential 'Second Best' Allocation*

- Part of Sidm_34 (Sidm_34a) has been agreed for allocation by members. There is the potential for part of the rest of the site to be allocated provided the most visually prominent areas are left undeveloped. This expanded scheme would be accessed via A375 and not Furzehill (which would instead be a pedestrian / cycle access only) and also deliver Phase 2 of the DCC multi-use path, enabling the delivery of the entirety of the route from Sidford to Sidbury.

- Developing this site will change the character of Sidbury and close the Green Wedge with Sidford, contrary to Policy 3 in the Neighbourhood Plan and Policy 78 in Draft Local Plan. Particularly with regard to setting of ancient monument and LB.
- DCC suggest access from Furzehill but there is likely to be third party land ownership (“ransom strip”) in this area which creates uncertainty on delivering the site.
- DCC state this site has multiple ordinary watercourses running through it and any proposed development should improve these watercourses and avoid culverting.
- The Town Council does not support the allocation of employment land within the AONB at Sidm_34.
- SVA -
 - This development will change the character of Sidbury and close the Green Wedge with Sidford (contrary to Policy 78 of this draft Local Plan and Policy 3 and Map 9 of the adopted Sid Valley Neighbourhood Plan which seeks to prevent settlement coalescence). - Separately, this Sidbury development proposal provides for 0.15 Hectares of Employment Land but there is no demand for Employment Land – refer to the Sidford Business Park proposal where the land is now for sale due to the property owners’ stated admission that there is ‘no demand for Employment Land’.
 - Additionally, this proposal is contrary to this Draft Local Plan’s Policy 75 as the site is within the AONB

and it will not enhance the AONB. Rather this proposal will be detrimental to the AONB.

- Also, this proposed site is contrary to Policy 3 of the adopted 'Neighbourhood Plan for the Sid Valley 2018- 2032 seeking to avoid 'Settlement Coalescence').
- Sidmouth Cycling Campaign state the potential site for allocation in Sidbury (Sidm_34) encompasses the route of the proposed off-road cycle route from Sidford to Sidbury that Devon County Council are promoting. Construction of this route and links to the adjacent housing should be included as a condition of any planning permission for this site. This would support Strategic Policy 65 and Policy 66
- Agents for Land Value Alliance - In our view, second choice sites such as SIDM_34, which are being relied upon as part of the draft housing supply and distribution should logically and sensibly be identified as preferred allocations. Such a change would also ensure that Sidbury, identified as one of the sustainable villages in the District, is served by an allocation within the Draft Plan, land should be allocated at Sidbury to ensure the local housing need is addressed and there are no other realistic site options capable of accommodating housing to meet the need.
- Proposal for 38 dwellings is not based upon a robust assessment of site capacity.
- No reference in the site assessment to the proximity of Sidbury Castle Scheduled Monument, development will adversely affect its setting.

- We understand the need for additional affordable housing in the area but consider this location and additional housing in Sidbury will have a very serious lasting negative effect on all village folk and its limited infrastructure. For the following critical reasons:
 - a) As indicated above, the existing road system is clearly unable to support additional traffic and this will already be further taxed by the approved new Sidford Industrial Site and the LP_Sidm_1 Sidbury housing traffic.
 - b) Widening / Realignment of the existing road is not an option.
 - c) The small car park located in the centre of the village is generally fully occupied.
 - d) The Village Primary school is operating at maximum capacity with no space for further development of the site.
 - e) Delivery and collection of school pupils is very hazardous' causing significant traffic disruption at times.
 - f) Drainage within the fields is complex with several active springs. At least 4No draining in large volumes into our grounds.
 - g) Provision of adequate access to all new properties will be complex / expensive due to the significant gradient of the sites / drainage plus forming a safe viable access onto the main road.

Omission sites at Sidbury

- None identified

Development at Service Villages – Stoke Canon

Draft Plan consultation

Key issues raised in consultation:

General Issues:

- None identified

LP_Stok_01 - Land lying to the west of Chestnut Crescent, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_02 - Oakhay Barton, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_03 - Imbert Green Technology Park, Stoke Canon - *Rejected Site*

- No comments

LP_Stok_05 - Field 7414, Stoke Road, Stoke Canon - *Rejected Site*

Officer commentary in response:

- No issues were raised in feedback in respect of sites.
- No allocations are proposed at Stoke Canon.

<ul style="list-style-type: none">• No comments <p>LP_Stok_06 - Fields 7425 & 8333, Stoke Road, Stoke Canon - <i>Rejected Site</i></p> <ul style="list-style-type: none">• No comments <p>LP_Stok_07 - Oakhay Barton, Stoke Canon - <i>Rejected Site</i></p> <ul style="list-style-type: none">• No comments <p>LP_Stok_08 - Land and buildings known as Stoke Cottage, Stoke Canon - <i>Rejected Site</i></p> <ul style="list-style-type: none">• No comments <p>LP_Stok_09 - Bridge Farm, Stoke Canon - <i>Rejected Site</i></p> <ul style="list-style-type: none">• No comments <p>LP_Stok_10 - Field 6700 & 6907, Stoke Road, Stoke Canon - <i>Rejected Site</i></p> <ul style="list-style-type: none">• No comments <p>Omission sites at Stoke Canon</p> <ul style="list-style-type: none">• None identified	
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Development at Service Villages – Tipton St John
Draft Plan consultation

<p>Key issues raised in consultation:</p> <p>General Issues:</p> <ul style="list-style-type: none"> • Ottery St Mary Parish Council comment that a site for a new Tipton St John Primary School should be found within the village. • Devon County Council and the County Councillor request that a primary school site is allocated in Tipton as it is identified in the provisional Schools Rebuilding Programme. • The agent acting on behalf of the owners of Site LP_Otry_04 have suggested two alternative schemes, one for housing and one for a relocated school with some self/cusom build housing to ensure that this facility remains in the village. They also support designation as a tier 4 settlement and object to the site being a second, rather than first, choice <p>LP_Otry_04 - Land south of Otter Close, Tipton St John - Potential 'Second Best' Allocation</p> <ul style="list-style-type: none"> • 45 homes on this site would be too dense, out of character with the area. • Highway safety concerns- traffic already speeds here, poor access onto the main Sidmouth to Ottery road, lack of pavements, volume of extra traffic, too close to Otter Close entrance • Impact on sunken lane • Need for extra houses should be demonstrated 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Tipton St John is identified as a Tier 4 settlement on the basis of the range of services and facilities it currently offers. The school is located within a floodplain and will have to relocate in the short term, at which point, if it moves outside Tipton ST John, then the threshold for services will no longer be met and the village will no longer be considered as suitable for further residential development. • On this basis, it is considered that a single site should be allocated for a school and 5 self build dwellings only. • LP_Otry_04 - Land south of Otter Close, Tipton St John - <i>Potential 'Second Best' Allocation</i> <ul style="list-style-type: none"> • It is agreed that 45 homes on this site would be too dense and out of character with the area. Since this was proposed, further work has been carried out and the site is felt to be more appropriate for a new primary school and 5 self build houses. • The site is well screened and located between existing development so the allocation would not impact to an unacceptable degree. • LP_Otry_06 Land next to Coombe Vale, Tipton St John - Rejected Site • It is agreed that the site is considered to be unacceptable due to its impact on the national landscape, ecology and highway safety. <ul style="list-style-type: none"> • Omission sites at Tipton St John • The field at Coombe Bank LP_Otry_22 was subitted for consideration
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- Previous appeal was refused and the reasons remain relevant
- Lack of public transport
- The site is relatively level and is well screened with mature roadside hedging.
- Visual impact is minimised as the plot sits in an area between already established housing developments.
- The school could be relocated to this site, along with some custom/self build houses to ensure that the village remains sustainable and a tier 4 settlement
- If the school relocates to OSM then this site isn't justified and the tier 4 status should be lost as the village is unsustainable

**LP_Otry_06 Land next to Coombe Vale, Tipton St John -
*Rejected Site***

- Will harm the appearance of the AONB and character of the valley, impact on tranquility.
- Unacceptable impact on ecology- cuckoos, barn owls and woodpeckers are on the site.
- The road is a narrow lane already impacted by modern vehicles. Can't be widened as banks are not in applicants' control.
- Access to the main road on the cross roads is already hazardous
- Site is far from the village centre, increasing residents' dependency on cars and contrary to sustainable objectives of the local plan.

- The agent advised that LP_Otry_04 could accommodate the relocated primary school along with a small number of custom/self-build houses.

<ul style="list-style-type: none"> • The proximity of the steep Goyle means that the south part of the land is liable to erosion and subsidence in addition to being part of the flood plain • Will impact on mature trees and a diverse range of habitats and wildlife including wetland, woodland and meadow. • Will increase flooding and run off <p>Omission sites at Tipton St John</p> <ul style="list-style-type: none"> • The field opposite (Coombe Bank) to Site LP_Otry_04 was submitted to the SHLAA in 2015 and should be included as a better development site. Respondent states “We will send supporting documents”. A plan has subsequently been submitted confirming that the land lies to the west of Coombe Bank, adjoining the crossroads • The relocated primary school could be sited on LP_Otry_04 along with a small number of custom/self-build houses. (Submitted on behalf of site owner) 	
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Very few comments were made in relation to this site. In the ‘sentiment’ expressed, the majority of respondents supported rejection of the site. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • LP_Otry_22 is rejected as the site is a greenfield site which would extend into open countryside. There is no other development on this side of the road. Development would be visible from a considerable distance and negatively impact the National Landscape.

Development at Service Villages – Uplyme

Draft Plan consultation

Key issues raised in consultation:

General Issues:

- Lyme Regis Town Council note that no suitable sites have been submitted as yet and request that any that do come forward minimise the impact on Lyme Regis, particularly traffic and parking issues.

LP_Uply_01 - Land at Sidmouth Road, Uplyme - *Rejected Site*

- Uplyme Parish Council is against development of this land and are satisfied that EDDC have taken the same view about the unsuitability of the site.
- Representation on behalf of landowner comment that:
- The land is available for development and could provide around 120 homes with 50% of these being affordable.
- The draft Dorset Local Plan states that more than 20% of the housing stock in Lyme Regis is second or holiday homes resulting in a lack of affordable housing in the town.
- A greater stock of affordable and affordable home ownership products are needed to prevent younger families being forced out of Lyme Regis.
- East Devon and Dorset should cooperate to allocate land for housing as the 40 units allocated in the emerging Dorset plan is insufficient.

Officer commentary in response:

- No allocations are proposed at Uplyme.
- The pressure for affordable housing in the Dorset town of Lyme Regis is recognised, but Uply_01 is not considered to be suitable for allocation.

<ul style="list-style-type: none"> • The East Devon Local Plan should allocate this site to meet the cross boundary needs of neighbouring Dorset Council. • There is no evidence of joint working to address the needs of Lyme Regis under the ‘Duty to Cooperate’; <p>Omission sites at Uplyme</p> <ul style="list-style-type: none"> • None identified 	
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Development at Service Villages – Westclyst

Draft Plan consultation

Key issues raised in consultation:

General Issues:

- Westclyst is not a separate community, it is part of Broadclyst.
- Westclyst relies on nearby Pinhoe and Broadclyst for services and infrastructure as, apart from the school and corner shop, no extra infrastructure has been delivered in Westclyst.

LP_BrcI_01 - Land to the east of Parkside Crescent - *Planning Permission Granted*

- No Comments

LP_BrcI_04 - Land adjacent to Poltimore Park - Rejected Site

Officer commentary in response:

- Westclyst is located in the southwest of Broadclyst Parish, along the B3181 and M5. Historically it was a smaller settlement in the parish, with the growth of residential development and population at Westclyst, it will become one of the largest communities in the parish. It is identified as a T4 settlement. As a tier 4 settlement, Westclyst has a small range of facilities including shops and a primary school, and benefits from the proximity to Pinhoe (in Exeter City) where more facilities can be accessed.

<ul style="list-style-type: none"> Support, the site should be rejected as development would increase the flood risk and reduce the land for nature in the area. <p>LP_Polt_03 - Land to the north of Old Park Farm, Pinn Hill - Rejected Site</p> <ul style="list-style-type: none"> Support, the site should be rejected, as building in a flood zone would be foolish, and it would have an adverse effect on Poltimore Park. It would be better to build on brownfield sites. <p>Omission sites at Westclyst</p> <ul style="list-style-type: none"> None identified. 	
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Development at Service Villages – West Hill

Draft Plan consultation	
<p>Key issues raised in consultation: General</p> <ul style="list-style-type: none"> West Hill PC state the village has had significant growth of more than 10% since the start of the current Local Plan in 2013 and is being burdened by with disproportionate levels of housing. 	<p>Officer commentary in response: General</p> <ul style="list-style-type: none"> West Hill is a ‘service village’ in the emerging Local Plan and, consistent with the spatial strategy for limited development to meet local needs, should not see a disproportionate level of housing. Many of these general issues relate to a lack of infrastructure to support new housing development, such as transport, education, healthcare, and sewerage. These matters will be considered in the forthcoming

<ul style="list-style-type: none"> • West Hill PC and residents are concerned about infrastructure inadequacies such as over capacity of schools, health services, highways, water supply, sewage and inadequate open space and recreation facilities. • West Hill PC note the outskirts of the village are a considerable distance from the village centre facilities, exacerbated by the hilly nature of the lanes which have no footways or street lighting – further development here would not be sustainable. • West Hill PC state it is very important that a Green Wedge covers the entire area of Neighbourhood Plan Policy NP4 to prevent coalescence and preserve the separate identities of Ottery and West Hill. • 57 homes are just about manageable, but the planning application for site at Oak Road is unsustainable and would be unacceptable in addition. • Many of the sites in the HELAA are in “valued views” protected by policy NP6 in the Neighbourhood Plan so are not suitable for development. • Important to have mixed use development with some affordable homes to attract younger people. • Retain West Hill as it is to preserve a jewel in the landscape where people and wildlife cohabit. • As there has been no recent increase in employment in West Hill, any new residents will be forced to commute elsewhere to work. • The River Otter has a phosphate issue which must be addressed before development. 	<p>Infrastructure Delivery Plan which will highlight key infrastructure issues and how they should be addressed to deliver development proposed in the Local Plan.</p> <ul style="list-style-type: none"> • Agree that the distance, topography, lack of street lighting, and lack of footpaths means that new development to the south of the village would discourage walking and cycling, so not recommended for allocation (including the Oak Road planning application). • The Further Draft Local Plan consultation (May-June 2024) includes the area covered by Neighbourhood Plan Policy NP4 in the Green Wedge. • Neighbourhood Plan “valued views” are noted in the site assessment where they affect individual sites. • The limited employment opportunities in West Hill means that new housing should be limited to minimise out-commuting. • Whilst Natural England has identified a phosphate issue at the River Axe, this is not the case for the River Otter. <p>LP_GH/ED/23 - Land lying to the south of Holyfield - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • This site is rejected as not adjacent, or well-related, to West Hill. <p>LP_West_01 - Land at Westhayes / Hayes End, Eastfield - <i>Potential ‘Second Best’ Allocation</i></p> <ul style="list-style-type: none"> • The Council’s mapping software does not show surface water flood risk at the site and immediate surrounds. • The woodland, wildlife and TPO constraints reduce the site area to below the threshold for allocations, so this site should not be allocated. <p>LP_West_02 - Field at junction adjacent to Prickly Pear House (at junction of B3180 Exmouth Road and Bendarroch Road, West Hill) - <i>Rejected Site</i></p>
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LP_GH/ED/23 - Land lying to the south of Holyfield - *Rejected Site*

- This site is too far from facilities.
- Developing this site would remove the existing green corridor between West Hill and Ottery.
- This will increase car traffic along narrow single track lanes.
- Building here will increase surface water run-off and flood risk to Ottery lower down the hill.

LP_West_01 - Land at Westhayes / Hayes End, Eastfield - *Potential 'Second Best' Allocation*

- DCC state that nearby land has been associated with surface water flooding, and it is currently unclear whether there is a feasible discharge point for this site.
- West Hill PC note mixed views from residents, some see it as appropriate for low density development if existing trees are protected, others value the wooded land, wildlife, and screening from the busy B3180.
- A developer (Morrish Homes) objects as part of site is protected as s.41 habitat, TPOs, Nature Recovery Site.
- A developer (Morrish Homes) states this site should not be considered available until the landowner can demonstrate that necessary rights are in place for access and connection of services.

- The valued view in the NP is noted in the landscape sensitivity assessment of this site.
- The site has a high/medium landscape sensitivity, there is limited context of built form and West Hill itself. The route to community facilities lacks pavement and street lighting along most of the route.

- LP_West_03 - Rear of Hasta-La-Vista, Windmill Lane - *Rejected Site Noted.*

LP_West_04 - Land adjoining Windmill Lane - *Preferred Allocation*

- Surface water run-off concerns are noted, but the Council's mapping software (which uses the EA flood map) does not show surface water flood risk at the site and immediate surrounds. In any case, this issue should be addressed in more detail through a planning application.
- DCC Highways state the junction between Windmill Lane and Bendarroch Road is adequate.
- Wildlife impacts have been considered in the site assessment, which concludes a minor adverse ecological effect.
- The landscape sensitivity assessment concludes a medium impact, so not considered to be a reason by itself to not allocate the site.

- A developer (Morrish Homes) objects due to proximity to busy road (B3180) causing noise.
- Object as future house owners will want to remove trees due to loss of light and for fear of damaging their house.
- Support this site, tree removal can be avoided in a similar way to previously approved schemes such as Hayes End.
- Object as topography means that developing this site will cause overlooking of neighbouring properties.
- Object as development will lead to flooding of lower neighbouring gardens.
- Object as site is home to much wildlife such as owls, buzzards, bats.

LP_West_02 - Field at junction adjacent to Prickly Pear House (at junction of B3180 Exmouth Road and Bendarroch Road, West Hill) - *Rejected Site*

- West Hill PC object due to high landscape impact, forming one of the valued views in Neighbourhood Plan Policy NP6.
- The site owner supports allocation of the site. In summary, he states that it performs similarly to the preferred options other than in landscape impact and access to services. Landscape impact can be mitigated by a landscaping scheme, long and mid range views are blocked by existing trees and development would be seen in context of existing built

- The pedestrian route to the school along Bendarroch Road-Moorlands-Beech Park is 750m, but the allocation policy can require pedestrian/cycle access through the adjacent site Wood_18 (previously known as Wood_06) to the east, making the route much shorter and more attractive for walkers and cyclists.
- The supporting points for this site are noted and agreed with.
- West Hill is a 'service village' in the emerging Local Plan and, consistent with the spatial strategy for limited development to meet local needs, should not see a disproportionate level of housing.

LP_West_05 - Land off Oak Road - *Rejected Site*

- DCC did not object to the site on minerals issues in comments on the HELAA.
- The council has not seen evidence of the restrictive covenant limiting development to two dwellings – if true, this would adversely affect the achievability of this site.
- The site assessment notes the TPO covers the entire site boundary.
- Poor pedestrian access to facilities is a key reason for not allocating the site.
- The southern half of the site is located within the medium and outer zones associated with a high pressure gas pipeline, but the developer states this

form. The site is a similar distance from services as the preferred sites and a pedestrian link can be provided.

- This could be a suitable site as long as there is no through road from Eastfield and the adjacent junction on the B3180 is improved.

LP_West_03 - Rear of Hasta-La-Vista, Windmill Lane - *Rejected Site*

- West Hill PC object due to high landscape sensitivity, with previous planning applications and appeals dismissed on these grounds.
- Access will be suitable if old dangerous tree was removed as per recent tree report.

LP_West_04 - Land adjoining Windmill Lane - *Preferred Allocation*

- DCC note the concerns of residents over surface water run-off to the east of this site, so a robust drainage strategy will be required.
- DCC state this site seems to be very steep so infiltration will need to be considered very carefully.
- West Hill PC and residents main concern is traffic impact as Windmill Lane is narrow and not suitable to provide access.
- Object due to poor visibility from exit to Bendarroch Road, where cars go too fast making it unsafe for pedestrians.

issue can be resolved – this is not given as a reason for not allocating the site.

- The site assessment concludes a significant moderate adverse ecological effect due to the presence of numerous mature trees (subject to TPO), only 17m beyond the Pebblebed Heaths SPA exclusion zone, and entire site is covered by an unconfirmed wildlife site (UWS) – possible unimproved grassland.
- Highways access can be achieved through a new access access that provides suitable capacity and allows the appropriate level of visibility.
- High-medium landscape sensitivity to development, including because site is partly covered by a “key viewpoint” identified in the NP.
- A slither of surface water flood risk is located NE of the site.
- Nb. This site is now known as West_20 in the West Hill Site Selection report.

LP_West_06 - Land north and east of Eastfield - *Preferred Allocation*

- Surface water flooding concerns are noted, but the Council’s mapping software (which uses the EA flood map) does not show surface water flood risk at the site and immediate surrounds. In any case, this issue should be addressed in more detail through a planning application.
- DCC Highways are content with the access and traffic impact.

- Support developing this site but should be at a density comparable with surrounding properties to maintain a village character.
- Object as surface water runs off the field to Windmill Lane which cannot cope.
- Local residents have commissioned a flood risk screening report which concludes that surface water flooding affects the southern part of West_04 and across to West_06 – the EA’s surface water flood map showing a very low risk of surface water flooding is not accurate.
- Concern about the adverse impact on wildlife, including deer, bats and owls.
- Object as there are TPOs on all trees along with border.
- Object as it will devalue my house.
- Application for two dwellings (13/2624/FUL) in northern part of site was dismissed at appeal as harmful to character and appearance of the area, so do not understand how it can now be preferred.
- A developer (Morrish Homes) objects given the long route for pedestrians to facilities along un-paved and unlit roads, with no guarantee that access could be provided through West_06.
- A developer (Morrish Homes) objects due to adverse landscape impact.
- Support allocation as will round off the development area.

- Agree to increase the yield to 30 dwellings following the grant of planning permission subject to s.106.
- Issues relating to the provision of on-site employment are addressed in Strategic Policy 5.
- The site assessment notes woodland in northern part of the site and adjacent to south west, and numerous mature trees along site boundary, many of which are subject to TPOs, concluding a significant moderate adverse ecological effect.
- Support for development, close to facilities, is noted.
- Nb. This site is now known as West_18 in the West Hill Site Selection report.

LP_West_07 - Land at Lower Broad Oak Road - *Rejected Site*

- The valued view is and distance to facilities are noted in the site assessment and included in the reasons for not allocating the site.

LP_West_08 - Land adjacent to Badgers Bend, Lower Broad Oak Road - *Rejected Site*

- These issues are reasons why the site is not allocated.

LP_West_09 - Land adjoining The Gap, Lower Broad Oak Road - *Rejected Site*

- These issues are reasons why the site is not allocated.

- Support this site as easy access to B3180 and A30.
- Support as close to facilities through the adjacent Moorlands estate.
- There have been large developments in this area of West Hill over recent years, and not fair to add more in the same area.

LP_West_05 - Land off Oak Road - *Rejected Site*

- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.
- West Hill PC object due to restrictive covenant limiting any development to two dwellings.
- West Hill PC and residents object because of impact upon TPO covering the site boundary and on-site tree.
- West Hill PC and residents object due to significant distance from village centre along hilly lanes with no footways or street lighting.
- West Hill PC object because Oak Road access is a “valued view” in the Neighbourhood Plan.
- West Hill PC object as within high pressure gas pipeline middle/outer zones.
- The agent for the site owners objects to the failure to allocate the site. The assessments are not consistent, this site ranks similarly to preferred sites in many respects. Many sites are subject to minerals constraints but this is not recorded, other sites are further away from facilities and contain TPO’d trees but

LP_West_11 - Land adjacent to Hilden, Lower Broad Oak Road - *Rejected Site*

- This site is probably unachievable in the HELAA due to access constraints.

LP_West_12 - Hollybrook Nursery, Exmouth Road - *Rejected Site*

- This site is not within or adjacent, or otherwise well-related, to West Hill, so does not pass site sifting.

LP_West_13 - Weggis Farm - *Rejected Site*

- This site probably unachievable in HELAA due to mineral constraints, but DCC subsequently removed their objection in stating that Oak Road forms a more logical boundary to the Mineral Safeguarding Area. However, southern part of site is within 400m Pebblebed Heaths exclusion zone, and only north east tip of site is adjacent to existing settlement boundary- this combination of reasons means site does not pass sifting stage.

LP_West_14 - Pikes Farm - *Rejected Site*

- This site probably unachievable in HELAA due to mineral constraints, but DCC subsequently removed their objection in stating that Oak Road forms a more logical boundary to the Mineral Safeguarding Area.
- Poor pedestrian access to facilities is a reason for not allocating the site.
- Southern half of the site is located within the medium and outer zones associated with the high pressure gas pipeline.

rank higher. It is disputed that the site appears as open countryside.

- A developer (Morrish Homes) objects to non-allocation of this site, noting technical reports on transport, trees, ecology and landscape in current planning application 22/2533/MOUT show the site is suitable.
- A developer (Morrish Homes) notes that Devon County Council has withdrawn its minerals objection.
- A developer (Morrish Homes) states that there will be no 'category 3 or 4' development within the site, so the Health and Safety Executive will not advise against development, so this constraint no longer applies.
- Object as unacceptable wildlife impact, including proximity to East Devon Heaths SPA/SAC, rare moths and three very rare bats.
- Contrary to Neighbourhood Plan.
- Object as Oak Road is a single track lane, dangerous to add more traffic.
- The exit onto the B3180 is on a blind bend and extremely hazardous.
- The bottom of this field is a bog and would require water pumps to drain it.
- The pebble bed ground is unstable for development.
- Development will cause unacceptable landscape impact.
- Not clear whether the current surface water run-off that affects part of Higher Broad Oak Road will be exacerbated.

- The landscape sensitivity assessment concludes a high-medium landscape sensitivity to development, including because of its location within protected view WH3 designated in the NP, a reason for not allocating the site.

LP_West_15 - Flower Cottage, Elsdon Lane - *Rejected Site*

- The council has not seen the restrictive covenant, but the other issues are reasons why the site is not allocated.

LP_West_16 - Elsdon House, Elsdon Lane - *Rejected Site*

- Noted – these are reasons not to allocate the site.

LP_West_17 - WI Building and adjoining land, West Hill Road - *Rejected Site*

- This site does not pass site sifting as area outside surface water flood risk (approximately 0.05 ha) is below site size threshold.

- Facilities are well over the 1km quoted in the site assessment: should state 1.6km to shop/PO; 1,7km to school, village hall; 2km to main bus route, British Legion; 2.2km to church; 2.3km to garage, dentist and hairdresser.

LP_West_06 - Land north and east of Eastfield - Preferred Allocation

- DCC state this site seems to be very steep so infiltration will need to be considered very carefully.
- West Hill PC have concerns regarding traffic impact due to narrow roads.
- West Hill PC are concerned about flooding from the many springs and aquifers in the site.
- Blue Cedar Homes control this land and support its allocation but should be increased to 30 dwellings – there are no constraints and intend to submit planning application in next few months.
- Blue Cedar Homes object to 0.1 ha employment land as there is no justification for this.
- A developer (Morrish Homes) objects as uncertain whether access can be obtained via Eastfield Gardens.
- A developer (Morrish Homes) objects due to presence of TPOs, potential impact upon root protection areas and may be pressure to remove trees by future residents.

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| <ul style="list-style-type: none">• A developer (Morrish Homes) notes this site formed part of a larger site that was dismissed at appeal in 2011 (APP/U1105/A/11/2155312) due to adverse landscape impact.• Support developing this site but should be at a density comparable with surrounding properties to maintain a village character.• Local residents have commissioned a flood risk screening report which concludes that surface water flooding affects the southern part of West_04 and across to West_06 – the EA’s surface water flood map showing a very low risk of surface water flooding is not accurate.• There is a protected copse and oak tree in the north eastern corner – will this be cleared?• Concern about the adverse impact on wildlife, including deer and owls that nest in the trees.• Part of larger site dismissed at appeal (10/0761/MOUT) so do not understand why it’s now appropriate to allocate.• Any link between West_04 and West_06 will create a rat-run.• Very good location for development, close to local amenities.• Access from Eastfield Orchard is narrow and often obstructed by parked vehicles. | |
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- There have been large developments in this area of West Hill over recent years, and not fair to add more in the same area.
- House prices mean that local need is not being met.

LP_West_07 - Land at Lower Broad Oak Road - *Rejected Site*

- West Hill PC object due to restrictive covenant preventing development;
- West Hill PC object as a “valued view” in the Neighbourhood Plan;
- West Hill PC and residents object due to significant distance from village centre along hilly lanes with no footways or street lighting.

LP_West_08 - Land adjacent to Badgers Bend, Lower Broad Oak Road - *Rejected Site*

- West Hill PC object as a “valued view” in the Neighbourhood Plan.
- West Hill PC object as high landscape sensitivity.
- West Hill PC object as site is covered by a TPO.
- West Hill PC object as boggy site with surface water flood risk.
- Access is along narrow, twisty, and hilly roads with no pavements, causing a safety risk for pedestrians and cyclists.

LP_West_09 - Land adjoining The Gap, Lower Broad Oak Road - *Rejected Site*

- West Hill PC object due to high landscape sensitivity.
- West Hill PC object due to surface water flood risk.
- Access is along narrow, twisty, and hilly roads with no pavements, causing a safety risk for pedestrians and cyclists.

LP_West_11 - Land adjacent to Hilden, Lower Broad Oak Road - *Rejected Site*

- West Hill PC object as site is inaccessible along an unmade track, remote from village.

LP_West_12 - Hollybrook Nursery, Exmouth Road - *Rejected Site*

- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.
- West Hill PC object as remote from village; dangerous access onto the B3180.

LP_West_13 - Weggis Farm - *Rejected Site*

- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.

- West Hill PC object as significant distance from village centre along hilly lanes with no footways or street lighting;
- West Hill PC object as access onto Oak Road is a “valued view” in Neighbourhood Plan;
- West Hill PC object as within high pressure gas pipeline middle/outer zones;
- West Hill PC object as in a Mineral Safeguarding Area.

LP_West_14 - Pikes Farm - *Rejected Site*

- DCC welcome the rejection of this site as it is located within or close to a Mineral Safeguarding Area or Mineral Consultation Area.
- West Hill PC and residents object as significant distance from village centre along hilly lanes with no footways or street lighting.
- West Hill PC object as within high pressure gas pipeline middle/outer zones;
- West Hill PC object as within Mineral Safeguarding Area.
- Planning and Design Group on behalf of landowner recommends allocation as not in a protected landscape and surrounded by large mature trees so minor landscape impact; on-line shopping and high fuel prices mean people are travelling less by car, making pedestrian access less important; proximity to high pressure gas pipeline does not preclude development.

- Landowner states this site has 7 out of 12 facilities within 1,600m, one more than the preferred allocations.
- Object as site is attractive agricultural land, covered by the “valued views” in Neighbourhood Plan Policy NP6.

LP_West_15 - Flower Cottage, Elsdon Lane - *Rejected Site*

- West Hill PC object due to restrictive covenant preventing housing.
- West Hill PC object as access is required over land owned by another individual.
- West Hill PC object as adverse landscape sensitivity due to woodland and open land in centre of village.
- Concerned about surface water run-off affecting homes below the site.

LP_West_16 - Elsdon House, Elsdon Lane - *Rejected Site*

- West Hill PC object as woodland is a Local Green Space in the Neighbourhood Plan Policy NP5 and covered by a TPO.

LP_West_17 - WI Building and adjoining land, West Hill Road - *Rejected Site*

- West Hill PC note this site was dismissed at appeal, and object as it is a “valued view” in the Neighbourhood Plan forming part of the approach to West Hill from Ottery.

<ul style="list-style-type: none"> • West Hill PC object due to surface water flood risk. • Adjacent to a sewage pumping station and therefore not desirable for residential use. • Site can probably only accommodate three dwellings. <p>Omission sites at West Hill</p> <ul style="list-style-type: none"> • None identified. 	
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Development at Service Villages – Whimble

Draft Plan consultation

<p>Key issues raised in consultation:</p> <p>General Issues:</p> <ul style="list-style-type: none"> • Whimble Parish Council highlight a desire for the village to remain separate from Cranbrook and for no further land between the settlements to be developed. The Parish Council point out the single track elements of the highway network and the potential for an increase in housing to exacerbate existing problems. They also raise concerns about confusion over the level of housing development proposed for the village. Evidence from the neighbourhood plan is cited that residents do not wish to see more than 10 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Concerns about the scale of development are noted and the option of Whimble acting as a strategic growth hub has not been pursued in the Regulation 19 Plan. Instead, Whimble is designated as a service village where limited development is encouraged. The percentage increase in homes as a result of the allocation of 83 dwellings is around 14%. This is compatible with the local plan strategy and is a lower percentage increase than some of the other service villages. • Most of the green wedge has been retained, with the exception of one allocation. • A community orchard is encouraged in the plan. • Devon County Council highways has no objection in principle to the proposed allocations.
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new properties and these should provide small clusters focused on affordable housing and for local young people.

- The Environment Agency advises that Whimble has a long history of flooding and has a need for additional flood management infrastructure. Any development which satisfies the sequential and exception tests will be expected to contribute to helping to reduce flood risks overall for the community.
- The Environment Agency advise that all the preferred and second-choice sites here have some degree of FZ3 and/or FZ2 present within them. These sites would need to be subject to SFRA2, and the sequential and exception tests before being allocated.
- DCC state the SUDS hierarchy should be followed, all off-site surface water discharges from development should mimic “greenfield” performance – see CIRIA SUDS manual and LLFA guidance.
- Protect our Whimble and Rockbeare Group (POW+R) have the guiding principle of self-determination for the citizens of the Parish of Whimble as expressed through the neighbourhood plan that it is preparing with the Parish Council.
- POW+R believe that the parish of Whimble has contributed sufficiently to the housing needs of East Devon through the 500 homes allocated in the parish through the Cranbrook Plan.
- POW+R is concerned that development to the west of Whimble would jeopardise the green wedge between Cranbrook and Whimble.

- **LP_Whim_08 - Land west of Church Road and Bramley**

- Part of this site is allocated for 50 dwellings.
- Additional evidence of flood risk is required.
- **LP_Whim_11 - Land at Station Road**
- This site is allocated for 33 dwelling.
- A level 2 Strategic Flood Risk has been undertaken
- The allocation requires layout and design to take account of impacts on heritage, landscape and transport.
- No other sites are allocated.

- POW+R consider the maximum number of swellings each 5 years should be 10 with 50% of these being affordable.
- POW+R set out historical background to orchards and wish to retain them.
- More than 500 homes should be built as villages have always provided an array of services – the original form of sustainability.
- Should not be trying to push new houses through with a new local plan as the existing local plan is still valid.
- Whimple can support some new development to strengthen the community but more than 20 would put too much strain on local services.
- Several respondents supported up to 50 new homes and felt that more would be unacceptable for a number of reasons including, would go against draft policies, road infrastructure, should preserve greenfield sites and unsustainable for local infrastructure.
- Several respondents felt that no more homes should be built for a variety of reasons including, contrary to neighbourhood plan, very car dominant with poor train service, will change character of area, lack of services, no demand for new homes, impact on flooding and wildlife, loss of traditional orchards and facilities and poor, single track roads.
- Train service is infrequent.
- No more than 10 homes should be built together to keep a vernacular appearance and avoid estates.

- Don't build to west of village to keep separation with Cranbrook.
- Whimble Parish Council asked for residents' comments to be carefully considered and highlighted a desire to remain separate from Cranbrook.
- The Parish Council expressed concern about the single track road network serving the village and the poor road surfaces.
- Absorption of Whimble into greater Exeter should be avoided.
- The Parish Council also raised confusion over the number of new homes proposed for the village and stated that neighbourhood plan surveys showed that residents wanted no more than ten new homes in small clusters to support younger people in need of affordable homes.
- Concerns around the capacity of the roads accessing the village (all have significant lengths of single-track width with no footways or lighting) and
- Development sites options will impact on the rural buffer between the village and the planned extension of Cranbrook.
- Several respondents were concerned about flooding.
- Several residents were concerned about the ability of the road network to accommodate additional traffic.
- Sewerage system already at capacity.
- Open green spaces should be protected.
- Whimble needs protecting even though it's not in an AONB.

- Only one shop and a lack of facilities in the village mean no more development.
- Small development should be allowed at Daisymount.
- Development should be kept west of the M5.
- Any further development should benefit the village for example by providing a foot/cycle path to the Hand and Pen.
- Unique character of village must be preserved – people have chosen to live in a village, not a town.
- An increase in population of up to 10% is acceptable, but should be phased over time and change should happen organically.
- A new school should be built, and Church Road improved before any more development.
- Opportunities should be provided for small businesses along old A30.
- Cranbrook already meets need for new houses in this area.
- Orchards are priority habitats under the UK's Biodiversity Action Plan – the orchard next to Bramley Gardens provides habitat for little owls, green woodpeckers, Greater spotted woodpeckers, tree creepers and tawny owls, all of which use the old apple trees to nest in and feed on.
Several species of bats have been seen in the summer.

**LP_Whim_03 - Land to the south side of Grove Road -
*Potential 'Second Best' Allocation***

- DCC note this site falls within the Whimble Critical Drainage Area which means this catchment needs to be protected from development pressures.
- Increased flood risk to surrounding properties.
- Lack of open space in village.
- Sewerage system already at capacity.
- Increase traffic along narrow roads.
- Loss of rural character

LP_Whim_04 - Hits Farmhouse, Lilypond Lane - *Rejected Site*

- No comments

LP_Whim_07 - Land fronting Broadclyst Road - *Potential 'Second Best' Allocation*

- DCC note this site falls within the Whimble Critical Drainage Area which means this catchment needs to be protected from development pressures.
- Site floods.
- Sewerage system already at capacity.
- Loss of historic orchards.
- Small site but would extend village edge so not appropriate for development.

LP_Whim_08 - Land west of Church Road and Bramley Gardens - *Potential 'Second Best' Allocation*

- Forms part of important green wedge separating Whimble from Cranbrook.
- Sewerage system already at capacity.

- Increase traffic along narrow roads.
- Loss of historic orchards.
- Agree part of site could be developed using existing access from Bramley Close, but development should not extend up to Church Road so that feel of village is preserved.
- Relief road should link Bramley Close to Church Road and a large station car park provided.
- Loss of rural character.
- Risk to school children from additional traffic as no footway along many village roads.

LP_Whim_09 - Land at Church Road and Woodhayes Lane - *Rejected Site*

- No comments

LP_Whim_10 - Land adjoining Woodhayes Country House - *Rejected Site*

- No comments

LP_Whim_11 - Land at Station Road - *Preferred Allocation*

- The Environment Agency advise that part of the site is at risk of flooding and an appropriate buffer should be set aside for green infrastructure and kept free from built development and to provide biodiversity net gain.
- Historic England- Further to our initial assessment of the proposed sites it would be helpful to see the full HESA of this proposed allocation to enable one to determine

whether it can be reasonably demonstrated that it is likely to be able to accord with national policy, guidance and legislation including the Planning (Listed Buildings and Conservation Areas) Act 1990. Would like to consider further assessment when available.

- DCC note this site falls within the Whimble Critical Drainage Area which means this catchment needs to be protected from development pressures.
- POW+R note previous designation as land of local landscape importance and wish to keep as green space, preferably with public access.
- Object as this area of land has been designated for recreational purposes linked to Richard Whiteway Memorial Land, a key person in Whimble's history.
- Contrary to Neighbourhood Plan as development is for over 10 dwellings.
- No evidence of a need for 33 homes in Whimble.
- Substantial harm would be caused to Grade II listed Slewtton House.
- The mature hedgerows, trees, grassland, and meadow support abundant wildlife and must be protected.
- DEFRA website shows the site and north east of site as Woodland Priority Habitat and Woodland Improvement Area, Priority Habitat (woodland and orchard), and a national habitat and network enhancement zone 1.
- Development would be harm the landscape, including trees, watercourse, setting of houses on Talaton Road and tranquility, wildness, intactness and enclosure.

- The site is a key local viewpoint and open space – development would harm views.
- All access routes are narrow country lanes, so development would exacerbate existing problems of safety, congestion, noise and impact on amenity and historic environment.
- Site is in a critical drainage area and development would cause flooding off-site.
- Memorial grounds great village asset and of local landscape importance.
- Traffic issues and lack of footways.
- Villages have always rejected building on this site, including a petition signed by 425 people in 1988.
- Designated as land of local landscape importance.
- Parish Council withdrew its nomination as its 'preferred site' in 2015.
- Insufficient open space for village and site meets open space criteria.
- Considered unsuitable for development in 1995 due to traffic and environmental issues.
- Site floods.
- Should be kept for wildlife or used as open space.
- Field acts as dark sky zone.
- Inadequate sewerage system.
- Designated Land of Local Amenity Importance in 1999 in local plan.
- Land to north designated national wildlife site.
- Loss of rural character.

- Regret loss of open area but makes sense to build here if accept need for 10% growth.
- Tree in middle of old cricket pitch is unique, mentioned in Wisden and should be preserved as of historic importance.
- Walking/cycling track should be provided to link with other tracks.
- Logical development site that would not result in loss of agricultural land since it was previously a cricket ground.
- Relatively small site that has not been in use since cricket on the site ceased and likely to remain unused. Also surrounded by housing and acceptable for development.
- A number of respondents noted that 500 homes had been allocated in the parish for Cranbrook and felt that this was sufficient.
- Need homes for local working people – many adult people living with their parents.

LP_Whim_12 - Land at Lillypond Lane - *Rejected Site*

- No comments

LP_Whim_13 - Land north of Grove Road - *Potential 'Second Best' Allocation*

- DCC note this site falls within the Whimple Critical Drainage Area which means this catchment needs to be protected from development pressures.
- Increased flood risk to surrounding properties.
- Lack of open space in village.
- Sewerage system already at capacity.
- Increase traffic along narrow roads.

<ul style="list-style-type: none"> • Loss of rural character <p>LP_Whim_14 - Land at Perriton Barton - <i>Rejected Site</i></p> <ul style="list-style-type: none"> • No comments <p>LP_Whim_18 - Field between Orchard Lea and Church Road - <i>New Site - not assessed</i></p> <ul style="list-style-type: none"> • No comments <p>LP_Whim_19 - Hitts Farm, Lillpond Lane - <i>New Site - not assessed</i></p> <ul style="list-style-type: none"> • DCC note this site falls within the Whimble Critical Drainage Area which means this catchment needs to be protected from development pressures. <p>LP_Whim_20 - Orchard Lea - <i>New Site - not assessed</i></p> <ul style="list-style-type: none"> • No comments <p>Omission sites at Whimble</p> <ul style="list-style-type: none"> • None identified. 	
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<p>Policy omissions from what in the Reg 19 Publication plan is Chapter 5</p>
<p>Main issues raised in consultation that highlight policy omissions from Chapter 6.</p>
<p>Draft Plan consultation</p>

Key issues raised in consultation:

Sites suggested at other settlements

Some consultation responses propose sites for development at settlements not contained in Chapter 6 - I.e., not identified as a Principal Centre, Main Centre, Local Centre or Service Village. The following bullet points summarise the main issues raised in these site-specific responses, by settlement.

Colyford

- Developer (Baker Estates) proposes land at Colyford (Coly_05 and Coly_07) for development, noting that the full extent of these sites would be disproportionate to the size of the settlement, but smaller-scale development should be considered.

Cowley

- Allocate land at the A377 at Cowley for Park and Ride (policy 66) and affordable housing to meet local need and that of key workers (plan attached to JLL response).
- Upto_04

Talaton

- Concerned that Tala_13 has been overlooked as not shown on the Commonplace interactive map despite being in HELA

Upottery

- Developer states Land at Manor Green, Upottery (0.2 hectares) should be allocated for up to five dwellings, a

Officer commentary in response:

- These sites fail site sifting as they are not located within or adjacent to a settlement identified in the settlement hierarchy. Therefore, they are not allocated for development.

<p>highly suitable site for a range of reasons including accessible location, will not extend into the countryside, no heritage or ecological constraints.</p> <p>Venn Ottery</p> <ul style="list-style-type: none"> Concerned that Newt_20 has been overlooked as not shown on the Commonplace interactive map despite being in HELAA. <p>Woodbury Salterton</p> <ul style="list-style-type: none"> Concerned that Wood_45 has been overlooked as not shown on the Commonplace interactive map despite being in HELAA. 	
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>Several additional sites were submitted during this consultation which the council were not previously aware of. These sites are included in this “Further ...” section in the settlement tables.</p>	

11 Conclusions

11/1 This report summarises comments received on sites and provides officer feedback.