

East Devon Local Plan – Topic Paper

Chapter 4. Development at the West End

Audit trail local plan evolution document and consultation statement

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Contents

1	Introduction.....	4
2	The Publication draft of the Local Plan	4
3	Summary of proposed redrafting of Chapter 4 of the consultation plan	4
4	Issues and Options consultation	4
5	Draft plan consultation	5
6	Further Regulation 18 consultation Spring 2024.....	5
7	Sustainability Appraisal feedback	5
8	Habitats Regulations Assessment	5
9	Assessment of policies in Chapter 5 (now renamed Chapter 4).....	5
10	Conclusions.....	127

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 4 of the plan – future growth and development on the western side of East Devon. It should be noted that in the Regulation plan the equivalent plan chapter was Chapter 5.

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 of Chapter 4 of the consultation plan

- 3.1 Chapter 4 of the Publication draft of the local plan has retained the same basic shape and format of that in the draft plan though it has been lengthened through inclusion of a number of policies specifically allocating additional employment sites for development.

4 Issues and Options consultation

- 4.1 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.

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

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

4.2 Comments of relevance received are addressed in this report.

5 Draft plan consultation

5.1 In the draft plan consultation what was Chapter 5 formed one of the plan chapters that was consulted on. A full feedback on the consultation can be viewed at - [accessible-reg-18-consultation-feedback-report-spring-2023.pdf](#) ([eastdevon.gov.uk](#))

5.2 Comments on matters raised and officer responses are set out in the table below. Noting a number of challenges to plan policy, especially in respect to levels of proposed development and specific sites allocated to accommodate growth.

6 Further Regulation 18 consultation Spring 2024

6.1 In the late Spring of 2024 there was further Regulation 18 consultation on selected topic matters. Feedback comments are included in this report.

7 Sustainability Appraisal feedback

7.1 The draft local plan was supported by a Sustainability Appraisal³ (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 Habitats Regulations Assessment

8.1 The local plan will need to be assessed under the Habitat Regulations. An preliminary assessment of policies in the draft plan has been produced – [east-devon-local-plan-hra-110723-2013-doc-from-footprint.pdf](#) ([eastdevon.gov.uk](#))

9 Assessment of policies in Chapter 5 (now renamed Chapter 4)

9.1 Chapter 5 (as was) of the draft plan set out a series of policies that are reviewed below.

³ [sa-of-pos-consultation-draft-lp_2022.pdf](#) ([eastdevon.gov.uk](#))

General issues raised on Chapter 5

Chapter 5 of the plan addresses the western side of the district, close to Exeter, and the significant development proposals in the draft plan for this area. There were many responses to the plan that were opposed, in general, to the overall scale of growth for the western side of the district but also there were responses that endorsed the broad strategic approach (these especially from the development industry where promoting land for development in this area). These overarching comments are highlighted in feedback on plan strategy, as well as being touched on in this section of the report. This section, however, majors on comments that relate to specific proposal and policies for the western side of East Devon.

Issues and options consultation

In the feedback report there was specific reference to the issues of a focus of development on the West End of the district. In response to a question on where development should be located there was most support for a pattern of development that aligns with current approaches or more west end focussed development, rather than lesser support for west end development. Drawing from the feedback report the text advises (first in respect of supportive comments of more west end development):

More West End focussed

- West End proportion of development should be 70%, with remainder to three main towns and minor targets for smaller towns and villages.
- The West End should have 80%+ of new housing, no large development of villages should be allowed.

Officer commentary in response:

- The higher levels of feedback support for more rather than less west end focussed development are noted. Though it is fully recognised that valid challenges and concerns have been highlighted.
- It is noted that some respondents favoured particularly high levels of west end development.
- The relevance of the west end in attracting new jobs, as highlighted in comment, is noted. This is a factor in favouring a continued concentration of development in this area.
- We not comment about the west end needing to be a larger area. Through the new plan development policy for the western side of the district is proposed to be more expansive.
- Infrastructure provision on the western side of the district is noted.
- It is noted that Exeter is a key factor that informs development growth and pressure on the western side of East Devon, though it is not considered (despite city constraints) that East Devon should

<ul style="list-style-type: none">• As it's proving difficult to attract jobs to the wider district, it makes sense to concentrate housing in the West End to minimise commuting.• The distribution of development will depend on the total number of homes to be delivered in East Devon – if less development is required then more than 75% should go to West End and less than 5% to villages; but if high amount of new housing then one or two new towns are likely to be needed.• The West End should include a wider area within which development should be focussed, where there is good strategic access.• A focus on development at the West End will direct development to a highly sustainable location with a significant level of employment opportunities, transport/public infrastructure and sustainable transport options, achieving carbon reduction.• Exeter is highly constrained both in terms of its administrative boundaries but also its physical context, which includes areas of high landscape value to the north and west of the city. Therefore, surrounding areas should contribute significantly towards meeting Exeter's development needs. <p>Less West End focussed comments advised</p> <ul style="list-style-type: none">• It is important to provide housing across the district to all towns and villages with facilities, to meet local needs, encourage people to work closer to their home, and encourage job creation – not just the West End.	<p>accommodate city needs (Exeter City council have not advised, in their opinion, of the need to do so).</p>
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- A less West End focussed approach would address the significant concerns in the Local Plan Inspector’s report (para 26, 27) regarding meeting housing need, particularly for affordable housing, in the rest of the district.
- Small scale development in villages and towns may help sustain local facilities and high streets.
- There are many villages with a primary school and village hall which should be supported with reasonable development.
- New housing in villages should accommodate growth to diversify supply, meet local needs and support rural facilities, consistent with NPPF paragraph 78.
- The Plan should look to strengthen the Towns and Villages rather than dumping houses to solve the Exeter housing needs.
- The distribution of housing on smaller sites across East Devon de-risks the delivery of focusing housing on fewer, larger sites in the West End that could prejudice the Council’s local Plan if they were to stall.
- The number of new homes being built on the edge of Exeter and at Cranbrook is having a huge toll on traffic, parking and infrastructure in and around Exeter.
- The West End should be protected from further development due to negative impacts on wildlife, so more development should go at the towns and villages elsewhere.
- Less West End focussed (option 3), as this has led to inflexibility and stalled housing delivery due to considerable infrastructure requirements, viability, market saturation, and SANGS issues. The West End dependency on Exeter will

In feedback on less favoured response for west end development:

- The local plan does, in recommendations, set out for development across the rest of the district, assessment work informs this, but also Government housing figures are high and as such this makes wider distribution almost inevitable.
- We would recognise the need for housing, especially affordable, across all of East Devon. Policies will seek to secure delivery.
- It is noted that housing growth can have some positive impacts on sustaining facilities, but more significant factors also apply.
- We have looked facilities, including schools and halls, to help establish appropriate locations for development.
- Whilst residents of Exeter might choose to move to the west end to live the housing provision, measured against Government targets is to meet an East Devon need.
- We recognised delivery concerns around a concentration of development on the western side of the district and as such see need for mechanism to be in place to ensure delivery comes forward. Though there are also a wide range of proposed allocations that do provide for development choice.
- We are promoting pro-active green policies that will secure environmental improvements alongside development.

become less important as people move away from towns and cities to being able to live and work in rural areas.

- Strongly support infilling at towns and larger villages, and building houses on the edge of East Devon’s villages where a significant amount of small-scale development can be accommodated without detriment to their character.

Feedback at issues and options consultation also included:

- The suggestion that additional employment development should be located close to Exeter, including a focus on the West End, did not elicit a preference from most respondents, although the slight majority of those that did express a view were not supportive. The feedback went on to advise of considerations to include: -
 - Interrelationship with the development within the city boundaries – competition for these jobs with Exeter residents
 - Skypark, science park and development at the growth point is slow – there is still capacity. Opportunity at Cranbrook to have small business clusters and develop land around Exeter airport.
 - Developers supporting continued west end focus /‘east of Exeter’, but to look to alternatives to that north of the A30, including along the A3052. Aspirations for Hill Barton and Greendale to grow countered by concerns that they

<p>are inappropriately large for the countryside location and are poorly controlled</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The East Devon AONB team support the concentration of development in the West End, outside the AONBs, but stress that consideration should be given to how visible new development might be when constructed in the views into and out of the AONB and to what extent it might impact on the setting and habitats of that part of the AONB. • Clarification is requested as to the relationship between the housing numbers for a new town and Cranbrook and how these might affect the prioritisation of housing sites identified around the towns and villages across the AONB to meet the required targets. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Landscape sensitivity assessment of all sites (including the new settlement) considers the impact upon AONBs, where relevant. • Housing numbers delivered at Cranbrook and the new town will contribute to meeting the district-wide housing requirements.
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No specific matters are noted. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No comments
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p>	

<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>See specific policies for commentary, noting that the plan retains a concentration on the western side of the district.</p>	

<p>Strategic Policy 8 – Development of a second new town east of Exeter</p>	
<p>Policy in the plan provides for development of a second new town east of Easter.</p>	
<p>Issues and options consultation</p>	
<p>See General Issues above.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation: General issues</p> <ul style="list-style-type: none"> • The Environment Agency note that the development of a second new town east of Exeter will result in a significant number of new homes in the Clyst catchment, where every waterbody is failing to meet good ecological status due to the high level of nutrients. The plan needs to demonstrate that further development will not lead to further deterioration and should seek improvements. • The Environment Agency state that the proposed new town will need to be the subject of a Strategic Flood Risk Assessment Level 2 to better understand the flood risks and how the new town could protect and enhance the floodplains. The provision of at least 254 hectares of land for green infrastructure is therefore welcomed subject to 	<p>It is noted that there were a very substantial number of comments raised in respect of the new community proposals. We do not attempt to address all of these in the observations below, rather we give some general and some more specific comments by way of feedback. There is considerable ongoing work (in late 2024 and this will continue in to 2025) in planning for the new community, this specifically includes Master Planning work. This ongoing work will be informed by comments received in draft plan</p> <p>By way of some succinct officer feedback:</p> <ul style="list-style-type: none"> • Evidence in the Water Cycle Study considers the impact upon water quality, which will inform the Local Plan. • A Strategic Flood Risk Assessment is underway and will inform the Local Plan, with further detail also being prepared on drainage issues.

the floodplain corridors being an intrinsic part of the green infrastructure and the inclusion of natural flood management, ecological enhancement and biodiversity net gains: they (the floodplains) should not be viewed as corridor to improve sustainable transport links.

- South West Water provide figures that suggest that the development mix would result in a requirement for 504 Megalitres of water a day by 2040 (based on current average consumption rates). This will have a significant impact on water resources and infrastructure so the policy should explicitly state the requirement for water use minimisation.
- Devon County Council (DCC) question if a new community is the best way forward given more working at home which reduces the need to travel, significant upfront costs, high trip rates until facilities are delivered – a better option is to expand existing towns.
- DCC support the early delivery of its town centre but question whether this is deliverable given delays to Cranbrook’s town centre.
- DCC state road improvements are mentioned but nothing about sustainable transport improvements which should be considered first and are more important.
- DCC are not clear how on infrastructure delivery and how large up-front infrastructure costs will be funded.
- DCC consider that 15 gypsy and traveller pitches up to 2040 is insufficient – 30 pitches across 2-3 sites would be more appropriate, and a further 30 pitches across 2-3 sites post-2040.

- Sites around existing settlements have been assessed, but there are not enough acceptable sites to meet the housing requirement.
- Infrastructure requirements and costs, including cross-boundary issues with Exeter City Council, will be considered in evidence and inform the Local Plan.
- A gypsy and traveller needs assessment will inform the appropriate level of pitches.
- Evidence on sustainable travel mitigation measures will inform the Local Plan.
- A SANGs requirements based on a minimum of 8ha per 1000 population has been incorporated within the land budget.
- Agricultural land quality is considered in the site assessment.
- Utilities evidence is considering electricity, gas and water supply in greater detail to inform the master planning of the new settlement.
- Traffic modelling is being carried out for the new settlement, which will inform the necessary mitigation measures to make the development acceptable – scenarios of 2,500 dwellings and 8,000 dwellings are being assessed.
- Education and healthcare provision will be provided in the new settlement to meet its needs.
- Lessons will be learned from experience at Cranbrook.
- Agree that it is confusing to use various terms of new community/town/settlement – new settlement is the preferred term.
- The issues in support and against each option have been considered in the Options Appraisal for a potential New Settlement, and further, more detailed evidence to inform the master planning of Option 1.

- DCC state the majority of employment provision will be of strategic scale which should be located close to existing main transport corridors. The volume of logistics and scale of buildings should have defined limits.
- DCC welcome the allocation of land for education infrastructure which should support primary, secondary, special and post-16 provision; likely to require most of the 23 ha identified.
- DCC note there are a number of watercourses mapped and unmapped which need to be considered to ensure a viable whole site drainage strategy.
- Disregards the changes to Government policy which mean housing numbers are no longer mandatory.
- Exeter City Council stress the importance, in respect of new town policy and implementation, of cross-boundary working to ensure consistence of approach around infrastructure planning to include transportation, education, health, community and utilities and habitat mitigation.
- Exeter City Council advise any new settlement needs will need to employ innovative forms of planning and delivery to achieve net zero. There are many challenges in delivering a new settlement fit for the future and we look forward to working in close partnership to try to address these challenges.
- Exeter City Council advise off-site transportation and infrastructure may be required within the city to help mitigate development impact. If this is the case, appropriate and proportionate developer contributions either through s106 or CIL will be required from

- The specific infrastructure concerns raised by Devon County Council are being addressed through collaborative ongoing work, specifically including through the master planning work.
- The intent is that the new community will include substantial employment opportunities and jobs.
- We do need to plan for a new town given that housing numbers are effectively mandatory and there are constraints on other site choices.
- The intent is to be innovative at the new town to secure net zero outcomes.
- Planning for adequate and appropriate transport is recognised as critical in the new town.
- Power line considerations will need to inform policy and master planning work.
- Management of open space and assets at the new town will need detailed consideration, though this to a large part will fall outside of local plan policy.⁷
- It is not seen that new town development will have an adverse impact on tourism, noting that the area it will be built in is not significant in terms of tourism attraction.
- East Devon District Council wish to be a core player in delivery of the new town and as such ensure services and facilities are forthcoming.
- It is not considered that development will increase houses prices, evidence indicates the contrary.
- Through site assessment work the emphasis has been placed on identifying key considerations. But there will always be a judgement call.

developments located in East Devon. Ongoing and comprehensive cross boundary infrastructure planning is essential to ensure that development impact is mitigated appropriately.

- Natural England advise the infrastructure provision for a second new town (point 6. Infrastructure) should specifically require the identification of Suitable Alternative Natural Greenspace (SANGs) based on a minimum of 8ha per 1000 population. All options drain via Grindle Brook to the River Clyst and then reaching the Exe Estuary posing a pathway for impacts on water quality. Measures to manage flood risk will be needed and SuDs should be required by policy. Options for allocations should avoid loss of “best and most versatile agricultural land” as advised in the NPPF paragraph 174. Higher quality land is present in all options. Your evidence base should include all available soil data to appraise options for a new settlement.
- Devon Wildlife Trust welcome the commitment to deliver a minimum of 254 hectares of land for green infrastructure. However, a greater level of detail is required within this policy to ensure that high quality nature-rich infrastructure is delivered. In representation they set out more detail on provision they would wish to see.
- National Grid state that Options 2 and 3 are traversed by NGED’s Exeter Main 132kV line, a strategically important electricity supply line within East Devon. Any proposals to divert or underground this line would be highly challenging and disruptive to supply and NGED would object to development proposals which are reliant upon such works.

- Final settlement size will require further consideration.
- Highway capacity issues and such matters as park and ride provision will need some attention.
- Impacts on existing residents will need to be considered through master planning work.
- Traffic modelling work is ongoing – as is the need to look at public transport, walking and cycling importance.
- Noted that the sites options are not next to railway lines.
- A full range of facilities would be sought in association with development. This will be especially important in respect to GP provision.
- It is recognised that some local communities are opposed to the development. There is however a need to balance competing and often conflicting demands in local plan making and on balance the development is seen as appropriate.
- Pollution matters will be considered through ongoing advancement of proposals.
- Development is not seen as contrary to the success of the Enterprise Zone.
- It is not seen in principle that development would impact on the airport, though noted further discussion is relevant.
- We need landowners to identify land in order to establish that it is available for development.
- Potential for adverse impacts, and their avoidance, will form a key part of master planning work.
- Capacity issue and housing delivery rates are been looked at in detail. But the onus is on positive new levels of house building.

NGED's preference is for the overhead line to remain in situ and any proposals for a new settlement to be designed around them. Early consideration of the overhead lines in the masterplanning process can enable the lines to be sensitively and efficiently designed into the development.

- Sidmouth Arboretum -
 - Section 4 on the town centre would be strengthened if there was a specific mention of the beneficial effect of and a numerical target for canopy cover. If the target canopy cover was included, then some pre-emptive planting could begin as soon as the layout of the town centre was known.
 - Section 6 on infrastructure mentions 254Ha of land for Green Infrastructure (GI) and this appears to be only the metaphorical greenness.
- Cranbrook Town Council agrees with the need to deliver a substantial percentage of housing through a new settlement, but believes that the plan does not address the strategic infrastructure needs that will be required to underpin this. They also believe that the plan does not learn from the lessons of the development of Cranbrook, particularly in terms of the management of public amenities. For example, one of the very big errors in Cranbrook was attempting to manage public amenities through an estate rent charge and management company. This approach was grossly expensive to residents and provided a very poor service to the community.
- Query the need for a second new town (especially in the absence of the latest Census and lack of long term data re working from home patterns) and the impact this will have

on Cranbrook. For example incremental expansion of existing settlements, have been properly considered and whether proposals for the new town are premature

- Concerned at the negative impact further development will have on the perception of East Devon from a tourism and quality of life perspective
- Clyst Honiton Parish Council supports the principle of a new town in their area, but believes that the provision of 2,500 homes within the proposed plan period is optimistic. They believe that planners should get ahead of the curve and not let developers determine what is provided when. Create a sustainable and thriving new community.
- New build housing pushes existing house prices up making homes unaffordable.
- Oppose all three options – this option was missing from the consultation.
- Not enough emphasis is being placed on brownfield sites.
- Site assessment is based on eleven categories that are so broad in their definition that any scoring can only be on a subjective basis, which is not a sound basis for judging the preference of one site over another.
- Points raised in mitigation are very subjective and can well be argued either way, the Council has made its decision on preference and simply seeks to justify it.
- Make the new settlement bigger.
- Focussing development close to Exeter is sensible to avoid swamping existing settlements or developing in AONB.

- The A3052 and M5 Junctions 29 and 30 are often at capacity already, without adding 8,000 new homes, particularly when existing park and ride facilities are all on the Exeter side.
- Traffic would be so bad that it would be impossible to use Westpoint as a showground if one of these options was developed.
- No mention of Service Road which will impact on existing residences, traffic planning, emergency services.
- WSPs traffic modelling report is totally inaccurate – plans for 2030 not 2040, does not consider construction traffic, mitigation measures have not been subject to detailed modelling.
- Active travel links to Exeter and train stations will be easier for large scale development in this area.
- Cycle routes into Exeter are inadequate, there is no detail on how this will be overcome.
- Cumulative transport impacts need to be recognised from the start and ensure delivery of a proper strategic transport plan.
- None of the options have a railway line meaning other forms of transport will be used.
- Have not taken the impact of construction traffic into account.
- The areas are prone to flooding.
- Biodiversity and habitats that form part of a wider ecological network will be adversely affected.
- Existing country lanes in the area will become rat runs.

- A new settlement will ruin the rural city character of Exeter.
- Will be a dormitory town serving Exeter, having to wait many years for facilities.
- Current healthcare facilities including GPs, dentists, ambulances, and hospital services are struggling, so a new town would add too much strain.
- Pinhoe and Broadclyst medical practice comment that health provision at Cranbrook has been inadequate and need to learn from these mistakes – primary care services need funding for greater capacity before further housebuilding in the West End of East Devon.
- Need to learn lessons from Cranbrook such as need for clear masterplan, high quality design, and prioritising infrastructure and facilities over housing.
- Would rather see organic growth of existing settlements than new towns to better retain the character of the area.
- No reference is made to dealing with wastewater, South West Water already pumps sewage into the sea.
- Increase the number of homes at the new settlement within the plan period to 5,000 to remove the need for second choice sites and several preferred sites in unsuitable locations.
- There is no justification for the new gypsy and traveller pitches as lack of evidence on need.
- Focus on delivering green infrastructure to connect green areas throughout the site.

- Much better to have a carefully planned new town rather than continually expanding existing settlements which already have overstretched infrastructure.
- Infrastructure is likely to come far behind housing, based on recent experience at Tithebarn, Cranbrook and Pinhoe – need facilities early on to establish patterns of behaviour.
- Location next to major roads will not help reduce car usage.
- Need to provide religious opportunities.
- Provide jobs near to where people live to minimise the number of cars on the road.
- Why are all three options located so closely to each other, there must be other options in East Devon.
- The recently adopted Farringdon Neighbourhood Plan voted for by 88% of residents is being completely disregarded, which is undemocratic.
- Farringdon should not be obliterated by a new town.
- New town will cause light pollution in a rural area with dark skies.
- The destruction of agricultural land will threaten food security.
- The reduction in working age population in more than half of wards in East Devon mean that development does not need to be located close to jobs in Exeter.
- The Enterprise Zone can be supported by future planned development at Cranbrook rather than needing a new town.

- Need a stronger commitment to joint working with Exeter given that residents will use facilities in Exeter.
- Exeter and Devon Airport Ltd consider that the impact of proposed development upon Exeter Airport has not been properly assessed, which is a significant future risk of conflict.
- Include eco-tourist facilities with holiday rentals to encourage tourism.
- The options have been developed based on land made available by landowners, and is a policy led by landowners and developers.
- Policy content on energy efficiency, design quality and access to facilities is vague.
- Need lots of investment in public transport otherwise there will be far more cars on the road.
- There should be a focus on high quality homes that are built to last.
- There is potential for a small new village based around the Greendale facility, provided a new roundabout is built on the A3052.
- Use mass timber construction to reduce use of concrete/steel to reduce carbon footprint.
- New town options being discussed at same time of Farringdon Neighbourhood Plan so developers interests preferred and very close to Cranbrook.
- There was some support for a new town to avoid additional crowded housing estates in existing settlements.

- Traffic problems along A3052, A376 and M5 with no good bus or train links.
- Will harm distinctive landscape.
- Historic England note that all 3 options would have an effect on the significance of certain designated heritage assets, and the envisaged level of change will no doubt considerably alter their wider setting and one's experience of the rural landscape. They recognise the Council's view that with further assessment and master planning, there is scope to minimise that impact, and to take the opportunity where appropriate to improve matters.
- Historic England also anticipate that the Plan will include, within the policy, key design principles to ensure development positively responds to historic landscape character, heritage assets and their settings.
- National Highways state that all new town options are likely to be heavily reliant on the A30 and A3052, and therefore could result in an impact on the operation of M5 Junctions 29 and 30 – need evidence to demonstrate how the new town can be delivered up to the year 2040 and beyond to its full extent.
- National Highways state there are limitations in the new settlement Highways Impact Modelling Report, namely it only considers 2,500 dwellings not the full 8,000; no additional local plan or background beyond existing local plans was included; need to update DCC Greater Exeter Model; modelling uses a forecast year of 2030, rather than 2040.

- Support principle of new town close to Exeter because infrastructure is in place and could provide affordable housing not possible by adding small sites to villages.
- Confusing that the terms new community/town/settlement are used interchangeably throughout the plan – prefer the term new community.
- New community should advocate high quality design based on Garden Design principles from the outset.
- Direct development to Cranbrook as already has infrastructure, direct road and rail links, utilities.
- Insufficient land has been made available for SANGS and BNG.
- Object as lack of transparency an intended new road was not shown on plans.
- 140 comments were received by the Council through a third party website: [Greenhayes Garden Village](#). People were invited to indicate why they supported the proposal in a few words, although some did not support and other comments highlighted a need for affordable housing, praised the sustainability potential of a new settlement and felt that it would take the pressure off existing towns and villages.
- Site promoter considers that the number of dwellings that can be delivered in the New Town in the plan period could be higher than 2500.
- Housing industry organisation encourages EDDC to engage with the industry to ensure that the concepts proposed are realistic, achievable and viable.

<ul style="list-style-type: none"> • A developer has significant concerns as to whether the new town can deliver 2,500 homes by 2040, so reduce this figure and allow additional sites – specifically, Land at Addlepool Farm for 700 dwellings and other facilities. • A site promoter suggests that long lead times, particularly considering more restricted access to Government funding than for Cranbrook, mean that those parts of the site that can be released early (Cat Copse 15/1833/MOUT is specified) should be developed. • A site promoter supports the inclusion of land south of the A30 close to the airport for strategic residential development (as part of Denbow) and ‘softer’ related uses (such as BNG and SANGS). • Prepare a specific plan for the new settlement, like has happened at Cranbrook. • It is premature to plan for post 2040 as other more sustainable locations could become available after then within the Exeter sub-region. 	
<p>Option 1 – Support</p> <ul style="list-style-type: none"> • Devon County Council favour option 1 albeit they note that waste and minerals operations at Hill Barton Business Park would impact on part of the site. They note that it would be the least worst option from a transport perspective but still raise concerns about impacts on the road network. • National Grid also favour option 1 highlighting issues associated with the Exeter Main 132kV electricity line that runs through options 2 and 3 and stating that proposals to divert or underground the line would be highly disruptive 	<p>As with general feedback we have kept feedback on Option 1 succinct, noting ongoing work elsewhere on planning for the new development.</p> <ul style="list-style-type: none"> • Option 1 is the chosen site for the development and support is noted. • The transport benefits of the site are noted. • The National Grid comments are welcomed and noted. • It is noted that land owners report of land availability. • The comparatively limited adverse landscape impacts of this option are noted. • Potential for an A3052/A30 link road is noted.

and challenging. They say that any proposals that rely on these would raise an objection from them.

- The Otter Valley Association also favoured this option due to its access to the strategic road network.
- Support Option 1 given its transport connections, access to jobs at the Science Park, Airport, Crealy and Exeter.
Support Option 1 as it has best access to major roads.
- Landowner of Waldrons Farm (Farr_02) support Option 1 and state their land (also in Option 2) is available to contribute to a new community – this site can be in the first phase as it fronts directly on to the A3052.
- Support Option 1 as it is gently undulating, and no areas that have serious flood risk
- Link road between the A30 and A3052 will improve the local road network.
- Support Option 1 as lots of buses already operate in the area.
- Church Commissioners England support Option 1 as good access via the A30, proximity to commercial uses, complement the CVRP, and landscape, heritage, and ecology impacts can be made acceptable.
- Well sited as potential to extend the district heating network from Hill Barton to Cranbrook.
- Essential infrastructure, such as the spine road, should be delivered early to improve housing delivery rates.
- Policy should facilitate an effective consortium approach to ensure all parties have an equal voice.

- District heating network extension potential is noted.

<ul style="list-style-type: none"> Do not support a new town, but Option 1 is best as will have less impact on existing communities. 	
<p>Option 1 – Against</p> <ul style="list-style-type: none"> No train station within walking distance (unlike Cranbrook) and will add extra load on services such as transport, hospitals, and emergency services. This option would destroy Farringdon which is a peaceful village set in glorious ancient countryside – the Fiona Fyfe landscape sensitivity assessment refers to its “distinct sense of timelessness” and states high landscape sensitivity. Object to extending the new settlement east of Farringdon Cross, as it will envelop the existing community. Several Grade II listed buildings will be destroyed by this development. Options 1 and 2 have a higher visual impact than Option 3. Options 1 and 2 have less infrastructure than Option 3. Object to Option 1 as it has very little public transport. Parish will be split in two by new road from A30 to A3052 which will become a rat run. Farringdon Residents Association, amongst others, object as contrary to the made Farringdon Neighbourhood Plan which allows for 12 extra dwellings. Object as roads are already too busy, particularly A3052, at Clyst St Mary and M5 J29 and J30. Concerned about increase in flooding from surface water run-off in surrounding areas due to new development. 	<p>By way of succinct feedback:</p> <ul style="list-style-type: none"> It is noted that this option does not have a train station, but that applies to all of the options. Policy refinement and master plan work will look at the sensitivity of the setting of Farringdon. Sensitivity of heritage assets will be taken into account in master planning work. Public transport provision will feature significantly in development of proposals. Care will be needed in respect of adverse impacts or operations of any new roads, including in respect of potential for them to become ‘rat-runs’. Neighbourhood plan concerns are noted, though they are subservient to strategic policies in the local plan and there is the need to accommodate development. Highway capacity issues are forming part of current assessment work. There is detailed transport modelling including in respect of seeking modal shift away from cars. Flooding concerns will need to be addressed, but these are most relevant top master planning work. Land needs for SANGs will be rigorously established.

<ul style="list-style-type: none"> • Insufficient land has been made available for SANGS and biodiversity net gain. • Object to development east of Farringdon Cross as this will destroy rural setting. • Concerned that already overstretched GP and hospital services will not be able to cover this area as well. • South West Water are already discharging raw sewage, this will just make it worse. • Option 1 will adversely affect the historic environment in the area, including 13 listed buildings in Farringdon. 	
<p>Option 2 – Support</p> <ul style="list-style-type: none"> • Option 2 is a good location as it already has jobs, retail and public transport. • Support as provides housing near infrastructure and employment without merging existing villages. <p>Option 2 – Against</p> <ul style="list-style-type: none"> • Object to Option 2 due to landscape impact, particularly on AONB and to north of Woodbury Salterton. • It will destroy our rural countryside. • Options 1 and 2 have a higher visual impact than Option 3. • Options 1 and 2 have less infrastructure than Option 3. • Otter Valley Association object to option 2 as it would increase traffic through Newton Poppleford and increase congestion on the A3052. • Inadequate road capacity, particularly on the A3052 but also the A376, B3179 and M5 junctions. 	<p>As with general feedback we have kept feedback on Option 2 succinct, noting ongoing work elsewhere on planning for the new development. It is relevant to note that to some degree concerns raised around this option are to some degree a general concern that could apply to all options.</p> <ul style="list-style-type: none"> • Positive comment in favour of this option is noted. • Landscape concerns with expectations of higher impacts with this option are noted. • Existing infrastructure limitations are noted though to some degree this applies to all options and for any site/scheme significant new provision would be needed. • Concerns on highway impacts are noted as are capacity constraints. • Potential for impacts on existing villages and the countryside are recognised. • Comments in respect of water quality related concerns are noted. •

<ul style="list-style-type: none"> • Will have a negative impact on the way of life in surrounding villages. • Object as biodiversity in the area needs to be protected, including County Wildlife Sites. • Contrary to Farringdon Neighbourhood Plan. • Development will increase flooding in the area. • Option 2 is located over a water supply/bore hole where most of Farringdon receives it water. • There is inadequate infrastructure in the area, for example schools, hospitals. • This will lead to light pollution in Farringdon which currently has no streetlights. • The western and southern areas are reasonable infill, but the north eastern area encroaches into genuine green space. 	
<p>Option 3 – Support</p> <ul style="list-style-type: none"> • •A landowner supports Option 3 as the best option – it offers good road infrastructure; public transport opportunities including close to rail links; proximity to Exeter city centre; proximity to a range of employment sites, retail and leisure facilities; access to open space. • Landowner states Option 3 can accommodate a range of mixed uses (housing, employment, open space, leisure healthcare, infrastructure, Clyst Valley Trail) in a phased manner, with cooperating landowners. • Landowner states that Option 3 can deliver earlier due to presence of rail links, road access and existing infrastructure, unlike the other two options where more 	<p>By way of succinct comment on support for option 3:</p> <ul style="list-style-type: none"> • Support for the option is noted. • Co-operating landowner comments are noted. • It is recognised that there is some existing infrastructure at Option 3, though there is also at other options. Of more significance is that all options will require substantive new provision. • A separate assessment of Addlepool potential is being undertake. • Potential for development at villages that relates to employment availability is best address through village planning related work, elsewhere in the plan. • Comments on this option being the least rural are noted. But these need to be seen in the context of wider landscape/environmental considerations.

<p>substantial up-front infrastructure investment is required to deliver sustainable development.</p> <ul style="list-style-type: none"> • A developer (Vistry) support inclusion of Land at Addlepool Farm as forming part of a second option for a new town but consider this site can come forward on its own to accommodate a self-sufficient, sustainable, new village of 700 dwellings and facilities – Vistry submit a Vision Document for this land. • A landowner (Mr and Mrs Murray) support Option 3 subject to the inclusion of their land of 2.1 acres/22 dwellings at Shephards Farm (map attached to Commonplace response). • Ebford/Clyst St George has been identified as sustainable by three Appeal Inspectors and EDDC Planning Committee as it has numerous facilities, sustainable travel links, over 500 jobs but no housing to serve them – therefore support Option 3 with a connection north to Option 1 for the future. • Option 3 is the best option as it the least rural and limits the impact on the surrounding area, with better roads and amenities. • This option has excellent transport links, easy to access popular locations like Exeter and Exmouth. • Option 3 will benefit local shops in Woodbury. 	
<p>Option 3 – Against</p> <ul style="list-style-type: none"> • Clyst St George Parish Council (PC) object to Option 3 due to the impact on character and setting of the historic medieval village. 	<p>By way of succinct comment on support for option 3:</p> <ul style="list-style-type: none"> • Opposition to this option is noted. • Concerns around impacts on village and infrastructure capacity are noted.

- Clyst St George PC object due to impact on existing residents.
- Clyst St George PC object as will exacerbate of existing highway and infrastructure problems.
- Clyst St George PC state the boundaries have been drawn without regard for topography or landscape importance. In the detailed response other issues raised include pre existing traffic issues, significant existing road flooding and risk to flood defences and existing properties, proximity to AONB and impact on approach to the village (especially from historic Woodbury Castle), lack of local employment increase in commuting, increase in congestion, lack of school places and other services such as shops.
- Clyst St George has poor public transport with no bus service, there are no safe pedestrian crossings to reach bus number 57.
- Topsham train station is 1.75 miles away has no car parking and too far to walk with no crossing points on route.
- A substantial area sloping north from Clyst St George is affected by flooding, with the ford regularly impassable – development in this area will adversely affect the 15 dwellings at Pytte near the ford.
- The majority of Option 3 is clay soil, surface water run-off is already a problem, including along the B3179, A376, Topsham Road and other local roads around Clyst St George.

- Wider environmental impact concerns are noted.
- Limitations on existing public transport are noted, however, any new development would need to come with new provision.
- Flooding considerations are noted, though as with other considerations they would need attention and resolution if the option were progressed.
- Proximity of this option to the AONB is noted.
- Particularly site landscape sensitivities towards Ebford are noted.
- Concerns around infrastructure capacity are noted.
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- Clyst Valley frequently floods, which is getting worse with climate change – the proposed new settlement will exacerbate this.
- Object as it would ruin the historic medieval village of Clyst St George.
- Roads are already congested at peak times, particularly around Clyst St Mary, the A3052, the A376, B3179 and M5 where there are lengthy traffic queues.
- Absence of pedestrian crossings, combined with current traffic levels, makes it dangerous for pedestrians.
- Building on Option 3 will be detrimental to the western edge of the East Devon AONB, ruining beautiful views to and from Woodbury Castle, and destroying the stunning landscape between Clyst St George and Woodbury.
- South western section of Option 3 will have an adverse impact where it spills over the ridge to Ebford.
- Object as there are limited employment opportunities, residents will need to commute elsewhere e.g. to Exeter, Exmouth, Science Park.
- The primary school in Clyst St George is too small to cope with a new settlement.
- There are no shops in Clyst St George, requiring new residents of Option 3 to travel elsewhere.
- Option 3 is contrary to the Clyst St George Neighbourhood Plan.
- Object as not on the railway line, so will lead to more traffic congestion.

<ul style="list-style-type: none"> • Will destroy the rural community and just become a suburb of Exeter – small villages of Woodbury, Woodbury Salterton, Clyst St George, Ebford will be dominated. • SA Report states the reasons for rejecting Option 3, which should be adhered to. • The gas and electricity network will not be able to cope with this development – Clyst St George is off-grid for gas. • Object due to increase in noise in the local area. • Object due to impact upon the numerous listed buildings in the area. • Local GP surgeries cannot cope with existing numbers of patients. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No specific concerns are highlighted. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No comments
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • It is recognised that the scale and location of the new town will raise significant matters that are of HRA relevance. The HRA work advises – in respect of potential risks to the sites of: Recreation effects alone (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar); Hydrological effects 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • There is ongoing work and will need to be more in respect of HRA considerations and relevant mitigation.

<p>alone (Exe Estuary SPA/Ramsar); Air Quality alone (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar, Sidmouth to West Bay SAC). And comments - Allocation for new town, and while location and specific details uncertain, broad location means clear risk for East Devon Heaths and the Exe Estuary in particular.</p>	
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<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title:</p>	
<p>Strategic Policy WS 01 – Development of a second new town east of Exeter</p>	
<p>The Local Plan has been redrafted to reflect the latest evidence that was prepared to inform the new community. Policy wording has nit, to date, changed significantly, but will be subject to further review.</p>	
<p>Use a single term when referencing the second new town – “new settlement” is the preferred term.</p>	
<p>Option 1 is chosen as the allocation for the new community and the intent is this will be shown on the Policies Map (though with potential boundary refinements).</p>	

<p>Strategic Policy 9 – Development within the Enterprise Zone</p>	
<p>This policy supports inward investment and development for business and allied uses on 4 sites which together make up the Enterprise Zone. Within Policy there is a clear focus on clean growth and innovation.</p>	
<p>Issues and options consultation</p>	
<p>See General Issues above.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p>	<p>Officer commentary in response:</p>

- Most respondents supported the principle of the enterprise zone, however there were some concerns about concentrating development away from existing settlements so that workers would have to travel by private vehicles, increased traffic and requiring developers to meet high standards.
- National Highways state the Local Plan will need to be underpinned by robust transport evidence to demonstrate it is deliverable, enables any necessary mitigation, and to understand access proposals, including the collection of sites in policies 9-15 which face the A30 and M5 Junction 29.
- Devon County Council recommend adding reference to 'A Clean Growth Vision for Development in the West End of East Devon' to all employment policies in chapter 4.
- More specific points included:
- Devon County Council (DCC) feel that no reference should be made to District Heating connections specifically, rather a more flexible policy that considers all potential forms of clean energy and highlights economic opportunities from the move towards Net Zero.
- DCC state that BREEAM requirements should match other employment allocations.
- Devon Wildlife Trust would welcome the inclusion of reference to the requirement for protection and enhancement of our natural environment in policy.
- Clyst Honiton Parish Council recommends that new housing developments should include better cycling and

- Support for the Enterprise Zone is welcomed.
- DCC's comment re not requiring connections to District Heating is noted, however connection to the District Heating Network is supported by this Council, as demonstrated by the LDO.
- The requirement to comply with/achieve BREEAM standards has been deleted along with other matters that will be addressed through other policies in the plan.
- Concern regarding accessibility and the location of the Enterprise Zone away from housing is noted, however this varies between the sites within it eg Cranbrook Town Centre is surrounded by housing. The West End is very well served by public transport and non motorised user provision in this area will increase significantly during the life of the plan.

walking routes. This has not always been done in the past, and land ownership can be a challenge to overcome.

- It concentrates activity and jobs unevenly.
- Difficult for young people from the rest of the District to access jobs in the West End using public transport.
- Concentrating development in the Enterprise Zone means that residents will need to drive a considerable distance to work. This conflicts with the aim of providing jobs close to home.
- Joined up public transport is essential
- Will increase HGV's and congestion. Existing employment eg Amazon and Lidl traffic was supposed to utilise rail freight
- "Will need" needs to be clarified and strengthened. Delivery model prioritises developers objectives/developers essentially pick and choose what they want to build/employment will be lost to housing as it makes more profit for developers
- There must be sufficient resource in the relevant council department to ensure that high quality development is delivered and developers don't dilute provision.
- Support high energy efficiency in new buildings. By requiring BREEAM rather than Passivhaus (or similar) standards you are enabling developers to get away with lower performing buildings and thus "greenwashing" their and EDDC's eco pronouncements.
- Businesses will move away once grant funding dries up or greater incentives eg tax free zones, are offered elsewhere

- Long term these employment premises might only be for storage with few employees, the most important aspect of this scheme is the Exeter Logistics Park.
- Emerging investment and economic development is supported. However, the BREEAM Excellent or equivalent standards is an excessive constraint to development if it is considered a prerequisite of approval.
- Link with Exeter Uni, Met Office SWW etc
- A cost benefit and risk assessment is needed to ensure that the Enterprise Zone does not pull skilled people way from other nearby smaller local hubs and SMEs
- What about north Axminster and expansion of Greendale? Let's keep an open mind about post 2040 enterprise zones.
- Zero emission shared mobility, such as ebikes and e car clubs, is aligned with Enterprise and Innovative ethos, yet not mentioned. Suggest these are included and promoted
- I am in favour of developments for enterprise and research, constructed on brownfield sites.
- Some good parts - digital infrastructure and district heating. I feel this should be considered in the context of Cranbrook ad they should complement each other.
- These sites are well chosen and meet all our present needs in terms of required capacity over the Plan period.
- This development is not needed to serve the needs of local people.
- The impact of Exeter's policy to redevelopment existing employment sites and EDDC's policy to further limit the

<p>location of B2/B8 uses needs to be assessed in terms of its cumulative impact on employment land supply specifically for industrial uses which are most affected by these policies.</p>	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation: N/A</p>	<p>Officer commentary in response: N/A</p>
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No specific concerns highlighted. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No comments
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title: Strategic Policy WS 02 – Development within the Enterprise Zone</p>	
<p>Policy has been amended to remove those matters that are covered by other policies in the plan, simplifying and clarifying it. It also corrects the locations of the heat networks.</p>	

<p>Strategic Policy 10 – Exeter Science Park</p>	
<p>This Policy establishes the approach to future growth that will apply to the Science Park</p>	

Issues and options consultation	
See General Issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • A number of respondents expressed support for the Science Park and what it is doing. • Devon County Council recommend highlighting the economic opportunities from the move towards Net Zero, including adding a reference to ‘A Clean Growth Vision for Development in the West End of East Devon’. • The text stating it may take up to five years for passenger numbers to return to their 2019 levels should be sourced, otherwise it sounds spurious and hopeful. • Concern that benefits of new jobs are not being seen. • Concern that business attracted to a Science Park are transient, might move away, and jobs are not guaranteed as permanent. • Policy should also support creative industries to. • Concern that Exeter Science Park leads were not consulted on the proposals. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Support for the Science Park policy is welcomed. • Policy doesn’t refer to it taking up to 5 years for passenger numbers to return to their 2019 levels. • Consultation was widely publicised, available online and at in person events and open to any interested parties. • There is clear economic evidence that jobs on the Science Park are not transient and pay is typically higher than in other sectors in the District. • Creative industries are not specifically supported on this site as occupiers must comply with the original legal agreement setting out the range of activities which are acceptable in order to deliver the science park objectives • The Clean Growth Vision is referenced in the reasoned justification which applies to the economic policies within the West End
Supplementary Regulation 18 consultation Spring 2024	
<p>Key issues raised in consultation: N/A</p>	<p>Officer commentary in response: N/A</p>
Sustainability Appraisal	

See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The HRA work advised: Policy is site specific but strategic in that • it does not set any particular levels of development and simply information on which uses are acceptable. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • It is not seen that specific concerns to address have been raised.
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: Strategic Policy WS 03 – Exeter Science Park	
Policy has not been amended as no substantive points have been made which warrant it	

Strategic Policy 11 – Land north of the Science Park	
This Policy seeks to allocate land for housing and employment development	
Issues and options consultation	
See General Issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Most respondents supported the principle of the enterprise zone, however there were some concerns about concentrating development away from existing settlements 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Support is noted. • It is agreed that a mixed use scheme would create a better balance of development and self-containment, reducing the need to travel.

so that workers would have to travel by private vehicles, increased traffic and requiring developers to meet high standards.

- **More specific points included:**
- Repetitious - Policies 10 and 11 overlap/are the same
- Development is not required/no need for additional jobs.
- More loss of greenfield space/more greenspace is needed.
- Support policy/seems sensible/area already developed so support proposals.
- Housing development should be considered amongst the science park and indeed could take a new town.
- This area will require workers to travel (by private vehicles) and there is no permanent commitment to public transport
- Will deter start-ups and could lead to research and technology businesses being asked to leave if they are not successful?
- Cumulative development across the GESP area will be detrimental to East Devon
- The businesses there must fully integrate not only creative components but also be fully engaged in delivery of high quality technical apprenticeships.
- Businesses could offer limited Greg Wallace type 'Inside the factory/business' tourism experiences
- There are already empty units at Sowton Ind Est
- How will "New business developments will need to be of the highest quality and should reflect forms of development in the surrounding area" be tested and enforced.

- The Science Park has considerable spare capacity and has not indicated a desire to expand northwards in the Plan period
- Smaller scale business units are now proposed to encourage start-ups and offer an alternative to the Science Park employment offer
- Large scale logistics would not be facilitated on the site (not least as the scale would not accommodate it).
- Infrastructure requirements are covered by other policies in the plan.
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- This is site Brcl_23 in the consultation documents.

<ul style="list-style-type: none"> • Devon County Council state large scale logistics and industrial uses should be considered incompatible with Sowton Village and the Science Park due to close proximity of housing and the high-quality Science Park environment. • The sewage system in this area needs to be improved before any further development can take place in the area. 	
Supplementary Regulation 18 consultation Spring 2024	
Key issues raised in consultation: N/A	Officer commentary in response: N/A
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> • Comment raised stated: Potential risks - Hydrological effects in-combination (Exe Estuary SPA/Ramsar); Air Quality effects in combination (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar). 	Officer commentary in response: <ul style="list-style-type: none"> • Work will need to be undertaken in respect of these considerations.
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: Strategic Policy WS 04 – Land north of the Science Park	
In light of representations Policy has been amended so that the whole site will no longer be allocated for employment of a similar type/to facilitate expansion of the Science Park. Instead, 2ha closest to the motorway will be allocated for small business units and the remaining 2.3ha will accommodate 90 houses. There is still a requirement for development to be of the highest quality with a requirement for a comprehensive	

scheme with particular emphasis on provision of high environmental quality and standards to ensure that it complements the character of the Science Park.

Strategic Policy 12 – High quality employment north of Sowton village - Now Deleted

This Policy allocated land for employment purposes

Issues and options consultation

See General Issues above

Draft Plan consultation

Key issues raised in consultation:

- This policy received some support although particular concern about the amenity impact on Sowton village, traffic impact and lack of public transport and level of need for the development was raised.
- Historic England note that the Sustainability Appraisal indicates that a proposed allocation would have an impact on the adjacent heritage assets including the Sowton Conservation Area. It would be helpful to appreciate whether a Heritage Impact Assessment has been undertaken to inform the principle, location and form of development.
- More specific points included:
- Repeats other employment policies
- Cycle access by Sowton Lodge and J29 should be improved

Officer commentary in response:

- The site assessment concluded that there would be significant harm to heritage assets. This would reduce if the northwestern section of the site only was allocated, however a new access would still need to be provided and details of this are unclear.
- On balance it was decided to delete the policy and not allocated the site for development.
- This is site GH/ED/66 in the consultation documents.

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| <ul style="list-style-type: none">• Object to further development• Concentrates too much traffic at an already overwhelmed pinchpoint of the road network.• High quality development should be the norm, not the exception.• Unacceptable impact on Sowton village• B class development is not the best type of employment• This is a reasonable place for B uses.• Businesses using HGVs and large polluting diesel motors could be located close to the main arteries, rather than impacting on the countryside and narrow, rural lanes.• This will meet Exeter's employment need, it is excessive for locally generated need• Where will Sui Generis commercial uses be located?• Housing and employment should be co-located to reduce travel• Sowton neighbourhood plan should be taken into account• This will add to the sustainability of the city and create significant investment and job creation for the East Devon District.• The scale of the allocation means a diverse range of businesses can be accommodated, strengthening the economy and allowing for the creation of new business relationships and synergies. These connections are also likely to be made with the many existing businesses on the Science Park close by. | |
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- The site's proximity to the A30, immediately to the north, the M5 to the west and Exeter airport to the north-east is a significant benefit.
- The site promoter points out that policy states that the site measures around 17 hectares but it in fact measures approximately 19.3 hectares.
- The policy only allows use classes B2, B8, E(g) and a limited element of ancillary uses such as indoor sports, recreational, crèche or cafe. The policy should be interpreted to permit sui generis uses that may also be in the spirit of the B and E(g) uses listed above.
- To support the LP ambitions to deliver net zero developments and to combat climate change, the allocation should include provision for battery storage infrastructure. This will provide for on-site needs, support the resilience of the grid and support renewable energy, and enable surplus energy to be utilised efficiently.
- Visually attractive development is essential. Ensure that future development creep is avoided/managed and that a strong visual gateway to the south west is maintained and enhanced
- Need to explain how this connects into existing sustainable transport networks, noting that an extra 300 space car park was built at the first Science Park.
- This is a more sensitive site than other proposed employment sites in the West End.
- Community benefits for Sowton village should be a requirement.

- The low-traffic Sowton Lane to Taylor's Break should be enhanced and linked to this development, and also suitable cycling/walking route across to the Blackhorse pub and Blackhorse Lane
- Need to retain this greenspace for leisure activities.
- Developer (Waddeton Park) states this land has been subject to feasibility work and discussions with Exeter Airport which show that development can proceed without adverse impacts on the Airport.
- National Highways query this allocation as it appears to have limited local highway access and is adjacent to the strategic road network (the A30).
- Devon County Council state large scale logistics and industrial uses should be considered incompatible with Sowton Village and the Science Park due to close proximity of housing and the high-quality Science Park environment.
- DCC are not clear how this site will be accessed, whether from the A30 or M5 and a large new junction may be required at significant cost.
- Sidmouth Arboretum - The policy would be strengthened if there was a specific mention of the use of trees around the site perimeter to act as a screen. As with the new town centre, pre-emptive planting of trees on the boundary of the proposed site would mean the tree screen could grow sufficiently to act as a screen even as the building work was going on.

Key issues raised in consultation: N/A	Officer commentary in response: N/A
Sustainability Appraisal	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Historic England note that the Sustainability Appraisal indicates that a proposed allocation would have an impact on the adjacent heritage assets including the Sowton Conservation Area. It would be helpful to appreciate whether a Heritage Impact Assessment has been undertaken to inform the principle, location, and form of development. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • A HIA was undertaken as part of the site assessment and its findings have informed the decision to delete the policy.
Habitat Regulations Assessment	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Comment raised stated: Potential risks - Hydrological effects in-combination (Exe Estuary SPA/Ramsar); Air Quality effects in combination (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar). 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Policy is proposed for deletion.
Commentary on policy redrafting for the Publication Plan	
<p>Redrafted policy title: Strategic Policy Deleted</p>	
<p>Informed by the responses to the consultation and the site assessment findings the Policy and allocation have been deleted due to the potential for significant harm to be caused to heritage assets.</p>	

Strategic Policy 13 – Exeter Airport and its future operation and development	
This policy has the primary function of providing for appropriate growth and development at and of the airport, within operational boundaries and also resisting inappropriate development within the 57 decibel contour around the airport.	
Issues and options consultation	
See General Issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Some concern was expressed around the suitability and appropriateness of supporting airport operation/existence, adverse environmental impacts highlighted. Though in contrast there was also support for the airport with a call for more flights to more destinations. • Policy should resist loss of airport land to non-airport related uses. • Concern that effort should go into improving rail links rather than the airport and suggested there should be 24 hour bus access. • Support for low carbon air travel aspirations and educational opportunities at Exeter College. • Support for noise impact limitations, but also concern that too much nearby residential development will threaten the viability of the airport and also that the airport will adversely impact on new homes. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Challenges to the existence of an airport, on environmental grounds are noted. However, it does exist, there e is Government/national support for existence and the existence/operation has not been opposed by East Devon District Council. • Proposed plan policy, amongst other matters, seeks to promote greener outcomes in respect of matters over which the Council exercises planning powers. • It is not seen that policy should resist loss of airport land to non-airport uses, noting that the operators/owners will understand operational needs and plan accordingly. • Concerns around impacts on operations at the airport because of possible nearby residential development are noted. The 57db policy reference is designed to address this. • Policy is not designed to address car parking matters and it is considered that the local plan, more widely and in general, has policy to address any planning applications that may be received.

- Concern raised over inappropriate car parking at and around the airport.
- EDAL support the positive tone of this policy and its support for the future operation and growth of the Airport - However, it is considered that greater clarity should be provided in the third paragraph of the policy. This seeks to prevent development harming the role and functions of the Airport, which is supported, but its positioning in the text as a whole and in context following the first two paragraphs might give the impression that it only relates development within the operational boundaries.
- Clyst Honiton Parish Council agreed the policy, however not optimistic about the future of Exeter Airport. They believe the future of Exeter Airport is uncertain, and its closure could have a significant impact on the west end of Exeter. The airport is a major employer and tourist attraction, and its absence could make the area less attractive to businesses and visitors
- Support for employment benefits from the airport and calls for better links to with aviation research and development elsewhere.
- Concern that all land around the airport will be turned into a solar farm.
- A call for a more adaptive policy should the airport no longer be viable.
- The airport would benefit from dry, secure and bookable cycle storage facility to allow travellers to do at least the local parts of their journey by bike.

- As drafted it is suggested that the concerns relating to development beyond boundaries are reasonably addressed, but minor refinement of policy could be appropriate to add clarity.
- The policy is drafted on the basis that the airport will remain operational – should the airport cease to operate (or there be the potential) then there would be a need for a significant thoughts and actions – but these are matters that would fall beyond the local plan and the plan should not consider such a scenario.
- Through green initiatives better cycle parking would be desirable. Though it is not seen that policy changes are needed and matter would be addressed through other policies in the plan.

Key issues raised in consultation: <ul style="list-style-type: none"> No specific issues identified. 	Officer commentary in response: <ul style="list-style-type: none"> No comments.
Sustainability Appraisal	
Key issues raised in consultation: <ul style="list-style-type: none"> See comments at the end of this report. 	Officer commentary in response: <ul style="list-style-type: none"> See comments at the end of this report.
Habitat Regulations Assessment	
Key issues raised in consultation: The HRA work advises: Any increase in traffic or flights could <ul style="list-style-type: none"> have implications for nearby sites, particularly the East Devon Heaths SAC/SPA. However, policy simply outlines support for growth and expansion of the airport and airport related businesses and is too strategic for any impacts to be identified or assessed. 	Officer commentary in response: <ul style="list-style-type: none"> No comments are raised.
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: Strategic Policy WS 05 – Exeter Airport and its future operation and development	
The policy has not been significantly redrafted.	

Strategic Policy 14 – Employment land to the east of airport buildings
Now combined with Strategic Policy 15 to create:
Strategic Policy WS06: Employment land to the east of the airport buildings (Site GH/ED/43, GH/ED/45 and Rock_09a)

This policy allocates land for employment uses, including those that will support the role and function of the aviation industry (given its proximity to the airport)	
Issues and options consultation	
See General Issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • There was support for this policy but a number of respondents were keen to see uses that support the airport. <p>More specific points included:</p> <ul style="list-style-type: none"> • Devon County Council state there is no reference to any required sustainability standards as with other employment allocations. • Clyst Honiton Parish Council was disappointed that a cycle route from Cranbrook to the proposed LDO site was deemed outside of the brief. They believe that the needs of the community should be prioritized over what developers want to provide • Object to loss of agricultural land. • Object to crèche facilities on industrial estates, especially where noise from aircraft can damage babies development. • Must accord with NPs and new NPPF to follow this year • Repeats other employment policies in the plan. • Unclear as to what is meant by non-business uses? 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Policy required clarification as it relates to the area of land adjoining Power Park and not to Power Park itself. • This Policy has now been combined with Former Strategic Policy 15 – Employment land east of the Airport and north of the A30 (below) • Policy encourages uses that would support the airport and aviation industry however it is considered too restrictive to make this the only or preferred use of the site. Restricting uses the site would limit the availability of employment land for wider employment use and potentially lead to a shortfall with no evidence to suggest that there is such a high demand for aviation associated use. • The more detailed sustainability standards apply to employment sites within the enterprise zone • A cycle/pedestrian route to Cranbrook requires land outside the allocation. Access to nearby facilities is referenced in policy as requiring further assessment but there is no certainty that it can be achieved. • Improvement works to the highway (Long Lane and the junctions) is ongoing

- Don't need more employment development around the airport unless it directly benefits it.
- This land is already addressed by an LDO so to some extent the proposed allocation might become secondary to its future development. It will still be possible to make planning applications outside the LDO so it is important that the policy is appropriately framed.
- For clarity the second bullet point of the draft policy should be strengthened and amended to read, "A limited element of uses such as indoor sports, recreational, creche or cafe will be permitted but only where strictly ancillary to the development of the above employment uses."
- The granting of the LDO was a missed opportunity to resolve highways and accessibility issues locally. Even with the addition of a series of limits and controls to the development it allowed it would still have a material negative impact on the operation of the highways network locally. The key junction (Long Lane / B3184) will operate above capacity and with queues at peak times extending back beyond the entrance to the Airport. Weaknesses were also identified in terms of pedestrian, cycle and public transport access. The LDO was nonetheless passed due to the benefits its implementation would deliver.
- The policy should be amended to say "Development proposals for the site must be accompanied by measures to provide fully for its infrastructure requirements. Mitigation will be required to avoid any negative impact on the operation of Long Lane, the B3184, and the junctions along and between these routes."

- Many other comments relate to matters which are covered by other policies in the plan or are outside the scope of the plan.

<ul style="list-style-type: none"> • Solar panels should be required on buildings, rather than using agricultural land for solar • Needs high quality public transport and provision out of usual business hours • Perhaps Power Park could support e-mobility. • Close to airport so better for development than other areas. • Support provision of ancillary uses. • Reference to ensuring that this development is not like Hill Barton for environmental and amenity reasons. • The scheme should not include housing but should provide parkland. • Exeter Airport must confirm that it has the air transport business to meet the building needs and will not have vacant buildings. • Do not permit uses that will impact on local amenity eg odour and noise • Is there evidence as to the scale of need? • We have adequate employment land provision in East Devon, and this adds to the choice and ensures no restraint upon businesses developing here or relocation to our area. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<ul style="list-style-type: none"> • GH/ED/43 – Preferred Allocation • The responses to the question about allocating site GH/ED/43 show a strong focus on transportation and access issues. All comments express concerns about the 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Connectivity concerns are noted. Road improvements. Where possible, will be desirable and site allocation and development offers scope to secure improvements.

<p>site's suitability due to inadequate infrastructure and connectivity.</p> <p>Key points raised, in order of frequency:</p> <ul style="list-style-type: none">• Road infrastructure concerns• Long Lane described as unsuitable for two-way employment traffic• Single track road at this point, requiring widening works• Need for alternative route or road upgrade• Lack of pedestrian and cycling infrastructure• No links to Cranbrook for walking or cycling• Lack of safe pedestrian access• Need for pedestrian/cycle links to be extended to the site entrance• Public transportation issues• Limited frequency of public transport• Transport schedules not coinciding with employment hours• Traffic access concerns• Insufficient recognition of traffic access issues in the allocation <p>Statutory organisations summary</p> <p>Natural England</p> <ul style="list-style-type: none">• Depending on type of development, may trigger Impact Risk Zone for impact on Exe Estuary SPA through any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream. • Also, may trigger Impact Risk Zone for	<ul style="list-style-type: none">• Cycle and pedestrian access improvements would also be desirable through development and could be matter addressed through a master plan.• Policy changes have been set out to address Natural England concerns.• In respect of heritage impact concerns it is considered that in respect of matters of detail these are best addressed through Master planning work for this site as set out under plan policy.• It is noted that detailed heritage assessment work should be a requirement under the masterplan work.
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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 > 750m², manure stores > 3500t).

Historic England

- This site lies a short distance northeast of existing built development at Exeter Business Park, with low level development also located to the southeast of the site. Otherwise, it is within a rural setting with the airport located to the north. As well as the non-designated heritage associated with the airfield, there are numerous listed buildings located to the east including Grade I listed Rockbeare Manor and its associated Grade II Registered Historic Park and Garden. We therefore request that the site is included in the HESA to establish any potential impacts on heritage assets or their settings and to propose mitigation. Should the site be progressed as an allocation, we request that consideration is given to appropriate policy criteria relating to building height and design, having regard to potential impacts on designated and non-designated heritage assets and the open countryside setting.

Devon County Council

- Highways state previous comments in EDDC's consultation site assessment remain applicable. As stated previously, the site is close to an existing employment site

so access may need to be upgraded. Also, the airport access/intersection experiences capacity issues that requires future mitigation. Long Lane intersection saturated and requires mitigating, notwithstanding recent Long Lane improvements.

- Historic Environment state this proposed allocation site lies within an area of archaeological potential with regard to historic built remains and below-ground elements associated with the WWII aerodrome. The Historic Environment Record indicates the presence of bomb craters within the area under consideration, so the presence of unexploded ordnance on the site should not be discounted without further research and/or survey. In addition, there is evidence in the surrounding landscape for the presence of prehistoric archaeological deposits so there is the potential for the site to contain evidence from this period too. 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 planning decision to be made. The programme of work should consist of a geophysical survey and intrusive archaeological field evaluation.
- Economy state this site is supported as an employment opportunity.

<p>Environment Agency</p> <ul style="list-style-type: none"> • Site has some areas at risk of surface waterflooding on site. The site is not served by the main sewer network so would need a private foul drainage system. <p>Non-statutory - Exeter and Devon Airport</p> <ul style="list-style-type: none"> • Object for highways and access reasons. It is extremely unlikely that a new junction with the A30 will be provided. Long Lane improvements do not extend to this site. The LDO land is between the proposed allocation and the junction with the B3184. Traffic from development of the LDO land and the proposed allocation would add pressure to this junction. This is further complicated by the entrance to the Airport being between the LDO land and the junction, and the main Airport car park being accessed at the same junction. The length of queueing at the existing junction is already unacceptable and will be worsened. EDDC needs properly to grapple with the fact that Long Lane - even as improved - is ill suited to support further large scale development, and the junction at the western end of Long Lane cannot cope. The harmful implications of this for the operation of the Airport are very serious indeed. This land should not be allocated. 	
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in assessment:	Officer commentary in response:

<p>To date policy has not been reviewed – but comment on nearby site advised of potential risks : Hydrological effects in-combination (Exe Estuary SPA/Ramsar); Air Quality effects incombination (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar).</p>	<p>Further HRA work will be required.</p>
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Commentary on policy redrafting for the Publication Plan

<p>Redrafted policy title: Strategic Policy WS 06 – Employment land to the east of the airport buildings</p>
<p>Policies 14 and 15 have now been combined as this will enable a masterplan to be prepared for the whole site. This will clearly demonstrate how comprehensive development will be undertaken and implemented, including measures to provide fully for its infrastructure requirements and appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Planning permission will not be granted for any individual parcel of land in the allocation in the absence of this Masterplan.</p> <p>With regard to the policy text, it now makes it clear that it applies to the land adjoining Powerpark rather than the Powerpark LDO site. It has been reworded to clarify the acceptable uses, that ancillary uses must be secondary to the main uses, that the necessary infrastructure requirements must be provided in full, that additional traffic must not negatively impact on the operation of the highway and that various assessments will be required to support detailed proposals.</p>

Strategic Policy 15 – Employment land east of the Airport and north of the A30

<p>This policy allocated land for employment uses, particularly those that will support the role and function of the aviation industry (given its proximity to the airport). It has now been combined with the previous policy (now referred to as Strategic Policy WS06- Employment land to the east of the airport buildings)</p>

Issues and options consultation

See General Issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Land east of the Airport was generally felt to be a suitable location for employment development, especially if uses were related to the airport. A need for greater clarity in the wording of the policy was raised by several respondents, as were concerns at the lack of public transport, distance from settlements and general increase in traffic generated by the uses. • More specific points included: • Devon County Council state there is no reference to any required sustainability standards as with other employment allocations. • DCC state other uses like education/training should be referenced, noting the Skills Academy and aeronautical engineering opportunities. • Policy wording is difficult to understand • Restoration of rail links within East Devon and increased capacity is preferable to development of the airport • No childcare this close to the airport as noise affects children’s development • Support quality office space/B uses • This employment development should not be used to justify a new town. • This must accord with the NPPF and NPs. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • These issues were considered in combination with responses to the above policy- Strategic Policy 14 – Employment land to the east of airport buildings • As the sites lie adjacent to each other, have similar characteristics and will require the same infrastructure improvements a comprehensive scheme is considered to be preferable to this sites being developed independently. This will improve viability and ensure that employment uses are brought forward in a timely and consistent manner. For this reason a masterplan will be required for the site/s previously covered by Policies 14 and 15, and both will now be covered by Strategic Policy WS06: Employment land to the east of the airport buildings (Site GH/ED/43, GH/ED/45 and Rock_09a)

- Repeats other employment policies.
- Exeter Airport has good public transport to Exeter but not the wider District.
- Support to a (quite rightly) diminishing aviation sector is outdated and inappropriate to current and future climate change targets.
- Support development related to the aviation sector.
- Reference to “A limited element of B8” is imprecise and needs to be clarified. Clarify how to interpret to avoid the site simply becoming a distribution park.
- Reference to the development of “Sui-generis uses which comply with this policy” is imprecise. Clarity should be provided in terms of what this means and how it should be interpreted.
- The fourth bullet point of the draft policy should be strengthened and amended to read, “A limited element of uses such as indoor sports, recreational, creche or café but only where strictly ancillary to the development of the above employment uses.”
- Reference to the promotion of active travel measures should be strengthened and amended such that the provision (rather than just promotion) of active travel measures is required, along with associated infrastructure; the same should be required for public transport.
- Any development of the site should be required to mitigate fully its highway impact. The site and Strategic Policy 14 / LDO land will place pressure on Long Lane, the B3184, and the junctions along and between these routes. Silver Lane was also mentioned.

<ul style="list-style-type: none"> • The granting of the LDO was a missed opportunity to resolve highways and accessibility issues locally. Even with the addition of a series of limits and controls to the development it allowed it would still have a material negative impact on the operation of the highways network locally. The key junction (Long Lane / B3184) will operate above capacity and with queues at peak times extending back beyond the entrance to the Airport. Weaknesses were also identified in terms of pedestrian, cycle and public transport access. The LDO was nonetheless passed due to the benefits its implementation would deliver. • The policy should be amended to say “Development proposals for the site must be accompanied by measures to provide fully for its infrastructure requirements. Mitigation will be required to avoid any negative impact on the operation of Long Lane, the B3184, and the junctions along and between these routes.” • Do not permit uses that will impact on local amenity e.g. odour and noise • Solar generation would be a better use for this land • The land near the airport should be used for a wider range of uses - limiting to the wording above is likely to make it unviable • No need for this development/employment allocations are already excessive. 	
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Supplementary Regulation 18 consultation Spring 2024	
Key issues raised in consultation: N/A	Officer commentary in response: N/A

Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in assessment: To date policy has not been reviewed – but comment on nearby site advised of potential risks : Hydrological effects in-combination (Exe Estuary SPA/Ramsar); Air Quality effects in combination (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar).	Officer commentary in response: Further HRA work will be required.
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: New combined policy Strategic Policy WS06: Employment land to the east of the airport buildings (Site GH/ED/43, GH/ED/45 and Rock_09a) See Previous Section of Report	
Policies 14 and 15 have now been combined as this will enable a masterplan to be prepared for the whole site. This will clearly demonstrate how comprehensive development will be undertaken and implemented, including measures to provide fully for its infrastructure requirements and appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Planning permission will not be granted for any individual parcel of land in the allocation in the absence of this Masterplan	

NEW POLICY

Strategic Policy WS 07: Employment land north of the Airport, adjoining Treasbeare (Clho_09)

This policy allocates land for general employment uses on land to the north of the airport, adjoining the Cranbrook Treasbeare expansion area

Issues and options consultation

See General Issues above.	
Draft Plan consultation	
Key issues raised in consultation:	
This site was not consulted on at Draft Plan stage.	
Supplementary Regulation 18 consultation Spring 2024	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Clho_09 – Rejected Site • Responses to the question about not allocating site Clho_09 show mixed opinions, with some supporting the decision not to allocate while others express disappointment. The main concerns revolve around infrastructure, overdevelopment, and archaeological considerations. <p>Key points raised, in order of frequency:</p> <ul style="list-style-type: none"> • Infrastructure concerns • Need for expansion of sewage works to reduce pollution risks • Lack of adequate road infrastructure and links to Cranbrook • Support for non-allocation • Perception of overdevelopment in the area • Belief that better options are available elsewhere (e.g., Skypark area) 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • At the time of the consultation it was recommended that the site should not to be allocated, primarily due to a lack of safe highway access and concern that there was already a substantial quantum of employment land allocated in the vicinity of the airport. • On further reflection, and based on feedback to the consultation, the site is now allocated for general employment (as this will meet a wider need that the other airport allocations which focus on aviation and technology related industries). Access details and other important matters such as archaeology and floodrisk will be subject to further assessment as part of the detailed planning proposals for the site.

- Archaeological considerations
- Potential for WW2 airfield remains and earlier archaeology.
- Preference for non-allocation from an archaeological perspective
- Disappointment with non-allocation
- Belief that the site could be suitable for employment use, especially given adjacent housing development

Statutory organisations summary

Devon County Council

- Highways state whilst previous comments remain, the neighbouring Treasbeare site now has a signed s106 agreement and therefore an agreed access onto London Road. In principle, this may offer a form of access to the site in the future, subject to policy compliancy and lawful right of access.
- Historic Environment state any impact upon the historic WWII airfield should be mitigated by a programme of archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be destroyed by the proposed development. This should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority.
- Economy state that if this site were to come forward as an employment site, it will reduce the size of Exeter Airport

<p>and be a shrinking of the Airport therefore removing capacity for any future expansion.</p> <p>Environment Agency</p> <ul style="list-style-type: none"> • The text should also acknowledge flood risk would also have been a reason to reject the site 	
<p>Farr_01 – Preferred Allocation</p> <ul style="list-style-type: none"> • The responses to the question about allocating site Farr_01 show mixed opinions, with concerns about over-development and infrastructure balanced against the site's existing development and potential suitability for employment use. <p>Key points raised, in order of frequency:</p> <ul style="list-style-type: none"> • Concerns about expansion and over-development • Fear of further expansion into Farringdon Parish • Worry about changing the agricultural nature of the area • Perception of too many industrial areas already present • Existing development and suitability • Site already has some development • Viewed as isolated and not suitable for other uses • Considered appropriate for employment use as a brownfield site • Environmental considerations • Need to protect and retain existing tree belts to reduce visual impact • Archaeological potential 	<ul style="list-style-type: none"> • The points raised in feedback are noted. • The site is however close to Cranbrook and loss of farmland is seen as inevitable in order to accommodate development. • The site is seen to provide choice in employment land options and is close to good roads. • Water issues are addressed in policy drafting. • Detailed transport and heritage concerns will be addressed under other plan policies, noting in respect of transport that major development close by will be of strategic relevance. • Concerns about allocation for employment are noted.

- Site has medieval origins and archaeological potential
- Suggestion for mitigation through evaluation and recording
- Infrastructure concerns
- Lack of adequate infrastructure to access the area

Statutory organisations summary

Natural England

- Depending on type of development, may trigger Impact Risk Zone for impact on Exe Estuary SPA through any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream. • Also, 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 > 750m², manure stores > 3500t).

Devon County Council

- Highways state previous comments in EDDC's consultation site assessment remain applicable. As stated previously, the site is close to an existing employment site so access may need to be upgraded. Also, the airport access/intersection experiences capacity issues that requires future mitigation.
- Historic Environment state Wares Farm is first recorded in the mid-15th century and this proposed allocation area

<p>may contain archaeological and artefactual evidence associated with the medieval settlement here. The impact of development upon the archaeological resource here should be mitigated by a programme of archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be destroyed by the proposed development. This should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority.</p> <ul style="list-style-type: none"> • Economy state the site is not supported from an employment perspective. DCC’s aim is to concentrate new employment land close to existing employment to ensure a clustering effect and critical mass of activity, including transport accessibility. <p>Environment Agency</p> <ul style="list-style-type: none"> • Site is shown to have areas at risk of surface water flooding across site. These risks will need to be assessed to determine how the site can be developed without increasing risks. These areas could provide opportunities for BNG and Green/Blue infrastructure creation. The site is not served by the main sewer network so would need a private foul drainage system 	
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p>	<p>Officer commentary in response:</p>

<ul style="list-style-type: none"> • Policy will need to be assessed – not done yet. 	<ul style="list-style-type: none"> • No comments at this stage.
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>New policy title: Strategic Policy WS 07: Employment land north of the Airport, adjoining Treasbeare (Clho_09)</p>	
<p>Land to the north of Exeter airport, south of the old A30, is allocated primarily for general industrial use reflecting the location on the edge of the airport runway and the associated noise impacts. Storage and distribution will also be permitted provided it can be demonstrated that the new access arrangements and local highway network can safely accommodate the scale and size of traffic to be generated. Recognising site specific considerations, policy requires development proposals to be based on further environmental, heritage and traffic assessment work and appropriate mitigation to be undertaken, if required.</p>	

<p>NEW POLICY Strategic Policy WS08: Employment land opposite the airport buildings, south of the A30 (site Farr_01)</p>	
<p>This policy allocates land for industrial and light industrial employment uses on land to the south of the A30, opposite the airport</p>	
<p>Issues and options consultation</p>	
<p>See General Issues above.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <p>This site was not consulted on at Draft Plan stage.</p>	

Supplementary Regulation 18 consultation Spring 2024	
<p>Key issues raised in consultation:</p> <p>Farr_01 – Preferred Allocation</p> <ul style="list-style-type: none"> The responses to the question about allocating site Farr_01 show mixed opinions, with concerns about over-development and infrastructure balanced against the site's existing development and potential suitability for employment use. <p>Key points raised, in order of frequency:</p> <ul style="list-style-type: none"> Concerns about expansion and over-development Fear of further expansion into Farringdon Parish Worry about changing the agricultural nature of the area Perception of too many industrial areas already present Existing development and suitability Site already has some development Viewed as isolated and not suitable for other uses Considered appropriate for employment use as a brownfield site Environmental considerations Need to protect and retain existing tree belts to reduce visual impact Archaeological potential Site has medieval origins and archaeological potential Suggestion for mitigation through evaluation and recording Infrastructure concerns Lack of adequate infrastructure to access the area 	<ul style="list-style-type: none"> Officer commentary in response: The site is allocated for small business units in industrial use as this will meet a need which is not currently catered for in the vicinity and is appropriate to the size of the site (the other airport allocations focus on aviation and technology related industries). Access details and other important matters such as archaeology and floodrisk will be subject to further assessment as part of the detailed planning proposals for the site

Statutory organisations summary

Natural England

- Depending on type of development, may trigger Impact Risk Zone for impact on Exe Estuary SPA through any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream. • Also, 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 > 750m², manure stores > 3500t).

Devon County Council

- Highways state previous comments in EDDC's consultation site assessment remain applicable. As stated previously, the site is close to an existing employment site so access may need to be upgraded. Also, the airport access/intersection experiences capacity issues that requires future mitigation.
- Historic Environment state Wares Farm is first recorded in the mid-15th century and this proposed allocation area may contain archaeological and artefactual evidence associated with the medieval settlement here. The impact of development upon the archaeological resource here should be mitigated by a programme of archaeological work that should investigate, record and analyse the

<p>archaeological evidence that will otherwise be destroyed by the proposed development. This should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority.</p> <ul style="list-style-type: none"> Economy state the site is not supported from an employment perspective. DCC’s aim is to concentrate new employment land close to existing employment to ensure a clustering effect and critical mass of activity, including transport accessibility. <p>Environment Agency</p> <ul style="list-style-type: none"> Site is shown to have areas at risk of surface water flooding across site. These risks will need to be assessed to determine how the site can be developed without increasing risks. These areas could provide opportunities for BNG and Green/Blue infrastructure creation. The site is not served by the main sewer network so would need a private foul drainage system 	
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> Policy will need to be assessed – not done yet. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> No comments at this stage.
<p>Commentary on policy redrafting for the Publication Plan</p>	

New policy title:

Strategic Policy WS08: Employment land opposite the airport buildings, south of the A30 (site Farr_01)

Land south of the A30 will be allocated for small business or start up units. These units will offer flexibility and meet a need for smaller, less expensive premises, that will not otherwise be met on employment land in this area. Occupiers may offer supporting services to nearby residents and businesses at the airport.

Strategic Policy 16 – Green infrastructure and the Clyst Valley Regional Park

Following the officer review of feedback from the July 2024 consultation it is proposed to split this policy into 2 policies – the first setting out the requirement to provide multi-functional Green and Blue Infrastructure (in accordance with the NPPF, National Design Code and Natural England Green Infrastructure Framework), and a second Strategic Policy which is focused on the specific function of the Clyst Valley Regional Park (CVRP) in relation to its expanded boundaries.

Green Infrastructure (and Blue Infrastructure) are an essential part of the functionality of the environment, sustainable development, nature recovery and transition to a zero-carbon economy. These policies seek to ensure that Green Infrastructure is considered from the outset and integrated into all development in East Devon, in accordance with the NPPF and National Planning Policy Guidance, and Natural England's GI Framework, and support the delivery of the CVRP masterplan.

The NPPF defines Green Infrastructure as '*a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.*' (Glossary, National Planning Policy Framework, 2021).

Natural England’s Green Infrastructure Framework states that ‘Good quality Green Infrastructure (GI) has an important role to play in our urban and rural environments for improving health and wellbeing, air quality, nature recovery and resilience to and mitigation of climate change, along with addressing issues of social inequality and environmental decline.’

The proposed policy has been restructured to set out a policy which focuses on Green and Blue Infrastructure throughout East Devon, and second specific policy which is focused on the Clyst Valley.

Clyst Valley Regional Park

The concept of the Clyst Valley Regional Park originates from the Green Infrastructure Strategy (Exeter & East Devon Growth Point, 2009) and was incorporated as a strategic policy in the previous Local Plan. The diagram below is taken from the GI strategy and shows the concept of the ‘Clyst Meadows’ as a “well defined network of accessible semi-natural greenspaces and less accessible biodiversity rich areas...creating a strong buffer between [Exeter] and the countryside”. The Strategic Policy will

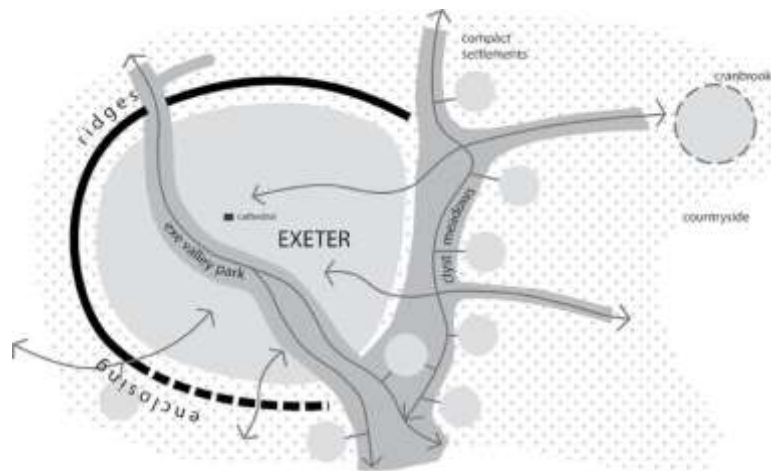


Figure 1 Concept of 'Clyst Meadows'

The key purpose of the Clyst Valley Regional Park is to provide connected multi-functional Green Infrastructure that delivers ecosystem services follows the Clyst Valley along the eastern edge of Exeter. The Regional Park will connect communities and employment areas with the important landscapes and habitats in the Clyst Valley; supporting health and wellbeing, active transport and economic prosperity. The Regional Park will comprise a number of greenspaces linked by greenways. There is no intention that the whole of the Regional Park will become accessible to the public, as most of it is in private ownership. However, 762 hectares is currently accessible and the ambition is to increase that by a further 740 hectares over 25 years. A large proportion of the Regional Park is within the National Trust’s Killerton estate and 40% of the Regional Park is within a floodplain.

Issues and options consultation

<p>We asked about the importance of promoting health and wellbeing throughout the local plan.</p> <ul style="list-style-type: none"> The majority of the respondents (82%) felt it is important to promote health and wellbeing throughout the Local Plan. The written comments mostly related to the Covid-19 impact, both physically and mentally. General comments supported preserving and maintaining open space and access to the natural environment. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> There is strong evidence, and it is widely understood, that access to green and blue spaces and nature has important direct and indirect health and wellbeing benefits. Principle 2 of the Natural England Green Infrastructure Framework states that <i>‘Green neighbourhoods, green / blue spaces and green routes support active lifestyles, community cohesion and nature connections that benefit physical and mental health, wellbeing, and quality of life. GI also helps to mitigate health risks such as urban heat stress, noise pollution, flooding, and poor air quality.’</i> It is important that Green Infrastructure providing these benefits is integrated into developments from the outset, in accordance with National Planning Policy Guidance, and that the achievement of Natural England Accessible Green Infrastructure Guidance is essential to ensure equal and inclusive access for all (regardless of physical ability or access transport).
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	<ul style="list-style-type: none"> • As set out in National Planning Policy Guidance, multifunctional Green and Blue Infrastructure provides wider benefits which also support health and wellbeing, including: <ul style="list-style-type: none"> • Building a strong and resilient economy • Achieving well designed places • Promoting safe and healthy communities • Mitigating climate change, flooding and coastal change • Conserving and enhancing the natural environment • GreenInfrastructurePrinciples.pdf (naturalengland.org.uk)
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p>	<p>Officer commentary in response:</p>
<ul style="list-style-type: none"> • The Clyst Valley Regional Park, established originally through policy of the currently adopted local plan forms a landscape scale green space area within which major development proposals sit. Parts of the park are more formal, albeit of naturalistic nature, while other parts are in farming or other non-developed uses. • The policy intent is to enhance the natural qualities of the park as well establishing outward expansion of the extent of the park, though in the draft policy a potential new boundary was not defined, noting that this would be in work to follow. 	<ul style="list-style-type: none"> • The review of the Regional Park Boundary has been undertaken with consideration of the emerging Local Plan and with reference to a number of existing background studies and existing information, including (but not limited to), the adopted Clyst Valley Regional Park masterplan, EA Flood Mapping, Local Nature Recovery network and nature conservation designations, Heritage Assets, and the Clyst Valley Regional Park Landscape Character Assessment. • The previous Regional Park boundary is proposed to be extended to connect watercourses and important habitats within the Clyst Valley, include landscape features such as historic orchards and the setting of historic assets and to align with clear and easily definable boundaries. • Within the area of the proposed new community to the west of Farringdon the Regional Park boundary is proposed to be defined through the masterplanning process, with multi-functional Green

	<p>Infrastructure corridors that follow watercourses through the community and provide active transport and habitat connections.</p> <ul style="list-style-type: none"> • • A number of small areas are proposed to be deleted from within the adopted Regional Park boundary. These include areas within Cranbrook, Clyst St Mary and the Enterprise Zone where development has been implemented, and minor adjustments to reflect other local plan allocations and the Cranbrook masterplan.
<ul style="list-style-type: none"> • Exeter Cycling Strategy- Given the major target of creating 80km of traffic free trails and quiet ways, we would like to see this rephrased as “Creating cycling and walking opportunities...” 	<ul style="list-style-type: none"> • Policy wording amended
<ul style="list-style-type: none"> • A number of respondents saw the policy (provision of the park) as justification for a second new town and other major developments which they opposed and as such challenged the need, logic or justification for the park/policy. • Some comment received also just expressed opposition more generally to development. • There were, however, also expressions of support for park provision and policy, with respondents noting existing successes of the park. 	<ul style="list-style-type: none"> • The concept of the Clyst Valley Regional Park emerged Exeter & East Devon Growth Point Green Infrastructure Strategy (2009) as summarised earlier. • Green Infrastructure requirements for the new community are set out in the relevant policy (and will incorporate areas of the Clyst Valley Regional Park).
<ul style="list-style-type: none"> • Sidmouth Arboretum welcomes the proposals for the CVRP, particularly raising the canopy cover from 10% to 30%. We note that the Park’s objectives open with the role of true greenness in promoting health and wellbeing. 	<ul style="list-style-type: none"> • Noted

<ul style="list-style-type: none"> Enhanced and more cycle routes were supported in comments but there were also challenges in respect of impacts on walkers/pedestrian safety (on multi-user routes) and costs and long timescale to deliver. 	<ul style="list-style-type: none"> Noted.
<ul style="list-style-type: none"> Public toilet provision was called for in policy. 	<ul style="list-style-type: none"> Public Toilets are provided by East Devon District Council in a number of locations across the district. There are no proposals for public toilet provision in the Clyst Valley (but note public toilets are available in Broadclyst. A number of locations and businesses within the CVRP also offer toilet provision.
<ul style="list-style-type: none"> Barratt Homes support policy and suggest that the northern part of their proposed allocation at Mosshayne Lane will contribute to achieving the objectives set out in the policy. 	<ul style="list-style-type: none"> Noted
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p>	<p>Officer commentary in response:</p>
<p>Exeter City Council and a number of other representations support the expansion of the CVRP to provide a sub-regional area of Green Infrastructure to provide accessible greenspace that benefits the community in East Devon, Exeter and Teignbridge. Devon County Council support the expanded boundary and note the enhanced walking and cycling provision provided by the Clyst Valley Trail. Development in the area should contribute to and connect to this.</p>	<p>The CVRP policy objectives have been amended to retain links to the CVRP Masterplan objectives, as suggested by these comments and additional feedback from Historic England, National Trust, Devon Wildlife Trust etc.</p>
<p>Ref 198 - Teignbridge District Council see the park extension as an important component in relation to the proposal for a new</p>	<p>Noted</p>

<p>community with enhancement to visitor infrastructure needed. The park and proposal will provide scope for managing otherwise adverse impacts in respect of habitat mitigation</p>	
<p>Ref 229 – The Environment Agency welcome the proposal to expand the park. They note it represents a great opportunity to achieve good ecological status for the River Clyst, but advise challenges to achieve this are huge.</p>	<p>Noted. The CVRP policy objectives have been amended to refer to the ecological status of the River Clyst</p>
<p>Ref 116 - Agents for the Cherwell Group advised that they were supportive of the Clyst Valley Regional Park and set out that it would function within the context of land they are promoting at Axehayes Farm for development that falls within the new community boundary. They advise the park will provide Green Infrastructure for their proposed mixed-use development.</p>	<p>Noted</p>
<p>Natural England support the policy objectives for the Clyst Valley Regional Park. Natural England would welcome the addition of biodiversity net gain to policy objective d). The scale of new development in the west of the district may require off-site net gain opportunities to be in the greater Exeter area. Achievement of the Regional Park’s potential will require a bespoke monitoring plan.</p> <p>Natural England advise that a Green infrastructure policy should be developed for across the whole of East Devon (not just the Clyst Valley Regional Park).</p>	<p>The draft policy has been restructured to provide a Green & Blue Infrastructure policy for East Devon, and a specific policy for the Clyst Valley.</p> <p>Reference to BNG included in CVRP policy objectives and in the district wide policy, but primarily covered by the relevant policies in the biodiversity chapter.</p>
<p>Ref 153 – Poltimore House Trust support the inclusion of the Parkland setting of Poltimore within the CVRP.</p>	<p>Noted.</p>

<p>Ref 189 - The National Trust raise the issue that new development will significantly add to population levels in the west of the District and therefore delivery of the Clyst Valley Regional Park is vital to provide access to greenspace. The National Trust is supportive of the objectives as set out within this policy which are broadly consistent with the National Trusts 2020-2025 strategic aims. The Trust provide details in their representation of the work they are doing and its relationship to the Clyst park and wider benefits and outcomes that may result.</p>	<p>Noted. Officers recognise the alignment between the National Trust's Strategic Aims and the Three Rivers Landscape Recovery project and the objectives of the Clyst Valley Regional Park. Officers are working closely with the National Trust to coordinate and align projects and outcomes.</p>
<p>Ref 204 - Historic England support the principle of the CVRP, and particularly support the expansion of land within the CVRP boundary to include the setting of Poltimore House and Rockbeare House and Garden.</p>	<p>Noted.</p>
<p>Ref 214 – Bloor Homes support the principle of CVRP and iterative approach to development of CVRP around and within the new community. Suggest areas to the east of the new community are explored through the masterplanning process.</p>	<p>Noted – the masterplanning process is ongoing and will identify the proposed areas for the CVRP within and around the new community.</p>
<p>Objection to inclusion of freehold owned land in the park</p>	<p>The CVRP is a landscape based designation that includes land belonging to a range of landowners. A number of specific comments regarding land proposed for inclusion with the CVRP and considered below.</p>
<p>There were respondents that considered that the designated area should be bigger and that no development should be allowed on green spaces</p>	<p>The proposed boundary has been developed with consideration of land which meets CVRP criteria and potential future growth areas. It is not intended to be a broader landscape designation which covers a wider area of land outside of Settlement Boundaries. Development within the CVRP will need to accord with the policy A concern was raised that there were some disconnects between watercourses and designated areas.</p>

<p>A concern was raised that there were some disconnects between watercourses and designated areas.</p>	<p>The proposed CVRP boundary has been developed to follow watercourses and align with logical landscape features/boundaries, and to provide clear connectivity between adjacent areas (landscape and walking/cycling).</p>
<p>Concern was raised that some designated areas don't relate to/protect villages and the proposed new town</p>	<p>The CVRP boundary isn't intended to be a Green Wedge that separates villages/towns – it is a landscape designation which promotes multifunctional GI to meet the CVRP objectives. The CVRP Boundary Review Assessment sets out the criteria against which areas are included within the CVRP – simply areas selected must meet the broad requirement of the Green Infrastructure Strategy and Clyst Valley Regional Park Masterplan – that they provide, or could provide, 'connected multi-functional Green Infrastructure that delivers ecosystem services following the Clyst Valley (and its tributaries' along the eastern edge of Exeter.' Land that is not within the River Clyst catchment, or is developed/allocated for development, was excluded from this assessment area.</p>
<p>There were concerns that park would restrict and stifle development opportunities and business expansion.</p>	<p>Green Infrastructure is essential to deliver high quality sustainable development. The CVRP boundary has been developed with consideration of proposed allocations and future development areas (e.g. Science Park, Darts Farm etc) ... many businesses and economic activity (esp farming, forestry, tourism, leisure etc – and activity to support development e.g. SANG/BNG) will be appropriate within the CVRP.</p>
<p>It was highlighted that the park would be good for welfare and wildlife</p>	<p>Noted</p>
<p>The park was identified as offering good access to countryside and undeveloped areas</p>	<p>Noted</p>
<p>There was a view that the area between Clyst St Mary, Clyst St. George and Woodbury Salterton should be included in its entirety in the park</p>	<p>This would not accord with the CVRP criteria as set out in the Boundary Review Assessment.</p>

There was concern about a lack of funding and resources to make the park work and be implemented	It is not intended that the CVRP is accessible open space in its entirety. Accessible space and other projects can be brought forward as opportunity and funding allow.
A respondent advised that they did not understand the consultation (they felt they were being tricked).	The reasons and approach to the consultation were set out in the commonplace website and linked documents.
Specific comments proposing boundary CVRP changes:	
Ref 083 – owners of Higher Burrowton Cottage, Broadclyst who advised their land forms a small holding and they do not want it included in the park.	Removed from within CVRP
Ref 088 (and Ref 114) – Agents for owners of Treasbeare consider that the Clyst Valley Regional Park should not include land at Treasbeare and revert to its former boundary. They are seeking to accommodate Devon Air Ambulance Trust development on part of the park and also they are of the view that an indicative rather than prescriptive boundary for the park should be defined. It should be noted that an agent, Ref 127, also raised the same concerns for Devon Air Ambulance Trust.	The CVRP boundary is amended in this area to reflect the provision of open space/SANG within the Tresbeare development. The proposed Devon Air Ambulance Trust site, on the edge of Exeter Airport, is removed from the CVRP (access to this site may pass through the CVRP, but this would be acceptable within the requirements of the Strategic Policy).
Ref 114 - Agents promoting a strategic scale development south of the A3052 object to inclusion of small area of land in the park where they advise a road access is required.	This land is within the River Clyst/Grindle Brook floodplain and meets the criteria for inclusion in the CVRP. The proposed development is not allocated in the emerging Local Plan, but should access be required the CVRP policy would not preclude this.
Ref 118/127 – Objection to expansion of CVRP to include land south of Tresbeare expansion area as conflict with Cranbrook Plan and an additional layer of Development Plan. Suggest would prevent alternative land uses at Tresbeare Farm and outbuildings.	Rationale for expanded CVRP boundary is set out in the Boundary Review Assessment. Tresbeare Farm and outbuildings are excluded from within CVRP boundary.
Ref: 126 - Objection to the southward extension of the park boundary to include land at Darts Farm. It was advised that Darts Farm is home to a wide range of businesses and the land in	The CVRP boundary is amended in this area to reflect the area which the consultee advised would impact on the operation of Darts Farm.

<p>question is used for a range of activities and inclusion will curtail existing functions. The respondent suggested an alternative boundary and advised of support for the Clyst Valley Trail through their land.</p>	
<p>Ref 128 – request to remove land at Sowton from within CVRP.</p>	<p>This land is largely in floodplain or provides setting to CVRP to the north of Clyst St Mary.</p>
<p>Ref 160 – objection to inclusion of land at Pinhoe (Old Park Farm) within CVRP</p>	<p>This land is already enclosed by the CVRP on all sides, and is an important part of the setting of Poltmore House and Gardens.</p>
<p>Ref 189b – National trust request that CVRP boundary is amended around Exeter substation and for additional land to be included to the west of Higher Comberoy Farm to enhance connectivity.</p>	<p>Boundary to be amended to reflect these comments whilst maintaining connectivity at Exeter substation.</p>
<p>Ref 209 – Agents acting for Greendale raise objection to inclusion of the park in areas of land shown as areas A and C on the plan alongside. But see are B as compatible with their development proposals. They raise concerns however around: Lack of prior engagement with landowners of land in the park; and Lack of objective evidence and assessment to inform areas for inclusion in the park. The principle of park provision is generally supported.</p>	<p>Support for the principle of the CVRP is noted. The criteria for inclusion of land within the CVRP, and assessment of areas included, is set out in the CVRP Boundary Review Assessment. Part of the land within the areas identified (A & C have been removed from the proposed CVRP boundary. Higher land at to the east and adjacent to Crealy Copse in the west have been retained within the proposed CVRP boundary to maintain connectivity with adjacent landscape areas and include the prominent landscape feature at Windmill Hill.</p>
<p>Agent acting for landowner Mr Andrew Cork objected to inclusion of land Newcourt Barton, Clyst Rd EX3 0DB which comprises of an established business park of predominantly industrial units and yard spaces. It is requested that the land is removed.</p>	<p>The majority of this land within the CVRP in this location is within floodplain, and the remainder is the landscape setting for the River Clyst to the east of Clyst Road. The land within the proposed CVRP boundary does not have consent for business uses.</p>
<p>A location map was not provided, but a respondent advised - This boundary change appears to be intended to encompass half of my property including my out buildings, greenhouse and stables.</p>	<p>We would offer no response as location is not clear.</p>

<p>Once again the 'consultation' process does not appear to be consulting us, the owners of the property.</p>	
<p>Sustainability Appraisal</p>	
<p>Key issues raised in consultation:</p> <p>Preferred alternative: Option B. Expand the existing Clyst Valley Regional Park boundary.</p> <p>Reasons for alternatives being preferred or rejected: Option A. Retain the existing Clyst Valley Regional Park boundary from the adopted East Devon Local Plan 2013-31 is rejected because, despite many positive effects, the alternative (Option B) is likely to have even greater sustainability benefits. Option B. Expand the existing Clyst Valley Regional Park boundary is preferred because of the range of positive effects across the range of social and environmental objectives.</p>	<p>Officer commentary in response:</p> <p>The purpose of the Clyst Valley Regional Park is to provide connected multi-functional Green Infrastructure that delivers ecosystem services follows the Clyst Valley along the eastern edge of Exeter – with a range of sustainability benefits. The objectives of the CVRP aim to enhance biodiversity, improve water quality, increase canopy cover and connect communities and employment areas with the important landscapes and habitats in the Clyst Valley; supporting health and wellbeing, active transport and economic prosperity.</p> <p>The expanded CVRP boundary will increase the opportunities to deliver these positive sustainability benefits, and support future climate change adaptation and mitigation</p>
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <p>The HRA advised in comments: Environmentally positive and aims to reduce recreation pressure from other areas. Policy therefore not taken into account within the screening in accordance with People Over Wind. Supporting text could be improved in future iterations of the Plan by removing the now dated reference to Natura 2000 sites and replacing with 'Habitats Sites' or 'European Sites'.</p>	<p>Officer commentary in response:</p> <p>There is great potential for land within CVRP to assist with mitigation of impacts on internationally protected habitats – e.g. through the provision of SANG and alternative green spaces, which reduce recreation impacts The CVRP GI policy specifically supports and prioritises delivery of woodland planting and measures to improve water quality of the River</p>

	Clyst and its tributaries which will have a positive effect on the Exe Estuary SPA
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Commentary on policy redrafting for the Publication Plan

Redrafted policy title:
Strategic Policy WS 09 – Green infrastructure and the Clyst Valley Regional Park

Following the consultation feedback from Natural England, and the broad support for the draft policy, we have updated the policies to provide a District wide Green Infrastructure policy which draws upon Natural England’s Green Infrastructure guidance and has been coordinated with other local plan policies (biodiversity, trees, open spaces, heritage).

The Clyst Valley Regional Park Policy has been amended to focus specifically on the vision and objectives for the Clyst Valley.

The proposed CVRP Boundary has been amended to reflect feedback from the consultation, and co-ordinate with updated site allocations.

Strategic Policy 17 – Development next to the M5 and north of Topsham

This policy provides for mixed use development (housing and supporting uses) on land to the north of Topsham

Issues and options consultation

See General Issues above.

Draft Plan consultation

Key issues raised in consultation:

Officer commentary in response:

- | | |
|---|--|
| <ul style="list-style-type: none">• Devon County Council state the proposed Masterplan should consider the provision of a 1.8 ha primary school site, along with primary, secondary and special education contributions (DCC will consider this allocation alongside the emerging Exeter Local Plan).• DCC state sustainable transport links across the railway will need to be provided, as identified in the emerging Clyst Road Access Strategy.• Exeter City Council stress the importance of joint working with the City Council on the 580 homes to ensure adverse impacts are minimised whilst providing an attractive environment. Development should be coordinated and aligned with nearby development in the city. Policy and supporting text should emphasise that development should be brought forward in accordance with a comprehensive access strategy and should also seek to protect the sensitive Clyst Valley.• Devon Wildlife Trust state - Whilst we appreciate that a masterplan is yet to be produced for this site, we would like to see the inclusion of targets for the creation of local natural habitats included within this policy, in line with the figures provided for new homes and employment land.• Topsham has already endured disproportionate over-development in recent years, and now joins up with Exeter.• The development of sites 91-94 will significantly intensify the traffic along local roads, particularly Newcourt Road, Denver Road and Exeter Road. This will have a negative impact on air quality and safety• The traffic congestion and exhaust fumes of additional traffic are already creating major hazards for residents even before the full effect of the current developments have been felt. | <ul style="list-style-type: none">• In policy redrafting school land of 1.8 hectares is specified.• A link across the railway would be desirable but costs may make this non-tenable.• In policy redrafting joint working with the City Council is highlighted as essential.• Policy in the plan, in general, provides for open space. In this instance policy specific targets are not seen as appropriate.• Whilst concerns around development are noted the site performed well in assessment as an option and it is very close to Exeter.• Highway impacts of development are noted, but technical feedback advises of highway capacity. Policy does call for a comprehensive transport strategy.• Strategic road modelling is being undertaken to inform wider scale impacts of development.• It is noted that development will lead to loss of farmland/green space. Though this needs to be seen within the context that development does need to be accommodated (somewhere) and this site is seen against the backdrop of Exeter/the M5 but the site does not form an area of land that falls directly between and would fill up a space between two urban areas.• A Master plan requirement is set out under redrafted policy. |
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- Newcourt Road should be retained as a low-traffic environment offering an important and safe route for pedestrians and cyclists.
- Topsham has become a high-speed rat run which will be made considerably worse by increased development.
- In addition to traffic concerns, GP services and the local infrastructure are already under considerable strain.
- Otter Valley Association object to this development due to impact on A30, road noise due to proximity to the M5.
- National Highways state evidence is required to understand the transport impact of this proposal on the strategic road network.
- National Highways recommend the policy includes noise and visual intrusion impacts from the M5, to ensure this constraint is picked up in masterplanning and protect the well-being of future residents.
- Exeter Civic Society has objected to the proposed developments in Topsham and Exminster. They believe that the developments would threaten the 'green wedge' and rural aspects of the area, fly in the face of neighbourhood plans, and add to traffic congestion.
- A site promoter strongly supports policy and contends that a masterplanning exercise demonstrates additional capacity that could be delivered early in the plan period - the site includes some existing employment, and this can be expanded and upgraded as part of the delivery of the allocation.
- Object to site at Topsham because of extra traffic along Topsham Road and Clyst Road, impact on landscape

character (including green wedge), and pressure on Topsham facilities.

- Concerned about the loss of green land in their area and The loss of open space will have a detrimental impact on plants and wildlife.
- Placing new houses near roads and stations would be the best solution, it would allow people to have access to public transportation, such as buses and the cycle path, which would reduce the need for cars.
- GP services are under strain, with patients facing long and dangerous wait times.
- The proposed development in Exminster is challenging because it is large and isolated, and there is a risk that it will become a dormitory suburb. The provision of services and facilities will be difficult, and it will require a high degree of commitment to provide a genuinely sustainable solution.
- Topsham is a complex historical town with a mix of different styles of development. The town should be transformed into a green wedge and sports hub,
- Topsham is a village that has lost its boundary with Exeter. It has had a lot of development that is not affordable and cannot cope with any more. The healthcare sector is struggling to cope with the growth of the population, especially as many people retire to the area.
- Topsham has been ruined by recent developments that do not reflect the town's character. Demolish the town and build blocks of flats instead.
- A response was concerned about the impact of traffic and over-development in Topsham. They welcome the idea of a

<p>masterplan, but are concerned that it may not be implemented.</p> <ul style="list-style-type: none"> • The absorption of Topsham into Greater Exeter has eroded the town's historic identity. The loss of the Green Corridor is a major factor in this, and further intensification of this process would be a terrible error. • Make sure that there are pedestrian and cycling paths available. Some people may not want to live so close to the noisy motorway. • A second town in West of East Devon is not needed, as local people do not want it. The demand for homes is coming from people leaving cities, which is putting unnecessary pressure on rural areas. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation: No matters noted.</p>	<p>Officer commentary in response: No matters noted.</p>
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation: The draft HRA work advises of potential risks: Recreation effects in-combination (Dawlish Warren SAC, East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar); Hydrological effects in combination (Exe Estuary SPA/Ramsar); Air Quality in-combination (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar).. In comment it states: Outlines the provision of</p>	<p>Officer commentary in response: It is noted that further HRA related work is needed.</p>

<p>580 new homes and 2.4 hectares of employment land. Transport and pedestrian access to the land, linking to Clyst Valley Regional Park (see Strategic Policy 16). Very close proximity (1.5km) to Exe Estuary SPA/Ramsar and to East Devon Heaths SAC/SPA (7.5km).</p>	
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title: Strategic Policy WS 10 – Development next to the M5 and north of Topsham</p>	
<p>IN recommended policy redrafting the policy is refined to establish the need for formal working with Exeter City Council in respect of infrastructure planning and delivery. A master plan is called on in policy with specific spatial requirements set out for infrastructure provision.</p>	

<p>Strategic Policy 18 – Gypsy and traveller site east of the M5 and south of the Exeter-Waterloo line</p>	
<p>Policy seeks to ensure that the accommodation needs of Gypsies and Travellers are met appropriately</p>	
<p>Issues and options consultation</p>	
<p>See General Issues above.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Most respondents accepted that there is a need for Gypsy and Traveller provision although support for a site in this location was very limited. • More site specific points included: 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • This is a site for relatively small number of pitches (around 5) • Further flood risk assessment work will be required as part of the planning application and the developable area is limited to those areas at lowest risk from flooding, in any case

- Devon County Council support this policy, particularly paragraphs 5.65-68.
- The Environment Agency are pleased the policy acknowledges the need for supporting infrastructure and that the area at risk of flooding needs to be avoided – a flood risk assessment will be required to determine the developable area taking account of climate change. Supporting infrastructure needs to include foul drainage.
- Pinhoe Village residents have submitted a proposal for an alternative 'safe, traffic-free active travel route connecting the communities of Pinhoe, Monkerton and Tithebarn to Pin Brook and Clyst Valley Parks, using paths identified by our communities as historical access points, safeguarding the biodiversity of the wildlife linescape along Pin Brook flood meadows and Pinhoe's Community Field, protecting the character and historical significance of this marshland area.' The submission includes maps of the proposal.
- The site is isolated and not integrated alongside bricks and mortar housing, contrary to policy 8.
- Appropriate provision and facilities (including green space, sanitation, school access and running water) are supported.
- A larger number of small sites, distributed across the District would assist integration
- Very close to areas of flood risk/will increase flood risk. Development will adversely impact by additional new hard surfaces, road infrastructure etc. reducing existing green soak away capacity of this green field site.
- Concerns regarding security, visual impact, waste, litter, parking etc.

- Most other issues will be covered by other policies in the plan or are not matters that are directly relevant
- This site has good highway access from the south, albeit partly on a quite narrow lane, and provides for pedestrian access to a range of services and facilities. The site used to accommodate a piggery that has ceased operating and there are a range of old farm buildings on the site that offer scope for conversion as ancillary accommodation.

- Access to the site is poor for larger vehicles, given the low bridges and the site boundary hedges will be destroyed to create access and visibility. No technical highways assessment is evidenced to support the draft allocation. The sustainability appraisal for the site is out of date, invalid and connectivity distances are now far greater.
- Allocation is premature as needs assessment is still underway.
- No alternative sites have been considered.
- How will provision be made/site separated to accommodate different types of Gypsies and Travellers
- Gypsies and travellers should be involved in these proposals at the outset
- Will the site be funded by EDDC taxpayers or the Travellers living on the site.
- Langaton Lane is a green lane
- Otter Valley Association object to this allocation due to proximity to the M5 and noise exceeding WHO limits.
- National Highways suggest potential noise impacts from the M5 should be considered to ensure noise issues are not experienced by future residents.
- Bricks and mortar housing is unacceptable in this countryside location, Traveller housing should be treated the same way.
- Traveller site should be incorporated into new settlement
- Only one Traveller site is identified. This suggests it was promoted by landowner rather than being chosen as a site alongside strategic growth from a range of options
- Close to area of flood risk, development will reduce existing green soak away capacity and increase run off.

Supplementary Regulation 18 consultation Spring 2024	
Key issues raised in consultation: Not Applicable	Officer commentary in response: N/A
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in consultation: The draft plan HRA advised of potential risks: Recreation effects in-combination (Dawlish Warren SAC, East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar); Hydrological effects in combination (Exe Estuary SPA/Ramsar); Air Quality in-combination (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar). Andin comments set out: Specifically good access to roads for the proposed traveller pitches. Part of the allocated area is floodplain, and any other development here will be resisted. This site is 5.5km from Exe Estuary SPA/Ramsar and 8.5km from East Devon Heaths SAC/SPA.	Officer commentary in response: More specific HRA work will be need as plan making progresses.
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: Strategic Policy WS 11 – Gypsy and traveller site east of the M5 and south of the Exter-Waterloo line	
This site will contribute towards meeting a proven unmet need for further gypsy and traveller provision and there are strong historic ties with the western side of East Devon and gypsy and traveller movement patterns and homes which justify a site in this location. A requirement for a publicly accessible pedestrian link through the site has been added since the last consultation.	

<p>NEW POLICY Strategic Policy WS12: Employment land at Sandygate, between the M5 and Clyst Road (site Clge_07)</p>	
<p>This policy allocates land for small business units in industrial and light industrial employment uses on land at Sandygate</p>	
<p>Issues and options consultation</p>	
<p>See General Issues above.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <p>This site was not consulted on at Draft Plan stage.</p>	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <p>Clge_07 – Preferred Allocation</p> <ul style="list-style-type: none"> The responses to the question about allocating site Clge_07 show a mix of opinions, with concerns primarily focused on wildlife impact and traffic issues. Some see it as a reasonable location for development due to its proximity to existing industrial sites, while others oppose it for various reasons. <p>Key points raised, in order of frequency:</p> <ul style="list-style-type: none"> Wildlife and environmental concerns Impact on wildlife sites and existing nature Interference with existing Green Wedge 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> The site is allocated for small business units in industrial use as this will meet a need which is not currently catered for in the vicinity and is appropriate to the size of the site. Access details and other important matters such as archaeology and floodrisk will be subject to further assessment as part of the detailed planning proposals for the site <p>Transport concerns are noted and the emerging Clyst Road Access Strategy sets out proposals for non-motorised travel in this area towards which, as this site allocation will benefit from the proposals, contributions are likely to be sought towards their delivery as part of the planning application process. As this is not yet available it is not</p>

<ul style="list-style-type: none">• Traffic and access issues• Concerns about difficult two-way access• Proximity to traffic light junction and potential compromise of traffic flow• Archaeological considerations• Site has archaeological potential, particularly related to the Prayerbook Rebellion battle• Mixed opinions on suitability• Some view it as a reasonable location near existing industrial sites• Others see no need for development• Location and accessibility• Good access via A376 and links to M5 noted as positive <p>Statutory organisations summary</p> <p>Historic England</p> <ul style="list-style-type: none">• While the brief site assessment indicates that there is no intervisibility between the site and the Scheduled Monument of Clyst St Mary Bridge, the visibility of any development on the site would ultimately depend on the height and design of that development. This is evidenced by the fact that Sandy Park rugby ground can be seen from the bridge at a greater distance. We therefore request that this site is included in the HESA to further consider its suitability and, if pursued as an allocation, that policy criteria relating to building height and design are included to avoid further impacts on the setting.	<p>reasonable to make it a requirement of policy although it may be added prior to submission.</p>
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Natural England

- Advise depending on type of development, it may trigger Impact Risk Zone for the Exe Estuary SPA through either air pollution any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream.

Devon County Council

- Highways will shortly be publishing a Clyst Road Access Strategy. Its intention is to promote NMU activity on this stretch of the network. Any consented development off this parcel (and in the relevant area) will be required to contribute towards achieving and delivering this strategy. Contributions towards other localised mitigation on the highway network may also be needed.
- The bus stop on the A376 close to Clyst Road will no longer be served by services 9/9A from June due to safety concerns. There will still be a limited service on the 58, but the frequency reduces from half-hourly to six journeys per day.
- Historic Environment state the proposed allocation area lies within an area associated with a 16th century battle and any development here may expose archaeological and artefactual deposits associated with this event. The impact of development upon the archaeological resource here should be mitigated by a programme of archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be

<p>destroyed by the proposed development. This should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority.</p> <ul style="list-style-type: none"> • Economy are supportive of this site as it is close to existing employment sites and has supporting infrastructure. <p>Exeter City Council</p> <ul style="list-style-type: none"> • Exeter City Council supports the identification of additional employment sites within East Devon in the context of ensuring that the needs of the functional economic area are met strategically. There are a number of additional employment sites proposed close to Exeter, in particular modest sites at Sandy Gate and Darts Farm. The City Council would have no objections to these proposals however further collaboration is needed to consider the implications of development at these locations, in particular regarding transportation. Further discussion is also required to consider the relationship between the Sandy Gate site and the potential for residential development north of Topsham as proposed in the previous draft plan. 	
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • As a new policy no assessment undertaken to date. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Noi comments.

Commentary on policy redrafting for the Publication Plan

New policy title:

Strategic Policy WS12: Employment land at Sandygate, between the M5 and Clyst Road (site Clge_07)

This site will be allocated for small business or start up units. These units will offer flexibility and meet a need for smaller, less expensive premises, that will not otherwise be met on employment land in this area.

Recognising site specific considerations, policy requires development proposals to be based on further environmental, heritage and traffic assessment work and appropriate mitigation to be undertaken, if required.

NEW POLICY

Strategic Policy WS13: Employment land at Lodge Trading Estate, Station Road, Broadclyst (site Brcl_27a)

This policy allocates land for industrial and light industrial employment uses as an extension to an existing employment estate at Station Road, Broadclyst

Key technical evidence sources

The key evidence which has informed this Chapter is the Economic Development Needs Assessment [Economic Development Needs Assessment \(January 2023\)](#) which establishes the need for different types of employment land up to 2040, identifies some broad locations and assesses the level of supply at the tie of the study.

Other evidence of note is the Council's Economic Development Strategy [Economic Development Strategy](#), the Economic Review [Local Economic Review](#) and the Employment Land Review [Employment Land Review Exeter & East Devon Enterprise Zone – Accelerating clean growth \(eedez.com\)](#)

A Clean Growth Vision for Development in the West End of East Devon

Issues and options consultation	
See General Issues above.	
Draft Plan consultation	
Key issues raised in consultation:	
This site was not consulted on at Draft Plan stage.	
Supplementary Regulation 18 consultation Spring 2024	
<p>Brc1_27a – Lodge trading estate – <i>Preferred Allocation</i></p> <ul style="list-style-type: none"> • The responses to the question about allocating site Brc1_27a in Broadclyst reveal a mix of opinions, with several concerns raised about infrastructure, particularly regarding flooding and traffic. While some see it as a suitable brownfield development, others worry about its impact on the local area and wildlife. • Key points raised, in order of frequency: <ul style="list-style-type: none"> • Traffic and road infrastructure concerns • Existing heavy traffic in Broadclyst • Need for significant investment in bridge and connectivity • Suggestion for a second access point linking to Cranbrook • Flooding and hydrology issues • Common flooding in the area • Need for adequate consideration of hydrology and flood prevention 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The site is allocated for industrial use. • Access details and other important matters such as archaeology and floodrisk will be subject to further assessment as part of the detailed planning proposals for the site. DCC’s transport requirements have not been replicated in full in the policy as the access arrangements, and any contributions towards the wider NMU provision, will be matters for the planning application •

- Pedestrian and cycling infrastructure
- Poor existing cycle and footpath provision
- Need for safe pedestrian and cycling links to Broadclyst Station and Cranbrook
- Suitability as a brownfield site
- Seen as appropriate due to existing industrial use
- Viewed as a reasonable use of brownfield land
- Wildlife and environmental concerns
- Need for protection of existing fauna and flora
- Concerns about impact on wildlife
- Archaeological considerations
- Potential for archaeological findings, requiring evaluation and recording
- Mixed opinions on necessity and viability
- Some support for development of the site
- Concerns about demand and potential for vacant properties

Statutory organisations summary

Historic England

- Note the potential presence of non-designated archaeology in this area and request that the site is included in the HESA and that the advice of the County Archaeologist is sought to determine the potential level of significance and risk and this will then inform appropriate site boundaries / capacity / layout and policy criteria for any future site allocation.

Natural England

- Advise that the northern part of site contains small slither of a mapped priority habitat Coastal and Floodplain grazing marsh. Suggest onsite verification of the digital mapping (which may be

coarse). Depending on type of development, may trigger Impact Risk Zone for the Exe Estuary SPA through any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream.

Devon County Council

- Highways advise that the nearby Bluehayes parcel, which forms part of the adopted Cranbrook Plan has a resolution to grant planning permission subject to a s106 agreement being signed. Obligations involve the realigning/re-routing of traffic through the Bluehayes parcel from Station Road, to also include future highway works to promote sustainable travel on Station Road that will provide a more non-motorised user (NMU) centric environment along Station Road, in particular the southern section. The County led non-motorised user link from Station Road to Mosshayne Lane also gives more reason to expect a material change in nature of movements along and around this point of the network. DCC Highways would not wish to see any development come forward in advance of these being delivered. Any future application/proposal would still need to be assessed to ascertain whether relevant policy can be complied with and the future relationship with Broadclyst Station/Station Road bridge.
- Historic Environment state that aerial photography has identified a circular possible prehistoric or Romano-British ditched enclosure in this area, subsequently built on by the extant industrial estate and the site may contain archaeological and artefactual deposits associated with this enclosure. The impact of development upon the archaeological resource here should be mitigated by a programme of archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be destroyed by the proposed development. This

<p>should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority.</p> <ul style="list-style-type: none"> • Economy support the allocation. <p>Network Rail</p> <ul style="list-style-type: none"> • Advise that any change in land use at this site would need improvements to the fencing. This site is also in part on former railway land and is therefore subject to restrictive covenants. It must be considered when Network Rail has access rights over the development site; access must not be blocked or restricted at any time. The applicant must comply with all post sale covenants in the demarcation agreement and understand the implications this will have on the implementation of this development. <p>Environment Agency</p> <ul style="list-style-type: none"> • Site is partially located within a flood zone. These flood risks will need to be assessed. 	
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • As a new policy no assessment undertaken to date. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Noi comments.
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>New policy title: Strategic Policy WS13: Employment land at Lodge Trading Estate, Station Road, Broadclyst (site Brcl_27a)</p>	

This site forms an extension to an existing, long established business park and it is appropriate to allocate it to enable expansion of existing businesses and establishment of a limited amount of new business.

A significant part of the wider brownfield site is liable to flood, therefore the allocation is limited to that part of the site which is not currently in an active employment use and is outside the floodplain.

There are particular environmental and heritage considerations which will apply to development of the site and these are detailed in the policy. In addition, future highway improvements and new provision for non-motorised users between Bluehayes and Station Road may impact upon access arrangements to the site and this should be taken into account in preparing development proposals.

Due to its proximity and to ensure its safe operation, any development which could impact upon the railway will require improvements to the fencing and access for maintenance.

NEW POLICY	
Strategic Policy WS14: Employment land south of Langdon’s Business Park, Clyst St Mary (site Sowt_15a)	
This policy allocates land for industrial employment uses on land to the south of Langdon’s Business Park	
Issues and options consultation	
See General Issues above.	
Draft Plan consultation	
Key issues raised in consultation:	
This site was not consulted on at Draft Plan stage.	

Supplementary Regulation 18 consultation Spring 2024	
<p>Key issues raised in consultation:</p> <p>Sowt_15a – Preferred Allocation</p> <ul style="list-style-type: none">• The responses to the question about allocating site Sowt_15a show mixed opinions, with some support for the allocation but also significant concerns about traffic, safety, and environmental issues. The site's location within an existing industrial area is seen as both a positive and a potential problem. <p>Key points raised, in order of frequency:</p> <ul style="list-style-type: none">• Traffic and access concerns• Need for traffic lights or a roundabout at Oil Mill Lane/A3052 junction• Existing traffic congestion during peak times• Dangerous access from Oil Mill Lane• Safety issues• Concerns about relocating school children's pick-up point• Near misses at junction with Enfield Farm• Potential suitability• Support for developing the western end only• Seen as a reasonable expansion to adjacent development• Within existing industrial area with no apparent residential impact• Environmental concerns• Smell from pig farm and digester• Noise pollution from digester• Archaeological considerations	<p>Officer commentary in response:</p> <ul style="list-style-type: none">• The site is allocated for employment uses, and will particularly cater for the needs of existing businesses on the existing business park, to expand. Access details and other important matters such as archaeology and floodrisk will be subject to further assessment as part of the detailed planning proposals for the site

- Some archaeological potential, requiring evaluation and recording
- Tree protection
- Support conditional on genuine protection of trees
- Public transport
- Concern about insufficient bus links

Statutory organisations summary

Natural England

- Depending on the type of development, may trigger Impact Risk Zone for the Exe Estuary SPA with any industrial/agricultural development that could cause air pollution (incl: industrial processes, livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 750m², manure stores > 3500t) or any discharge of water or liquid waste of more than 5m³/day to ground (ie to seep away) or to surface water, such as a beck or stream. • Also, may trigger Impact Risk Zone for the East Devon Pebblebed Heaths SPA and SAC if includes Livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 4000m².

Historic England

- Say that while this site is to some extent flanked by buildings and uses of an industrial character, it is also located within a wider countryside setting and in close proximity to a number of Grade II listed buildings. We therefore request that the site is included in the HESA to

make recommendations for mitigation and criteria relating to matters such as building height and design, materials and landscaping to be included in any site allocation policy.

Devon County Council

- Highways state this parcel sits in an area of an established business park, however, also sits in close proximity to Clyst St Mary, the roundabout of which experiences capacity issues during peak times. The immediate access off the A3052 currently entails a right turn lane, however any future development off this parcel would need to involve the reassessment of the suitability of the existing arrangement. Mitigation will be required should the new community be delivered within the area to afford additional capacity on the network in the future.
- 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 support the site as an employment opportunity.

Environment Agency

- Site is near the Enfield Anaerobic Digestion plant which is a regulated site. The site currently has a good record of compliance with its environmental permit. Whilst it does attract regular complaints about noise, the Environment Agency has been unable to substantiate the level of

<p>pollution reported since improvements were made by the operator last year.</p>	
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> As a new policy no assessment undertaken to date. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> Noi comments.
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>New policy title: Strategic Policy WS14: Employment land south of Langdon’s Business Park, Clyst St Mary (site Sowt_15a)</p>	
<p>Land is allocated for employment uses to the south of the existing employment area at Langdon’s Business Park, Clyst St Mary. The site is suitable for small or medium businesses, and expansion of existing businesses in particular will be supported.</p>	

<p>NEW POLICY Strategic Policy WS15: Employment land at Darts Farm (site Clge_23a)</p>	
<p>This policy allocates land for small business units within the operational site of Darts Farm. To complement the adjoining retail use, add value to locally produced goods, and meet an identified need, preference will be given to manufacture of local food and drink products.</p>	
<p>Issues and options consultation</p>	

See General Issues above.	
Draft Plan consultation	
Key issues raised in consultation: This site was not consulted on at Draft Plan stage.	
Supplementary Regulation 18 consultation Spring 2024	
<p>Key issues raised in consultation:</p> <p>Clge_23a – Preferred Allocation</p> <ul style="list-style-type: none"> The responses to the question about allocating site Clge_23a show a mix of opinions, with many seeing it as a reasonable extension of the existing Darts Farm complex. However, there are concerns about traffic, parking, and potential overdevelopment of the area. <p>Key points raised, in order of frequency:</p> <ul style="list-style-type: none"> Suitability due to existing development Site is already developed or used for storage/ancillary employment. Adjacent to existing commercial buildings and Darts Farm complex. Traffic and parking concerns Potential increase in vehicle traffic. Current use as overflow parking for Darts Farm. Concerns about congestion in nearby areas (e.g., Topsham) 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> The site is allocated for small business units in Use Class E(g) for the manufacture or processing of locally grown food and drink products as this will meet a need which is not currently catered for in the vicinity and is appropriate to the size of the site and adjoining uses. Access details and other important matters such as archaeology and floodrisk will be subject to further assessment as part of the detailed planning proposals for the site At their meeting on 1st November 2024 (reconvened from 29th October 2024) Members resolved to allocate Clge_25a as an extension to Dart’s Farm and Clge_23a

- Mixed opinions on development need
- Some see it as necessary for business expansion.
- Others feel the area is already overdeveloped.
- Environmental impact
- Considered unobtrusive if not on agricultural land.
- Low impact on wildlife noted.
- Overdevelopment
- Warning against overdevelopment that might reduce location value.

Statutory organisations summary

Natural England

- Depending on type of development (likely retail), may trigger Impact Risk Zone for the Exe Estuary SPA where there is any discharge of water or liquid waste that is discharged to ground (ie to seep away) or to surface water, such as a beck or stream. • If the development were to affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA would be required.

Devon County Council

- Highways state that the site already accommodates a range of traffic however local network, on the major roads, currently experiences capacity issues. The principle of a modest development may be acceptable, although localised mitigation may be required.

<ul style="list-style-type: none"> • Economy are supportive of this site as it is close to existing employment sites and has supporting infrastructure. • Historic Environment state that proposed allocation area lies within an area where a 16th century battle is recorded and any development here may expose archaeological and artefactual deposits associated with this event. The impact of development upon the archaeological resource here should be mitigated by a programme of archaeological work that should investigate, record and analyse the archaeological evidence that will otherwise be destroyed by the proposed development. This should be achieved by the application of the standard worded archaeological conditions to any consent that may be granted by the Local Planning Authority. <p>Environment Agency</p> <ul style="list-style-type: none"> • Site has surface water flood risks present on site, which will need to be assessed. 	
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • As a new policy no assessment undertaken to date. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Noi comments.
Commentary on policy redrafting for the Publication Plan	
New policy title:	

Strategic Policy WS15: Employment land at Darts Farm (site Clge_23a and Clge_25a)

This site will be allocated for small business units. To complement the adjoining retail use, add value to locally produced goods and meet an identified need in the District, preference will be given to manufacture and processing of local food and drink products (where local is taken to mean grown within a 10 mile radius or within East Devon, whichever is furthest).
 Recognising site specific considerations, policy requires development proposals to be based on further environmental, heritage and traffic assessment work and appropriate mitigation to be undertaken, if required.

Policy omissions from Chapter 5

This section highlights suggested policy commissions received in comment on the plan.

Key technical evidence sources

No specific technical work is highlighted.

Draft Plan consultation

Key issues raised in consultation:

- Savills on behalf of FWS Carter & Sons propose a new motorway service area on the M5 to the north of Exeter, with a report explaining why it should be allocated.
- Landowner submits an employment site for allocation at Oaklands Field, Aylesbeare, adjacent to the A3052 (HELAA 2021 call for sites ref. Mp131fb).
- Concern that there is just too much development proposed in the west of East Devon with impacts on infrastructure needs, provision and current supply. Development is not considered to be meeting or matching local need.

Officer commentary in response:

- Proposals for a service station have been considered but policy provision and site allocation rejected.
- Other suggested allocations of land for development have been rejected.
- Levels of development matters are addressed elsewhere.
- Concerns of medical practices are noted. In future work, especially at the new town, there will be need to look at how planning can help with new provision delivery.
- Policy in the plan is considered appropriate to promote mixed use town development.

<ul style="list-style-type: none">• Pinhoe and Broadclyst medical practice – highlight inadequate provision of and funding for primary care provision.• Concern that strategic approach does not protect existing settlements and existing residents.• The view was expressed that - The celebration of Exeter as the fastest growing city in England is in fact a reflection of atrocious planning and poor leadership.• Need policy to promote mixed use town centres and regeneration, not just mixed use new development.• Local Plan policies should apply to Cranbrook so that the standards and requirements in Cranbrook do not lag behind those elsewhere in East Devon.• A site promoter advocates additional allocations on the edge of Cranbrook, such as at London Road (16/1825/MOUT).• Concerned that Brcl_21 has been overlooked as not shown on the Commonplace interactive map despite being in HELAA.• Stags on behalf of client submit site Upto_04 as a sustainable location close to Exeter for 150 homes, a cycle interchange, highway/transport improvements and a mixed-use space.• Pinhoe Village residents have submitted a proposal for an alternative ‘safe, traffic-free active travel route connecting the communities of Pinhoe, Monkerton and Tithebarn to Pin Brook and Clyst Valley Parks’	<ul style="list-style-type: none">•
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Supplementary Regulation 18 consultation Spring 2024

<p>Employment</p> <p><i>Clge_25 – Rejected Site but noting Clge_25a is now allocated</i></p> <ul style="list-style-type: none"> • The responses to the question about not allocating site Clge_25 show a mix of opinions, with most supporting the decision not to allocate, while one detailed comment strongly advocates for its allocation. The main concerns revolve around preserving green space, agricultural land, and the rural character of the area. • Key points raised, in order of frequency: <ul style="list-style-type: none"> • Support for non-allocation • Desire to preserve green spaces and agricultural land • Perception that enough development is already planned in the area • Importance of maintaining Darts Farm's rural character • Archaeological considerations • Presence of a known prehistoric or Romano-British farmstead enclosure • Preference for non-allocation from an archaeological perspective • Strong argument for allocation • Site described as enclosed by existing development on three sides • Suggestion that it's suitable for innovative businesses • Proposal to allocate at least part of the site now • Environmental and visual impact concerns • Concerns about hedgerow removal 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Those sites which were consulted on and are now allocations are covered above in the allocations policies (rather than in this section as omissions from the Chapter). Policies apply to: <ul style="list-style-type: none"> • Strategic Policy WS 07: Employment land north of the Airport, adjoining Treasbeare (Clho_09) • Strategic Policy WS08: Employment land opposite the airport buildings, south of the A30 (site Farr_01) • Strategic Policy WS12: Employment land at Sandygate, between the M5 and Clyst Road (site Clge_07) • Strategic Policy WS13: Employment land at Lodge Trading Estate, Station Road, Broadclyst (site Brcl_27a) • Strategic Policy WS14: Employment land south of Langdon's Business Park, Clyst St Mary (site Sowt_15a) • Strategic Policy WS15: Employment land at Darts Farm (site Clge_23a and Clge_25a)
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- Site visibility from a distance
- Presence of a public footpath

Statutory organisations summary

Natural England

- Depending Depending on type of development (likely retail), may trigger Impact Risk Zone for the Exe Estuary SPA where there is any discharge of water or liquid waste that is discharged to ground (ie to seep away) or to surface water, such as a beck or stream. If the development were to affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA would be required.

Devon County Council

- Highways state that capacity issues already exist on the nearby roundabout on the A379 during peak hours. However, it appears to have been discounted from upcoming allocations, which DCC welcomes.
- Economy support the site as an employment opportunity.

Clge_39– *Rejected Site*

- The responses to the question about not allocating site Clge_39 show strong support for the decision not to allocate. The main concerns revolve around preserving green spaces, maintaining the rural character of the area, and potential access issues.

Key points raised, in order of frequency:

- Support for preserving green spaces and rural character
- Desire to retain rural areas and agricultural land
- Concern about loss of green spaces
- Perception that development would not be in keeping with the natural environment
- Access issues
- Poor access to the site
- Potential need for significant road improvements and traffic lights
- Agreement with rejection decision
- Perception that development of this land is not locally required
- Support for the reasons given for rejection
- Archaeological and environmental considerations
- Some potential for archaeological and environmental evidence
- Preference for non-allocation from an archaeological perspective
- Preservation of Green Wedge
- Call to maintain the Green Wedge designation

Statutory organisations summary

Devon County Council

- Highways state that the site isn't supported. Constrained approach roads where existing intersection are likely to

cause future safety issues. Likely to contribute to capacity issues on the local network in peak hours.

- Historic Environment state this proposed allocation area lies within a landscape with evidence of prehistoric and Romano-British settlement and may contain archaeological and artefactual deposits associated with this early settlement of the surrounding landscape. 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 planning decision to be made. The programme of work should consist of a geophysical survey and intrusive archaeological field evaluation.
- Economy do not support the site as an employment opportunity as their aim is to concentrate new employment land close to existing employment to ensure a clustering effect and critical mass of activity, including transport accessibility.

Clge_40 – Rejected Site

- The responses regarding the site Clge_40 not being allocated express a mix of views, with some agreement and some disagreement with the decision. The key themes that emerge are:
- Preservation of rural character and agricultural land

- Several express support for not allocating the site, citing the importance of maintaining the rural, agricultural nature of the area and preventing further urbanisation.
- Potential impact on heritage assets and archaeology
- The Devon Archaeological Society notes that the site contains part of a prehistoric or Romano-British settlement site, and that non-allocation is preferable to avoid potential impacts.
- Concerns about increased traffic
- A few respondents raise concerns that developing the site would exacerbate traffic issues in the area, and suggest that any development should be accompanied by improvements to public transport.
- General opposition to further development
- Some comments express a more general sentiment of opposition to any further development in the area, citing the existing level of development.
- Suitability for employment use
- One respondent argues that the site is well-suited for employment use, given its location adjacent to the successful Darts Business Park and Darts Farm complexes. They suggest that at least the western half of the site should be allocated.

Statutory organisations summary

Devon County Council

- Highways state this site is not supported due to the sizeable site/parcel and close proximity to Clyst St George

and Clyst St Mary roundabouts which are a sensitive network that experiences capacity issues. Sits opposite the established Darts Farm that already accommodates high levels of vehicular movements.

- Historic Environment state this proposed allocation area is known to contain a large prehistoric or Romano-British D-shaped ditched enclosure, identified through aerial photography. Given the unknown significance and extent of the archaeological site the Historic Environment Team would recommend that this area was taken out of any consideration for future development. However, if this area is to be considered then the Historic Environment Team would therefore advise that this area is not considered for allocation until the results of a programme of archaeological work has been undertaken to understand the extent significance of any heritage assets within this area. The archaeological work should include of geophysical survey and field evaluation.
- Economy support as an employment opportunity, however state that the highways and historic environment comments should be noted.

Polt_04 – Rejected Site

- The responses to the question about allocating site Polt_04 show mixed opinions, with arguments both for and against the allocation. The main points of contention revolve around the need for a motorway service area,

environmental and historical impacts, and potential benefits for employment and tourism.

- Key points raised, in order of frequency:
- Debate over need for motorway services
- Some argue it's unnecessary due to nearby existing services
- Others see it as a good opportunity for a new service station, especially for HGVs
- Environmental and agricultural concerns
- Potential flooding issues
- Loss of prime farming land
- Impact on nature and the Clyst Valley Park
- Historical and cultural impact
- High archaeological potential
- Concerns about impact on Poltimore House, Killerton, and Broadclyst
- Employment and economic benefits
- Potential for creating employment opportunities
- Support for local food and drink production businesses
- Traffic and infrastructure concerns
- Worries about increased traffic through Broadclyst
- Tourism benefits
- Potential positive impact on tourism

Statutory organisations summary

Devon County Council

- Highways state this is a sizeable parcel they could generate high levels of vehicular traffic. B3181 to the south is sensitive and this site is likely to further cause issues and impacts on the local network. Removal of this site is supported by DCC. However, if this were to be accessed off the M5 and become a replacement services for either J30/J28 services, or both, this would help to reduce the traffic impact at these busy junctions and would be, in principle, supported by DCC.
- Historic Environment state the proposed allocation site contains a known prehistoric or Romano-British settlement site at its southern end and it is likely that there will be other archaeological sites within this area. The area under consideration also lies in proximity to Poltimore House, a Grade II* listed building, and within sight of the Broadclyst Conservation Area. 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 heritage work to understand the significance of any heritage assets affected and enable an informed and reasonable planning decision to be made. The programme of work should consist of a heritage and visual impact assessment, along with geophysical survey and intrusive archaeological field evaluation. Mitigation measures may be required to minimise the visual impact of any development here.
- Economy state Poltimore sites should only be for development in exceptional circumstances i.e. for something bespoke and strategic that would require that

specific location and be very high quality development. We would not support general employment land at these sites. Due to the visual sensitivity of the locality, at a prime gateway into Devon, any development at these sites would need to be of high quality design and with screening and environmental enhancements.

Exeter City Council

- Supports additional employment sites in East Devon for strategic economic area needs.
- Specifically endorses previously discounted Poltimore area allocations due to potential to replace existing Exeter Services at M5 Junction 30. Aligns with Exeter Plan Draft Policy STC8 supporting alternative uses at current services site
- Would remove services traffic from Junction 30
- Improves local and strategic connectivity at key transport node
- Could better accommodate future development traffic from wider sub-region, Exeter and second new East Devon community
- Recommends Poltimore allocation as part of comprehensive strategy to unlock strategic transport improvements.

Pol_t_06 – Rejected Site

- The responses to the question about not allocating site Pol_t_06 show mixed opinions, with a majority supporting the decision not to allocate. The main points of contention

are similar to those for Polt_04, revolving around the need for motorway services, environmental and historical impacts, and potential economic benefits.

- Key points raised, in order of frequency:
- Support for non-allocation
- No perceived need for additional motorway services
- Concerns about size and impact on the area
- Potential negative visual impact on the landscape
- Debate over need for motorway services
- Some argue it's unnecessary due to nearby existing services
- Others see it as a good opportunity for a new service station, especially for HGVs
- Historical and cultural impact
- High archaeological potential
- Concerns about impact on Poltimore House and its park
- Environmental and agricultural concerns
- Potential flooding issues
- Impact on existing agricultural land
- Economic and employment benefits
- Potential for creating jobs and strengthening the local economy
- Location considerations
- Acknowledgment that bridging a motorway could be a good idea, but this specific location is problematic

Statutory organisations summary

Devon County Council

- Highways state this is a sizeable parcel they could generate high levels of vehicular traffic. B3181 to the south is sensitive and this site is likely to further cause issues and impacts on the local network. Removal of this site is supported by DCC. However, if this were to be accessed off the M5 and become a replacement services for either J30/J28 services, or both, this would help to reduce the traffic impact at these busy junctions and would be, in principle, supported by DCC.
- Historic Environment state the proposed allocation site contains a known prehistoric or Romano-British settlement site within its eastern part and it is likely that there will be other archaeological sites within this area. The western part of the site lies to the west of the M5 and within sight of the grade II* listed Poltimore House and associated parkland. Given the sensitivity of this landscape to development the Historic Environment Team would advise that the western parcel of land (west of the M5) is excluded from consideration as part of this proposed allocation area. Given the proximity to Poltimore House, a Grade II* listed building, and being in sight of the Broadclyst Conservation Area the Historic Environment Team would advise that any proposals for development here should be informed and supported by the results of an appropriate programme of heritage work to understand the significance of any heritage assets affected and enable an informed and reasonable planning decision to be made. The programme

of work should consist of a heritage and visual impact assessment, along with geophysical survey and intrusive archaeological field evaluation. Mitigation measures may be required to minimise the visual impact of any development here.

- Economy state Poltimore sites should only be for development in exceptional circumstances i.e. for something bespoke and strategic that would require that specific location and be very high quality development. We would not support general employment land at these sites. Due to the visual sensitivity of the locality, at a prime gateway into Devon, any development at these sites would need to be of high quality design and with screening and environmental enhancements.

Exeter City Council

- Supports additional employment sites in East Devon for strategic economic area needs.
- Specifically endorses previously discounted Poltimore area allocations due to potential to replace existing Exeter Services at M5 Junction 30. Aligns with Exeter Plan Draft Policy STC8 supporting alternative uses at current services site
- Would remove services traffic from Junction 30
- Improves local and strategic connectivity at key transport node
- Could better accommodate future development traffic from wider sub-region, Exeter and second new East Devon community

- Recommends Poltimore allocation as part of comprehensive strategy to unlock strategic transport improvements.

Wood_38 – Rejected Site

- The responses regarding the site Wood_38 not being allocated express a mix of views, with some agreement and some disagreement with the decision. The key themes that emerge are:
 - Concerns about infrastructure and accessibility
 - Flooding and traffic issues on the A3052 during peak times
 - Lack of or limited access to public transport
 - Insufficient road capacity to support additional development
 - Environmental and archaeological considerations
 - The site has some archaeological potential and is within the setting of the Prayerbook Rebellion battlefield of Woodbury
 - Concerns about the impact on the landscape and agricultural land
 - Potential economic benefits and need for employment land
 - Support for the development to provide more jobs and business opportunities in the area
 - Concerns that not allocating the site could hamper commercial development and economic growth in East Devon

- Scale and impact of proposed development
- Concerns that the proposed large-scale development is inappropriate at the present time
- Suggestions to work with landowners to explore a more suitable, smaller-scale solution
- Existing development and the need for further expansion
- The business park has already expanded considerably into the countryside
- Potential for mitigation and integration with the wider area
- Suggestions to incorporate green spaces, landscaping, and visual buffers to soften the impact
- Opportunities to link the development with the Clyst Valley Regional Park (CVRP)

Statutory organisations summary

Devon County Council

- Highways A3052 has capacity issues as already raised, and the proximity of the site presents limited realistic public transport opportunities.
- Historic Environment state the proposed allocation area lies to the south of Windmill Hill, the site of a battle in 1549 fought during the Prayer Book Rebellion, and in a landscape where archaeological investigations have shown the presence of prehistoric and Romano-British settlement activity. While some parts of the site have already been disturbed by previous development parts of the site are still greenfield sites. 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 planning decision to be made. The programme of work should consist of a geophysical survey and intrusive archaeological field evaluation.

- Minerals and Waste say this site is not located within a MSA, as such the minerals planning authority has no objection. The majority of the northern part of the site is located within a Waste Consultation Zone for the Greendale Barton waste transfer and recycling site and therefore Policy W10 of the Devon Waste Plan applies. This policy seeks to protect existing waste management facilities from constraint by non-waste development. The waste transfer station and recycling site could result in odour and noise impacts. The proposed allocation of this site is for employment uses, which is considered to be less sensitive to these impacts, therefore the waste planning authority has no objection but notes there is potential for the creation of inert material during any demolition and construction. Principles of waste reduction and reuse should be considered in the layout, design and levels of any development at this site. The potential for on-site reuse of inert material should be considered, as this will reduce the generation of waste and subsequent need to export waste off-site for management.

<ul style="list-style-type: none"> Economy are supportive of this site as an employment opportunity. 	
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> No matters raised 	Officer commentary in response: <ul style="list-style-type: none"> No comments
Commentary on policy redrafting for the Publication Plan	
By way of observations: <ul style="list-style-type: none"> Need to consider including a generic policy on infrastructure provision (this is supported). Consider whether other natural environment policies should be considered as “strategic”. 	

Sustainability Appraisal
<p>Further work will be needed in respect of feedback on the SA conclusions. Comments on the policies below are however noted.</p> <p>Policy number/title: 9. Strategic Policy – Development within the Enterprise Zone 10. Strategic Policy – Exeter and East Devon Science Park 13. Strategic Policy – Exeter Airport and its future operation and development</p>

<p>Outcome of sustainability appraisal:</p> <p>Preferred alternative: Policies 9, 10, 13</p> <p>Reasons for alternatives being preferred or rejected: Policies 9, 10, 13 are preferred as they will have major economic positive effects, in areas with good connectivity. 10A. Do not expand Exeter and East Devon Science Park – this alternative may have fewer adverse environmental effects, but would also not have the major positive economic effects, so is rejected. 13A. Do not allocate land for development at Exeter Airport – whilst there may be fewer adverse environmental impacts, this alternative is rejected as it would not have major positive economic and connectivity effects from supporting the long term future of the airport as a valued transport and employment hub.</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none">• Endorsement of policies are noted.
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10 Conclusions

10.1 Policy redrafting has been made in the Publication, Regulation 19, Local plan.