

## East Devon Local Plan – Topic Paper

### Chapter 11. Prioritising Sustainable travel and providing the transport and communications facilities we need

Audit trail local plan evolution document and consultation statement

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## Contact details

Planning Policy Team  
East Devon District Council  
Blackdown House, Border Road  
Heathpark Industrial Estate  
Honiton  
EX14 1EJ

Phone: 01395 516551

Email: [planningpolicy@eastdevon.gov.uk](mailto:planningpolicy@eastdevon.gov.uk)

<http://eastdevon.gov.uk/planning/planning-policy/>

To request this information in an alternative format or language please phone 01395 516551 or email [csc@eastdevon.gov.uk](mailto:csc@eastdevon.gov.uk)

## Contents

1	Introduction.....	4
2	The Publication draft of the Local Plan .....	4
3	Summary of proposed redrafting of Chapter 11 of the consultation plan .....	4
4	Issues and options consultation.....	5
5	Draft plan consultation .....	6
6	Further Regulation 18 consultation Spring 2024.....	6
7	Sustainability Appraisal feedback .....	6
8	Habitat Regulation Assessment.....	6
9	Assessment of policies in chapter 11 .....	7
10	Conclusions.....	45

## **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 11 which addresses prioritising sustainable travel and providing the transport and communications facilities we need.

## **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 11 of the consultation plan**

- 3.1 Chapter 11 contains a series of policies on transport and communication facilities. In the consultation draft Local Plan (November 2022) there were a total of nine policies covering these matters.
  - 3.2 Several changes have been made to Chapter 11 to reflect consultation responses and a desire to make the document and policies clear and focussed, avoiding repetition of national policy. This has resulted in two policies being deleted (Policy 69 – Rear Servicing of Shopping/Commercial Development and Policy 70 – Safe vehicular access to sites) as they repeated national policy. Supporting text has also been refined.
  - 3.3 Other key changes from the Draft Plan to the Publication Plan include:
    - the removal of reference in policy to 20-minute neighbourhoods as it is too vague to include in policy; and because it covers a range of topics that are dealt with
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elsewhere in Local Plan policies (such as those relating to housing and employment delivery, community facilities, and open space provision). Therefore, 20-minute neighbourhoods is referred to in supporting text rather than policy, but consider adding specific reference to 20-minute neighbourhoods in the new settlement policy where it is considered to be achievable.

- changes to the transport sites and routes that should be protected from development, to reflect background evidence.
- Minor amendments to the policy on travels plans, transport statements/assessments. Thresholds have not been added to the policy to allow greater flexibility for transport issues to be considered on a case-by-case basis, rather than setting ‘artificial’ thresholds.
- The revised policy removes redundant EV charging point wording, updates data to 2021 census, adopts Local Transport Note 1/20 for residential cycle parking, and adds employment development parking standards.
- Policy on aerodrome safeguarded areas and public safety zones has been clarified to make clear that development which would impact on the operation of safety or navigational systems at the Airport must provide suitable mitigation.
- Updated data regarding East Devon broadband coverage and the latest building regulation standard for Physical infrastructure and network connection for new dwellings.

## 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 Options<sup>1</sup> report from January to March 2021. This included a series of questions that responses and comments were invited on. A feedback report was published<sup>2</sup>, followed by a summary of main issues raised and Officer response.<sup>3</sup>
- 4.2 Question 23 sought views on the importance of new development being located within walking distance of services and facilities. The most popular response, chosen by 43% of people, was option 3 which would enable some growth where existing facilities and services are accessible and have capacity, along with development at a small number of growth areas to be developed with new services and facilities. A significant number of people (28%) chose option 1 to have small clusters of growth in locations within easy walking or cycling distance of existing services and facilities. Just 6% supported the more relaxed option 4 of only ensuring services and facilities are within the same settlement, regardless of walking and cycling distance.

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<sup>1</sup> [issuesandoptionsreport-jan2021.pdf \(eastdevon.gov.uk\)](#)

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

<sup>3</sup> [1f IO\\_Summary of main issues and council response.pdf \(eastdevon.gov.uk\)](#)

- 4.3 Question 24 sought views on a range of other sustainable transport policy objectives, including bus routes, walking/cycling networks, protecting transport sites/routes, and car parking.

## 5 Draft plan consultation

- 5.1 In Draft Plan consultation, sustainable travel and communications matters were addressed in Chapter 11. The feedback report, summarising the issues raised in the consultation can be read here (starting on page 412) [accessible-reg-18-consultation-feedback-report-spring-2023.pdf \(eastdevon.gov.uk\)](#).
- 5.2 Responses were received from the range of government organisations involved in transport, namely Devon County Council (highways authority), National Highways (responsible for the strategic road network), Network Rail (oversee the rail network). Transport issues were also raised by other organisations including Exeter City Council, town and parish councils, Sidmouth Cycling Campaign, and the National Trust. In addition, transport was a common concern from members of the public.
- 5.3 Further detail is contained in the tables for each policy that follow.

## 6 Further Regulation 18 consultation Spring 2024

- 6.1 Policies in the transport chapter were not included in the Further Draft Local Plan consultation.

## 7 Sustainability Appraisal feedback

- 7.1 The draft local plan was supported by a Sustainability Appraisal<sup>4</sup> (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.
- 7.2 The SA noted the transport policies are likely to have major positive effects on minimising carbon emissions, health and well-being, access to services, jobs, and employment, and connectivity and transport. Minor positive effects are noted for several other objectives. There are a few negative uncertain effects, which can be mitigated to reduce their impact.

## 8 Habitat Regulation Assessment

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

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<sup>4</sup> [sa-of-pos-consultation-draft-lp\\_2022.pdf \(eastdevon.gov.uk\)](#)

## **9 Assessment of policies in chapter 11**

9.1 Chapter 11 of the draft plan set out a series of policies that are reviewed below.

General issues raised on Chapter 11

Chapter 11 promotes sustainable transport whilst ensuring the impacts of additional traffic from new development are properly addressed and mitigated.

Issues and options consultation

Question 23 sought views on the importance of new development being located within walking distance of services and facilities. The most popular response, chosen by 43% of people, was option 3 which would enable some growth where existing facilities and services are accessible and have capacity, along with development at a small number of growth areas to be developed with new services and facilities. A significant number of people (28%) chose option 1 to have small clusters of growth in locations within easy walking or cycling distance of existing services and facilities. Just 6% supported the more relaxed option 4 of only ensuring services and facilities are within the same settlement, regardless of walking and cycling distance.

Question 24 sought views on a range of other sustainable transport policy objectives, including bus routes, walking/cycling networks, protecting transport sites/routes, and car parking.

Officer commentary in response:

- Access to services and facilities within easy walking or cycling distance is of key importance and should be reflected in the Local Plan.
- The Local Plan should include policies to promote sustainable travel.

Draft Plan consultation

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Key issues raised in consultation:

- Despite the laudable policies relating to 20-minute neighbourhoods and high quality public transport, the Local Plan will still result in significant additional traffic leading to pollution and congestion, particularly in the western part of East Devon and in Exeter.
- The East Devon AONB team support the requirement for travel plans and assessments for proposals that “might generate substantive scale of additional vehicle movements” to take account of “proximity to environmental designations.”
- The Otter Valley Association would like to see more robust policies to reduce congestion and increase requirement for travel plans. If ‘back lane’ were closed to through traffic it would create safer spaces for walkers and cyclists.
- National Highways support the ambitions regarding sustainable transport and agree that the spatial strategy is fundamental to achieving modal shift, thus maintaining a safe and efficient transport network.
- National Highways suggest identifying the severance challenges caused by the M5 and A30 (as in the emerging Exeter Local Plan).
- Exeter City Council stress the importance of joint working with the City Council, Devon County Council and National Highways. This will need to ensure that appropriate transport provision is made to mitigate development impact and maintain the continued strategic functionality of the local and strategic highway networks. This will also help to ensure that Exeter can continue to play its vital role as the driver of growth for the wider area. They note that more strategic

Officer commentary in response:

- Traffic modelling will provide evidence on the scale of additional traffic arising from Local Plan development, and any mitigation measures that may be required. This will include joint working with Exeter City Council, Devon County Council and National Highways.
- Support for sustainable travel policies is noted.
- It is understood that electric bike batteries are removable, so do not require bespoke charging points.
- Other policies address rural employment and addressing the needs of the ageing population.

<p>interventions may be required, particularly on the strategic road network. Ongoing discussions should feed into coordinated infrastructure planning and infrastructure delivery.</p> <ul style="list-style-type: none"> <li>• New developments should be required to provide not just charging for electric cars but also secure and under-cover charging points (especially in multiple-occupancy dwellings) for electric bikes (not all electric bike batteries are removable).</li> <li>• Clyst Hydon parish council is concerned that the EDDC local plan does not adequately address the issue of transport. The council specifically mentions that the plan does not: Directly address the issue of commuting to work, particularly in more rural areas; Make any plans for workspace development in more rural areas; Discuss the rapidly changing work patterns, which are seeing more people working from home and part-time; Address the needs of the ageing population, who are more likely to need peripatetic support for social, health, and domestic needs.</li> </ul>	
Supplementary Regulation 18 consultation Spring 2024	
Not part of Further Draft consultation	
Habitat Regulations Assessment	
See specific policies	
Commentary on policy redrafting for the Publication Plan	
No additional policies are required as a result of general issues raised on Chapter 11.	

Strategic Policy TR 01 – Prioritising walking, cycling, and public transport	
This policy prioritises walking, cycling and public transport in new development.	
Issues and options consultation	
The Issues and options consultation Question 25 asked about the comparative importance of various facilities. 'Paths for walking and cycling' were identified as being absolutely essential by over 50% of respondents when considering where they would like to live.	Officer commentary in response: <ul style="list-style-type: none"> <li>- support for walking and cycling is noted and addressed in plan policies.</li> </ul>
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• Network Rail support the promotion of sustainable transport with the provision of safe and pleasant cycling and walking routes between services and facilities.</li> <li>• Network Rail must be contacted if there is an increase in use or change to the environment of a level crossing – any increase in risk requires suitable mitigation.</li> <li>• National Highways presume '20-minute neighbourhoods' means an 800m walkable catchment, or a 10 minute walk to destination and 10 minutes back home – this could be made clearer.</li> <li>• Devon County Council (DCC) suggest cross-referencing with net-zero policy and adding the need for easy interchange between active and shared transport modes by using mobility hubs.</li> <li>• DCC note that 20-minute neighbourhoods align with the Devon Carbon Plan.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• Support for sustainable transport is noted.</li> <li>• Agree that greater clarity on what constitutes a 20-minute neighbourhood would be helpful i.e. 800m walkable catchment.</li> <li>• Agree to cross-reference with net zero policy.</li> <li>• Agree to reference the need for an easy interchange between active and shared transport modes by using mobility hubs.</li> <li>• 20-minute neighbourhoods do not lead to monitoring of people's movements.</li> <li>• The 20-minute neighbourhood covers a range of topics and remove reference to 20-minute neighbourhoods from policy, because it covers a range of issues that are already covered elsewhere in the Local Plan, such as housing need, community facilities, and supporting the local economy.</li> <li>• Agree the final paragraph should be removed as it provides a "get-out" clause and is already contained in the NPPF.</li> </ul>

<ul style="list-style-type: none"><li>• DCC question the idea of a new community as it does not limit the need to travel and offer a genuine choice of transport modes.</li><li>• DCC state there should be more focus on sustainable travel in existing settlements.</li><li>• DCC is currently reviewing its policy on Park and Ride sites given the slow uptake of bus travel since the pandemic but support park and change sites on the edge of urban areas.</li><li>• DCC state supporting active travel and reducing unnecessary travel should be considered with regards to addressing the needs of people with disabilities and reduced mobility.</li><li>• The Devon Countryside Access Forum consider that prioritising walking and cycling links should be made clearer, and suggest wording to do so.</li><li>• Sidmouth Cycling Campaign support this policy which prioritises walking and cycling links in new development. However, this policy could be made more effective by defining the features of a “20-minute neighbourhood” that new development will have to incorporate. For instance, that community facilities, such as primary schools and shops, are within a 20 minute walk of all proposed housing.</li><li>• Clyst Honiton Parish Council warns that developers should not rely on public transport to justify their developments, as bus services are subject to change. The council recommends that developers assume that all new residents will use their cars.</li><li>• Need to include e-scooters and buggies in this policy.</li><li>• Cycle routes should link to train stations, so that train and bike journeys are possible.</li></ul>	
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<ul style="list-style-type: none"><li>• Our climate is not conducive to walking and cycling.</li><li>• Do not like 20-minute neighbourhoods as could lead to monitoring of people’s movements.</li><li>• Support policy, need to ensure it is delivered.</li><li>• This policy sounds great in theory but does not happen in practice as existing public transport networks are not adequate, unregulated bus system, uncertainty on CIL funding.</li><li>• Support the principle but the policy itself is vague for example, how does development incorporate a 20 minute neighbourhood, include greater permeability for walkers/cyclists, deliver national target of 50% active travel in urban areas.</li><li>• Housing industry organisation considers the 20-minute neighbourhood concept to be useful but also appropriate to consider the range and variety of development which could help a smaller settlement support more services. Policy is not sufficiently flexible.</li><li>• Also EDDC needs to work on making active travel and public transport quick, easy to use, well maintained, safe and available to all, and therefore more appealing than using a car.</li><li>• No reference to shared transport (I.e. on-street car club and bikes) which are already present in the west end.</li><li>• Support the principle of 20-minute neighbourhoods and the recognition that this may not be achievable in rural areas.</li><li>• Cycling is challenging in East Devon due to its hilly nature.</li></ul>	
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- Need much better public transport links – bus routes have been cut, and trains are unreliable.
- A cycle path should be built between West Hill and Ottery.
- Would like high quality public transport in West Hill.
- Need to prioritise the availability of high quality public transport.
- Need to define the features of a 20-minute neighbourhood such as community facilities.
- Need off-street walking/cycling routes to connect existing settlements, not just where development is happening.
- Need a network of dedicated cycle and walking routes between all main developments and employment areas (Greendale, Hill Barton, Clyst Sy Mary, Science Park etc).
- Strengthen policy to allow all children to cycle off road to school.
- Need more emphasis on rail transport including linking with the Airport and the new town.
- It needs to be made clear that the policy is geared towards residential development, rather than all new development, otherwise there could be conflict with the location of large scale employment which may not deliver a 20-minute neighbourhood.
- Larger developments should consider ultra low emission streets where vehicle movement is restricted except for public transport, disabled vehicles, delivery vehicles, local residents.
- Residents of the proposed new town will not likely have a 20-minute neighbourhood for many years if Cranbrook's experience is repeated.

- Even high quality public transport will not provide a suitable alternative to the car if people are still required to commute to work, for example new housing along the Exe Estuary will be car dependent, concentrating employment land on the western side of the district.
- Site assessments have not applied the 20 minute neighbourhood as criteria on distance to services is 1,600m rather than 800m.
- There is no definition of “larger scale development” or “smaller scale development”.
- There is no definition of “rural” and “urban” areas.
- Walking and cycling routes should be clearly signed.
- Facilities for active travel should be in place before homes are occupied so that sustainable habits are encouraged from the start.
- Delivery of this policy is just as challenging in urban areas as rural areas.
- Remove the last sentence as it will allow developers to not deliver this policy.
- This policy is not deliverable in rural areas with limited job opportunities and facilities.
- Do not restrict car use as many older people rely on cars for their independence.
- This policy contradicts the Local Plan proposals at Hawkchurch, which only has one bus per week and therefore new residents will be reliant on the car to access facilities.

- Support no development at Cowley but would like a cycle route to link with Exeter city centre, the Exe Estuary Trail and elsewhere.
- Enabling walking and cycling will encourage tourists and support the economy.
- Promote the South West Coastal Path.
- Cyclists, pedestrians and cars should be segregated where possible, but this should not be at the expense of any of the three.
- It should be possible for people to live in town centres without needing a car, by improving town centres and/or providing good quality public transport.
- Bus and train services have been reduced following Covid, meaning the car is essential in many cases, so need a more robust approach.
- Losing all minor roads like Langaton Lane only makes some vehicle trips longer.
- Consideration should be given to links between towns, cycling plus increased tourism and traffic
- I believe that EDDC should be bold in its ambition. It should set out very strong DESIGN principles which actually demand that the policies in this plan are adhered to, by prospective applicants (developers), BEFORE the latter submit their applications for OUTLINE planning permission. Waiting to RESERVED Matters to implement policies is, in the vast majority of cases, too late.
- Agents for Bourne Leisure endorse draft Policy 65, which recognises that opportunities to deliver walking and cycling

<p>links and access to high quality public transport in new development will be more challenging in rural areas compared to urban areas</p> <ul style="list-style-type: none"><li>• The National Trust support policy and highlight relevance of Local Cycling and Walking Infrastructure Plans. The National Trust recommend that consideration is given to including the emerging LCWIP, which is being produced by Devon County Council, as an SPD.</li><li>• Exeter Cycling Campaign welcome the commitment to “Protecting transport sites and routes” in the draft but these are largely leisure routes. To deliver a modal shift away from private vehicles the Local Plan should enable a network of new, safe cycle paths that connect up settlements in East Devon to enable journeys for commuting, retail and education purposes, following Department for Transport design guidance and be designed for desired commuter levels (where 50% of journeys are by foot or bike). This is especially important for the proposed new town.</li><li>• The proposed Infrastructure Delivery Plan should give prominence to cycle, walking and bus connections to the new town, and the final choice of location should take into account the public transport options including access to train stations</li><li>• The Local Plan would benefit from proposing adding a new commuting cycle route from Axminster to Seaton (the nearest station).</li><li>• Policy should be more specific and firmer, for example:<ul style="list-style-type: none"><li>a. Walking and cycling paths will have priority across all side roads in new developments, and signalled crossings of major routes will be of single phase.</li><li>b. 20 mph speed limit will be</li></ul></li></ul>	
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<p>the default design (both with signage and road layout) in all new developments. c. Cycle parking shall be designed to be more conveniently located than car parking in residential, retail and educational developments, and should allow for the charging of e-bikes. d. Cycle parking numbers will meet or exceed LTN 1/20-specified numbers. e. Cycle parking design will meet LTN 1/20 standards (e.g. will accommodate non-standard bike forms, be secure, be sheltered, be of Sheffield-stand design). f. To meet the policy statement that walking and cycling links should be “coherent, direct, safe, comfortable and attractive”. It should be a requirement for all new developments that they are connected up to the cycle network. g. Permeability of developments should be higher for those on foot or travelling by bicycle, and this permeability should be maintained across independent developments. For example, in Cranbrook there have been issues where obvious links to networks etc are outside of the planning boundary, so it's too late or difficult to make links better into the development. h. For commercial and employment developments, cycle access and parking as well as showers, lockers should form part of the application to enable those arriving by bicycle to do so safely and conveniently.</p>	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>This policy was not included in this consultation.</p>	
<p>Sustainability Appraisal</p>	
<p>See later in this report</p>	

<b>Habitat Regulations Assessment</b>	
Policy could not have any conceivable effect on a European site – no likely significant effects.	
<b>Commentary on policy redrafting for the Publication Plan</b>	
<ul style="list-style-type: none"> <li>• Policy number amended to reflect new numbering system.</li> <li>• Policy should add reference to the need for an easy interchange between active and shared transport modes by using mobility hubs.</li> <li>• Remove reference to 20-minute neighbourhoods from policy, because it covers a range of issues that are already covered elsewhere in the Local Plan, such as housing need, community facilities, and supporting the local economy.</li> <li>• Policy should focus on “walkable” neighbourhoods, as more relevant to transport.</li> <li>• Remove the final paragraph from the policy as it provides a “get-out” clause and is already contained in the NPPF.</li> <li>• Policy should make clear that segregation of cycle paths from pedestrians will not be appropriate in all cases.</li> <li>• Policy should add reference to development not adversely affecting footpaths, cycleways or bridleways.</li> </ul>	

<b>Policy 66 – Protecting transport sites and routes</b>	
This policy identifies and protects sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development, where there is robust evidence.	
<b>Issues and options consultation</b>	
See General issues above.	
<b>Draft Plan consultation</b>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• National Highways would like discussions and further evidence regarding the bus priority route at A3052/A376 to M5 Junction 30; and park and areas of search at A30/Heavitree Road</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• A transport study will inform the need for mitigation measures such bus priority routes and park and ride, and this evidence will be reflected in the policy.</li> </ul>

corridor, and A376/A3052 Clyst St Mary corridor; due to their interaction with the strategic road network.

- Devon County Council support recognising these routes and protecting them from other development.
- There appears to be an omission in Policy 66 (Protecting transport sites) where there is no commitment to improving existing or adding new train stations.
- Support this policy, let's make sure this happens.
- Explain relationship between Devon County Council and EDDC and complexities of widening transport choice when privately owned bus companies are involved.
- Unclear on what the policy is trying to achieve, cannot understand criteria for specifying some strategic cycle schemes and not others – for example, why is Exe Estuary Trail not listed?
- Exmouth Town Council seek protection of Bapton Valley Park as an evolving walking/cycling route in Exmouth.
- Exmouth Town Council highlighted a local campaign to protect Summer Lane for active travel.
- Exmouth Town Council seek protection of the area around the train station to enable the delivery of an integrated transport interchange.
- Need to protect the cycle route from Knowle to Exmouth, it is enjoyed by many and under threat from Exmo\_17 proposal.
- Strongly support the creation of cycle route between Feniton and Sidmouth, as referenced in the Ottery and West Hill Neighbourhood Plan.
- Strongly support the creation of cycle route between Sidford and Sidbury.

- There is no evidence on the need for new train stations. Improvements to existing stations would be supported and can be delivered outside of the planning system.
- Confusion on the what the policy is trying to achieve is noted, and further explanation will be added that the policy addresses 'new' schemes rather than existing (such as the Exe Estuary Trail).
- Agree that the cycle route from Cranbrook to Exeter (E3) should be added to the policy – it is in the Devon Transport Infrastructure Plan, 2020; Clyst Valley Regional Park Masterplan, 2021 and benefits from planning permission.
- Robust evidence is required to identify and protect sites and routes to widen infrastructure choice and deliver large scale development (NPPF, 106c) – it is not considered that the additional routes suggested meet this evidential requirement.

- Need a safe cycle route between Seaton and Colyton, as roads from Colyford entrance to Seaton Wetlands and Colyton are very dangerous.
- Extend the Seaton to Colyton cycle scheme to Axminster as this is a common route for commuters.
- Sidmouth Cycling CAmpaign support this policy
- Have not mentioned all the Sustrans cycle routes, and the international “Trans Manche” route.
- The Clyst Valley Trail is years away from being delivered so should not be protected.
- Query why the cycle route from Cranbrook to Treasbeare to Exeter has not been protected – does the Clyst Valley Trail include this?
- The Boniface Trail is also partly within East Devon so should be added to the policy.
- Promote duelling of the railway line and/or passing loops to enable a more frequent service.
- Restore Seaton Junction station so it can be redeveloped.
- Need a new light rail link between Seaton Junction and Colyton, then onto Colyford and Seaton shared with the tram.
- Re-instate light rail link from Feniton to Sidmouth, to connect Sidmouth, Tipton and Ottery back to the rail network.
- Redevelop the railway from Exmouth to Exeter to enable it to function as an attractive commuter route.
- Bus priority routes assume there are sufficient, reliable, affordable buses which is not the case.

<ul style="list-style-type: none"> <li>• Allocate a park and ride facility in the north of Sidmouth to cater for additional day visitors causing congestion and lack of car parking.</li> <li>• Park and Rides sites will need electric vehicle charging points.</li> <li>• An ‘urban tram’ is required that runs directly from Park and Ride to central Exeter.</li> <li>• Owner of land on the A377 corridor, Cowley has submitted land and supports its allocation for a Park and Ride site.</li> <li>• Exmouth Town Council note the potential for a Park and Ride at Sowton to serve Exmouth has been overlooked.</li> <li>• Typo as “A4052” does not exist, should state “A3052”.</li> <li>• The National Trust supports the protection of sites and routes that promote sustainable travel, including the Clyst Valley Trail. It would be beneficial if further details could be set out with regards to the Partnership working with Exeter City in respect of the Clyst Valley Trail that are required to ensure connections to the wider active travel network.</li> </ul>	
<p><b>Supplementary Regulation 18 consultation Spring 2024</b></p>	
<p>This policy was not included in this consultation.</p>	
<p><b>Sustainability Appraisal</b></p>	
<p>See detail later in this report.</p>	
<p><b>Habitat Regulations Assessment</b></p>	
<p>Policy could not have any conceivable effect on a European site – no likely significant effects.</p>	

Commentary on policy redrafting for the Publication Plan	
<ul style="list-style-type: none"> <li>• Reflect the findings of the Greater Exeter transport study on the need for mitigation measures such as bus priority routes and park and ride.</li> <li>• Show the sites and routes included in the policy on the Policies Map.</li> <li>• Clarify that the policy addresses ‘new’ schemes rather than existing (such as the Exe Estuary Trail) and will support delivery and protect the potential schemes from development that precludes their delivery.</li> <li>• Delete Seaton to Colyton as the section to Colyford has now been delivered, and there is a lack of justification to protect the route to Colyton.</li> <li>• Delete Feniton to Sidmouth cycle path as would not realise opportunities for large scale development.</li> <li>• Amend typo as “A4052” does not exist, should state “A3052”.</li> <li>• Delete reference to park and ride areas of search at A30/Heavitree Road corridor, and A377 Cowley Bridge Road corridor.</li> </ul>	
Policy 67 – Travel Plans, Transport Statements, Transport Assessments	
This policy sets out criteria for considering the transport impacts and mitigations measures, through the provision of Travel Plans, Transport Statements, Transport Assessments.	
Issues and options consultation	
See General issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• National Highways expect transport evidence to inform the thresholds.</li> <li>• National Highways suggest the policy contains an option to require a transport assessment/travel plan outside any thresholds if necessary, to ensure unforeseen developments that could have transport implications to be addressed.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• Whilst the potential to include thresholds in the policy has been explored, on balance it is considered to allow greater flexibility for transport issues to be considered on a case-by-case basis, rather than artificially setting thresholds.</li> <li>• Agree with separating bullet point 3 into two bullet points.</li> </ul>

- Devon County Council state such supporting documents for developments of a reasonable size and nature are standard requirements. Travel Plans raise awareness and provide opportunities for people to change to more sustainable travel modes.
- This is a good policy, support.
- Travel Plans should encourage people out of their cars and onto the railway, as well as encouraging walking and cycling.
- Support this policy but note that new settlement Option 1 does not comply as it very remote with no public transport.
- No new housing should be built without significant improvements to public transport.
- Bullet point 3 should be separated into two bullet points.
- Exmouth Town Council (ETC) support setting thresholds but these must be evidence-based.
- ETC concerns about limited scope to influence public transport providers.
- Need to ensure transport statements/assessments meet local need and are produced to a minimum standard as they often inaccurate and misleading.
- Sustainable travel needs to be incorporated in new development from the outset to ensure residents use active travel and not cars.
- It is not possible to forecast the amount of vehicle movements that will be generated by a development.
- Exeter Airport Ltd state the policy is imprecise and should include provisions that will apply to development that may

<p>give rise to unacceptable impacts irrespective of thresholds.</p> <ul style="list-style-type: none"><li>• Policy is misleading as does not thresholds on the size of development before transport is considered.</li><li>• Policy is not robust enough; it needs targets and detail on monitoring to ensure aspired levels of sustainable travel are achieved.</li><li>• Cars are necessary in rural areas so road network should be improved to cut travel times.</li><li>• Transport assessments assume bus services will be the same when development has finished which, given cuts over recent years, should not be the case.</li><li>• The extra number of vehicles assumed in new development feels too low.</li><li>• Bullet point 3 should be 2 separate bullet points:<ul style="list-style-type: none"><li>• Proximity to environmental designations</li><li>• Impact on promoting walking and cycling</li></ul></li><li>• Exeter Cycling Campaign have concerns about the efficacy of “Where development schemes generate substantive additional vehicle movements...planning permissions will not be granted....unless a Transport Assessment and Travel Plan identifies measures to secure new sustainable travel arrangements”. Travel Plans and Assessments in new housing developments are often ineffective at nudging people away from using their private vehicle for all journeys, however short.</li></ul>	
Supplementary Regulation 18 consultation Spring 2024	

Not included in this consultation.	
Sustainability Appraisal	
See later in this report	
Habitat Regulations Assessment	
Policy could not have any conceivable effect on a European site – no likely significant effects.	
Commentary on policy redrafting for the Publication Plan	
<ul style="list-style-type: none"> <li>• Do not set thresholds to which policy will apply.</li> <li>• Separate bullet point 3 into two bullet points.</li> <li>• Delete “in the absence of mitigating actions” as the travel plans, transport statement/assessment will, themselves, recommend mitigation measures.</li> </ul>	
Policy 68 – Parking Standards	
The policy set out car and cycle parking standards.	
Issues and options consultation	
See General issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• National Highways generally agree with this policy but require further information with regards to a non-residential parking standard, to ensure parking provision is</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• The EV Charging Points policy duplicates the requirements of the Building Regulations 2010 (Part S of Schedule 1). Therefore, the policy wording regarding these regulations should be removed.</li> </ul>

appropriate to reasonable trip generation assumptions in the transport evidence.

- The Environment Agency recommend this policy should also provide for expansion of EV charging points for existing communities to ensure sufficient infrastructure is in place as society transitions to EVs. This could perhaps include a presumption in favour of new EV charging proposals.
- Devon County Council state each site should have its own parking standards – rural locations will require additional parking spaces, with lower provision in urban areas where there are good sustainable alternatives.
- Devon and Cornwall Police suggest considering designing out crime principles when designing parking provision in new development, for example avoiding large rear parking courts in preference to on-plot parking.
- Lyme Regis Town Council support measures to deliver EV charging but would like reference to need to retro fit or provide community facilities.
- Requiring 1.6 parking spaces for each house assumes car travel will be the norm, so likely to increase CO2 emissions.
- Clyst Honiton Parish Council is concerned that the current parking standard of 1.6 parking spaces per dwelling may not be sufficient, due to narrower roads and unusable garages. This could lead to cars being parked on pavements or too close to each other, which could have health and safety implications.

- The proposed residential car parking standard of 1.6 has received mixed reactions, with some supporting it, others expressing concerns, and some objecting to it. Based on the methodology and the latest 2021 census data, we have updated the residential parking standard to 1.7. Please refer to the supporting evidence for the detailed calculations
- Noted and agreed. The suggestion to follow Local Transport Note 1/20 and adjust the residential cycle parking spaces from 2 spaces per dwelling to 1 space per bedroom has been adopted.
- EDDC will consider preparing a Supplementary Planning Document to establish a comprehensive parking standard, including design guidelines and parking provisions, if required.

- Sidmouth Cycling Campaign support the inclusion of a cycle parking standard in this policy, but suggest it is separated from the car parking standards paragraph. We also recommend replacing the requirement of 2 cycle parking space per dwelling with a reference to the requirements of LTN 1/20. Table 11.1 of LTN 1/20 suggests a minimum requirement of 1 secure space per bedroom. This table also provides guidance on parking standards for non-residential development, which should be referenced in this policy. Provision should also be made for charging e-bikes in residential developments.
- All new housing should make provision for electric car charging points.
- Install electric car charging points in all car parks and explore opportunities in other public spaces.
- Housing in rural areas should have off-road parking for at least two cars, especially with the increase in electric cars.
- No need for policy as included in Part S of the Building Regulations (including where exceptions may apply).
- Flexibility to parking standards based on site location should be kept as in adopted policy TC9.
- Policy should breakdown provision for dwellings to provide clarity.
- A developer states the policy lacks clarity and needs more detailed parking standards which provide a suggested bedroom tenure/car parking spaces breakdown.
- The Avenues Residents Association (Exmouth) advise - Pol 68 appears to be incomplete. The Plan needs this section to be completed properly. The wording used here

<p>is very weak and the Council should be doing more than "liaising", they should provide policy for operators to work to!</p> <ul style="list-style-type: none"> <li>• Exeter Cycling Campaign state parking policy needs to be strengthened for cycle parking standards. The Local Plan should commit to the national guidance minimum cycle parking numbers laid out in LTN 1/20 of one cycle parking space per bedroom rather than the proposed 'per dwelling'. The local plan should mandate that this cycle parking must meet LTN1/20 standards for design, convenience and minimum numbers.</li> <li>• The proposed car Parking standard is too low for East Devon, especially for rural area. And some comments suggest it should be more flexible to reflect the different needs of different areas and household.</li> <li>• The policy could be seen as an important way to encourage people to use public transport or bicycles instead of cars.</li> <li>• More EV charging points will be needed across the district, in order to encourage people, switch to electric cars.</li> <li>• Car parking standard should consider the subsequent for the on-street parking issue in East Devon.</li> <li>• Provision of electric vehicle charging points duplicates Building Regulations so does not serve a clear purpose. Should delete from policy.</li> </ul>	
Supplementary Regulation 18 consultation Spring 2024	
<ul style="list-style-type: none"> <li>• Not included in this consultation.</li> </ul>	

<b>Sustainability Appraisal</b>	
• See later in this report.	
<b>Habitat Regulations Assessment</b>	
Policy could not have any conceivable effect on a European site – no likely significant effects.	
<b>Commentary on policy redrafting for the Publication Plan</b>	
<ul style="list-style-type: none"><li>• Remove policy wording regarding the EV Charging Points policy, as duplicates the requirements of the Building Regulations 2010 (Part S of Schedule 1).</li><li>• Updated the data from the latest 2021 census data.</li><li>• Adopted the suggestion to follow Local Transport Note 1/20 and adjust the residential cycle parking spaces to 1 space per bedroom.</li></ul>	

Policy 69 – Rear Servicing of Shopping/Commercial Development	
To facilitate the reduction in traffic congestion along main shopping streets it is an aim to improve rear services provision for shopping and commercial areas where opportunities for doing so arise.	
Issues and options consultation	
See General issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• Support policy as it will ensure a much better experience in town centres.</li> <li>• Exmouth Town Council (ETC) support this policy, particularly important for pedestrianised areas such as the Magnolia Centre in Exmouth.</li> <li>• ETC consider that different methods of distribution may be popular in the future such as cargo bikes, rail freight, electric vans so policy should support alternative, environmentally friendly delivery methods.</li> <li>• Agree with policy as it's not fair for delivery vehicles to get parking fines when they are only trying to do their job.</li> <li>• Reasonable ambition but rarely practical.</li> <li>• Do not agree with removing the ability for town centre shops to receive deliveries, particularly with centuries-old streets and layouts.</li> <li>• Need to clarify whether the policy applies to all Class E uses or just shopping and commercial development.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• Support for the policy is noted, but agree with the points that the policy is too restrictive/impractical and that the NPPF and other Local Plan transport policies enables transport impacts to be adequately addressed without this separate, specific policy.</li> </ul>

Supplementary Regulation 18 consultation Spring 2024	
Not included in this consultation.	
Sustainability Appraisal	
See later in this report.	
Habitat Regulations Assessment	
Policy could not have any conceivable effect on a European site – no likely significant effects.	
Commentary on policy redrafting for the Publication Plan	
<ul style="list-style-type: none"> <li>Delete policy as it is too restrictive/impractical and the NPPF and other Local Plan transport policies enables transport impacts to be adequately addressed without this separate, specific policy.</li> </ul>	
Policy 70 – Safe vehicular access to sites	
To ensure safe and effective access to development can be achieved.	
Issues and options consultation	
See General issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>National Highways generally agree with this policy but it should be noted that access affecting the strategic road network are also informed by DfT Circular 01/2022 and must comply with the Design Manual for Roads and Bridges.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>The support for this policy is noted, but the point that it repeats the NPPF 114b is recognised and therefore the policy should be deleted.</li> </ul>

- Sensible policy.
- Support this policy, which should be applied to the proposals at Hawkchurch to build 38 dwellings on a narrow lane.
- Several respondents, including Exmouth Town Council consider that the term “safe access” is subjective – who will determine this? Devon County Council often issue standing advice, refer to statutory guidance, or not comment at all.
- Whilst Highway engineers may like space for two bin lorries to pass, Poundbury shows how access can work without adverse impact on the urban environment.
- Safe access is important but also need to consider how traffic impacts can be reduced.
- Safe access should be considered near schools.
- Add pedestrian and cycle access to the policy to ensure they are given greatest weight.
- The impact of access traffic upon other local road users should also be considered.
- Road widths need to increase as roads are clogged with parked cars, making it difficult for emergency vehicles to pass through.
- Question the need for this policy as it unnecessarily reiterates NPPF para 110b.
- This policy should explicitly include the need to ensure safe access for electric and human-powered vehicles. This is the future that we need to be building.

Supplementary Regulation 18 consultation Spring 2024	
Not included in this consultation.	
Sustainability Appraisal	
See later in this report.	
Habitat Regulations Assessment	
Policy could not have any conceivable effect on a European site – no likely significant effects.	
Commentary on policy redrafting for the Publication Plan	
<ul style="list-style-type: none"> <li>Delete policy as it repeats the NPPF 114b.</li> </ul>	
Policy 71 – Aerodrome Safeguarded Areas and Public Safety Zones	
To ensure development which could compromise aerodromes and public safety are properly considered, including consultation with appropriate bodies.	
Issues and options consultation	
See General issues above.	
Draft Plan consultation	
Key issues raised in consultation: <ul style="list-style-type: none"> <li>Exeter and Devon Airport Ltd (EDAL) support this policy and will support the Council to ensure it is fully and consistently applied.</li> </ul>	Officer commentary in response: <ul style="list-style-type: none"> <li>Support noted.</li> <li>Agree with the need to add reference to suitable mitigation.</li> </ul>

<ul style="list-style-type: none"> <li>• EDAL consider the policy should be amended to state development which would impact on the operation of safety or navigational systems at the Airport must provide suitable mitigation, for example funding for system upgrades.</li> <li>• This policy is used by the airport and developers to limit the delivery of solar PV panels, which is too restrictive as there are very few flights, warehouses are planned on the edge of the Airport, and the runway is culverted at Clyst Honiton.</li> <li>• Good to protect minor airports such as Dunkeswell which still provide lots of low-level infrastructure.</li> <li>• Exeter Airport should be closed and redeveloped as housing – an airport should not be included in a carbon neutral plan.</li> <li>• Welcome policy 71 on aerodrome safeguarding but need to consider safeguarding of Exeter Airport in all allocations, including for the proposed new town.</li> <li>• Clyst Honiton Parish Council has expressed concerns about this policy.</li> </ul>	
Supplementary Regulation 18 consultation Spring 2024	
Not included in this consultation.	
Sustainability Appraisal	
See later in this report.	
Habitat Regulations Assessment	

<p>Policy could not have any conceivable effect on a European site – no likely significant effects.</p>	
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<p><b>Commentary on policy redrafting for the Publication Plan</b></p>	
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| <ul style="list-style-type: none"> <li>• Amend policy to state that development which would impact on the operation of safety or navigational systems at the Airport must provide suitable mitigation.</li> <li>• Simplify policy.</li> </ul> |  |
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<p><b>Strategic Policy 72 – Digital Connectivity</b></p>	
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<p>To ensure development will have access to have access to superfast broadband and high-quality communications, and support the expansion of full-fibre broadband connections in the district.</p>	
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<p><b>Issues and options consultation</b></p>	
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<p>See General issues above.</p>	
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<p><b>Draft Plan consultation</b></p>	
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<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• National Farmers Union state Rural areas continue to suffer with a lack of connectivity (broadband and mobile), in the modern age this is a real barrier to business, resulting in a drag on efficiency. We welcome the recognition of the need for connectivity, but importantly this is not just for new development, there are large parts of the district which do not have an acceptable service so provision of new infrastructure to cover these ‘not-spots’ should be encouraged.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• Supports and concern noted.</li> <li>• Although there are concerns about the availability of superfast broadband across East Devon, Ofcom statistics show that 92.53% of addresses had superfast broadband coverage in 2024. To promote wider adoption and address the evolving requirements of building regulations, the superfast broadband policy is deemed reasonable.</li> </ul>
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<ul style="list-style-type: none"> <li>• Need flexibility for scenarios where ‘superfast broadband’ may not be feasible, for example in rural communities.</li> <li>• The provision of ‘sufficient mobile connectivity’ is subject to service provision beyond the control of a developer and should be omitted from the policy.</li> <li>• Exmouth Town Council Members support the policy but stressed the need for community resilience in respect of possible over-reliance on electronic communications.</li> <li>• General support received for this policy, and numbers of comments pointed out the need of improvement on digital connectivity across East Devon.</li> <li>• Policy should also cover the existing housing.</li> <li>• Barratt David Wilson Homes - Policy requirement for new development to provide access to superfast broadband and high-quality communication duplicates the changed Building Regulations (changes came into effect 26 December 2022). This part of the policy does not serve a clear purpose – should be deleted.</li> </ul>	
<b>Supplementary Regulation 18 consultation Spring 2024</b>	
Not included in this consultation.	
<b>Sustainability Appraisal</b>	
See later in this report.	
<b>Habitat Regulations Assessment</b>	
Policy could not have any conceivable effect on a European site – no likely significant effects.	

Commentary on policy redrafting for the Publication Plan	
Updated data regarding East Devon broadband coverage and the latest building regulation standard.	

<b>Policy 73 – Wireless connectivity and telecoms infrastructure</b>	
The policy seeks to ensure that wireless and telecoms infrastructure is developed in a way that balances the need for connectivity with the potential impact on the environment and local communities.	
<b>Issues and options consultation</b>	
See General issues above.	
<b>Draft Plan consultation</b>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• Exmouth Town Council members support this policy.</li> <li>• Private fixed broadband networks on new housing estates can limit residents' choices</li> <li>• EDDC should pause 5G rollout due to health concerns, more research needed.</li> <li>• Programme of extension of wireless connectivity and telecoms should consult local residents in advance.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• Support noted</li> <li>• Health concern noted</li> </ul>
<b>Supplementary Regulation 18 consultation Spring 2024</b>	
Not included in this consultation.	
<b>Sustainability Appraisal</b>	
See later in this report.	
<b>Habitat Regulations Assessment</b>	
Policy could not have any conceivable effect on a European site – no likely significant effects.	

Commentary on policy redrafting for the Publication Plan
No change on the policy.

<b>Policy omissions from Chapter 11</b>	
This section considers any policy omissions from Chapter 11.	
<b>Issues and options consultation</b>	
See General issues above.	
<b>Draft Plan consultation</b>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• The Local Plan would be improved with the addition of a planning policy which mandates that active travel infrastructure and public transport is in place and roads are adopted by DCC before houses are occupied so that bad driving/parking habits do not develop.</li> <li>• Work Hubs: The Devon Climate Emergency Response Groups 'Carbon Plan' referred to 'work hubs' as one means of reducing the need to travel. The Local Plan should align with this and commit to work hubs as one means of decarbonising transport.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• It would be too prescriptive to require active travel infrastructure and public transport is in place and roads are adopted by DCC before houses are occupied.</li> <li>• Employment policies support jobs and the economy.</li> </ul>
<b>Supplementary Regulation 18 consultation Spring 2024</b>	
Not included in this consultation.	
<b>Sustainability Appraisal</b>	
See later in this report.	
<b>Habitat Regulations Assessment</b>	
Not relevant.	

Commentary on policy redrafting for the Publication Plan
<ul style="list-style-type: none"> <li>No omissions that require an additional policy.</li> </ul>

Sustainability Appraisal
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<p>Policy number/title:</p> <ul style="list-style-type: none"> <li>65. Strategic Policy – Walking, cycling, and public transport</li> <li>66. Policy – Protecting transport sites and routes</li> <li>67. Policy – Travel Plans, Transport Statements, Transport Assessments</li> <li>68. Policy – Parking standards</li> <li>69. Policy – Rear servicing of shopping/commercial development</li> <li>70. Policy – Safe vehicular access to sites</li> <li>71. Policy – Aerodrome safeguarded areas and public safety zones</li> <li>72. Strategic Policy – Digital connectivity</li> <li>73. Policy – Wireless connectivity and telecoms infrastructure</li> </ul>
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<p>Outcome of sustainability appraisal:  <b>Preferred alternative:</b> Policies 65 – 73</p> <p><b>Reasons for alternatives being preferred or rejected:</b></p> <ul style="list-style-type: none"> <li>The preferred policies 65 – 73 are likely to have major positive effects minimising carbon emissions, health and well-being, access to services, jobs and employment, and connectivity and transport. Minor positive effects are noted for several other objectives. There a few negative uncertain effects, which can be mitigated to reduce their impact.</li> <li>65A. Specify walking distances to local facilities from new housing – whilst this alternative is likely to have positive effects on minimising</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>It is noted that SA work provides positive policy feedback.</li> </ul>
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carbon emissions from travel (objective 4), access to services (10), and connectivity (13), these effects are uncertain as there are other factors to consider such as topography, surveillance, directness, attractiveness of the environment, and the intended destination. Therefore, this alternative is rejected.

- 65B. Set mode share targets for different travel modes from new development – this approach could have positive effects on minimising carbon emissions from travel (objective 4), access to services (10), and connectivity (13), but these effects are uncertain as such standards are difficult to justify and challenging to enforce once development is occupied. Therefore, this alternative is rejected.
- 66A. Do not protect transport sites and routes – this alternative is rejected as it reduces the potential to deliver transport routes and sites to widen transport choice and deliver large-scale new development, and would therefore have fewer positive effects on minimising carbon emissions from travel (objective 4), access to services (10), and connectivity (13).
- 67A. Do not include a policy on Travel Plans, Transport Statements, Transport Assessments – this is rejected as it would cause uncertainty as to when Travel Plans, Transport Statements, Transport Assessments would be required, so performs less positively on minimising carbon emissions from travel (objective 4), access to services (10), and connectivity (13).
- 68A. Do not set parking standards – this is rejected as it would cause uncertainty on parking standards in new development, so performs less positively on minimising carbon emissions from travel (objective 4), access to services (10), and connectivity (13).
- 72A. Do not include a policy on digital connectivity – this would likely mean uncertain effects for objective 13 due to a risk of inadequate provision being made that is not future-proofed, and installations not providing consumer choice because the lack of conducting for other

providers which is then costly to install after the event. Therefore, this alternative is rejected.	
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## **10 Conclusions**

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