

Filtered Data Export

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal: 11. Sustainable Transport and Communications

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: TR04

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.: DCC welcomes the additional wording inserted in relation to electric vehicle charging provision, which (in addition to policies promoting active travel, public transport and improvements to digital connectivity) should help ensure development supports the decarbonisation of transport, in line with the Devon Carbon Plan and Devon Electric Vehicle Charging Strategy.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal: 11. Sustainable Transport and Communications

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

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

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal: 12. Our Outstanding Landscape

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: To ensure that Policy OL07 remains up to date, DCC requests that the policy wording is amended to state: "Development on or in close proximity to active, permitted or former waste management sites will only be permitted where it can be demonstrated that there will be no harm to future occupiers of the site from leachate or landfill gas or other waste arising in consultation with Devon County Council as the waste planning authority and in accordance with Policy W10 (Protection of Waste Management Capacity) of the Devon Waste Plan, or equivalent policy within a subsequent or amended plan".

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal: 12. Our Outstanding Landscape

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL02

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: It is suggested that point A where it states “but affecting its setting or appearance” is amended to read “but affecting its natural beauty, special qualities and key characteristics”. It is considered that using this terminology allows linkage to the National Landscape Management Plans and associated Landscape Character Assessments.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal: 12. Our Outstanding Landscape

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 12.5

1(b). Does your comment relate to one of the changes listed above?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: DCC suggests amending the wording of paragraph 12.5 to align with Guidelines for Landscape Visual Impact Assessment 3rd Edition as follows: "Proposals that raise concerns about adverse effects on the character of an area and/or visual amenity should be subject to a proportionate Landscape and Visual Appraisal, conducted in accordance with the Guidelines for Landscape and Visual Impact Assessment and related technical guidance published by the Landscape Institute. The level of detail required will depend upon the scale and type of development proposed, the sensitivity of the landscape to such change, and the likely significance of effects. If a full Environmental Impact Assessment (EIA) is required, a Landscape and Visual Impact Assessment (LVIA) by a Chartered Member of the Landscape Institute will be necessary. Both types of appraisals should be objective and unbiased assessments that identify and assess the effects of a proposal on the landscape and visual resource and include measures to mitigate adverse effects. Carrying out such appraisals early in the design process is encouraged in order to inform a high standard of mitigation and enhancement design".

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal: 12. Our Outstanding Landscape

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 12.3

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph.

Please be as precise as possible.: DCC has two layers of data that comprise the shared Devon-wide evidence base called Devon's Landscape Character Assessment. It comprises generic Landscape Character Types that can occur anywhere in Devon, and 'Devon Character Areas' that are geographically unique and highlight what is distinctive and gives a 'sense of place' to a particular area. The 'district Landscape Characterisation Assessment' referred to in paragraph 12.3 covers only Landscape Character Types. To allow both layers to be used as evidence base for the local plan it is suggested that paragraph 12.3 refers to both Landscape Character Types and Devon Character Areas, and that a link is embedded to the DCC landscape webpage. Again, DCC suggests the word "Characterisation" is changed to "Character". To reflect these changes, DCC suggests the following amended wording for the last sentence of paragraph 12.3: "All development in the countryside should consider the Devon Landscape Character Assessment (footnote to be inserted) and district Landscape Character Assessment (LCA) and the Council's Tree Strategy to maintain and enhance local distinctiveness and landscape character." Footnote to be inserted: Devon's landscape character assessment (DLCA) - Planning

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB04

1(b). Does your comment relate to one of the changes listed above?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Additionally, it is unclear that speed reductions would have a significant beneficial impact on emissions, given that existing average vehicular speeds are (according to DCC data) close to optimum in relation to cruise emissions. Furthermore, it is noted that the abovementioned long-listed options were not included in the subsequent short list of mitigation options detailed in Mitigation of Air Quality Impacts in East Devon: Mitigation Strategy (Ricardo AEA Ltd, 6 November 2025): Ricardo report template. It is therefore recommended that the local plan text is updated to match the Ricardo report short list, with a further minor change to reflect that EVs do not generate exhaust emissions (but the generation of electricity to power EVs may generate emissions, and EVs produce particulate matter from tyres and brakes): “An initial overarching mitigation strategy has been produced and this is to be followed by a more detailed Pebblebed Heaths Air Quality Mitigation Strategy. The detailed mitigation strategy will establish a strategic approach to ensuring mitigation delivery. This strategy will include costed projects and schemes that can be demonstrated to be deliverable. Such projects will ensure that the local plan can be implemented and that individual planning applications can meet Habitat Regulation requirements and proceed on the basis of drawing on planned mitigation and capacity and timing for delivery as set out in this strategy. A ‘short list’ of potential mitigation options will be refined and costed and where appropriate included in the detailed strategy, to potentially include:

-Electric Vehicle infrastructure

-Slurry stores

-Replacing refuse collection vehicles (RCVs) with electric vehicles (EVs)

-Replacing dog waste vehicles with EVs

-Land management

-Local Plan Air Quality Development policy Monies, drawn from developer contributions, will secure mitigation delivery. A key element of mitigation will be proactively seeking an accelerated rate of uptake of electric vehicles, specifically amongst those moving into new homes to be built under local plan policy. Electric vehicles do not generate exhaust emissions and as such greater levels of use with a corresponding decrease in internal combustion engine vehicles will diminish over time the need for other mitigation.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB04

1(b). Does your comment relate to one of the changes listed above?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: In principle, DCC is supportive of measures to reduce the impacts of traffic on designated sites, including through promoting the uptake of electric vehicles and enabling modal shift from cars to active travel and public transport. However, DCC does not consider the following measures included in the 'long-list' of potential mitigation options on page 256 for the Pebblebed Heaths to be feasible:

- Traffic re-direction away from the Pebblebed Heaths and sensitive locations
- Low Emission Zones and Ultra Low Emission Zones
- Providing additional road signage This is due to the lack of suitable alternative routes to the main roads through the Pebblebed Heaths (specifically the A3052, B3179 and B3180), meaning that traffic re-direction/providing additional road signage is unlikely to be appropriate, and meaning that Low Emission Zones and Ultra Low Emission Zones would likely have a disproportionate adverse impact on road users, particularly those in lower income groups.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal: 15. Our Outstanding Historic Environment

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HE05

1(b). Does your comment relate to one of the changes listed above?: Yes

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Historic Environment chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Historic Environment chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The county council requests that the paragraph proposed to be removed in this policy is retained. Historic Landscapes, Parks and Gardens are heritage assets and those on the register should be considered as designated heritage assets.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP08

1(b). Does your comment relate to one of the changes listed in the table above?: Yes

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

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: DCC welcomes the inclusion of additional wording to specify that transport infrastructure within development parcels should align with infrastructure on neighbouring parcels/sites, to ensure there are continuous and attractive active travel and vehicular links from development sites to neighbouring areas and key destinations.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

3. The Spatial Strategy

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

Paragraph

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

3.45

1(b). Does your comment relate to one of the changes listed in the table above?: Yes

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

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: DCC welcomes the inclusion of this additional wording to highlight the critical nature of additional education infrastructure to support new housing development.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

3. The Spatial Strategy

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

Paragraph

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

3.44b

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: DCC welcomes this new supporting statement paragraph. DCC has a strong preference that county-related infrastructure is funded through Section 106 agreements as this provides greater certainty that sufficient funding is available for delivery of the necessary infrastructure at the appropriate time. This is particularly important for the provision of education and transport infrastructure. The Devon and Torbay Combined County Authority (DTCCA) will take on the role of Local Transport Authority from 1 April 2026, but DCC will continue to be the Local Highway Authority, meaning EDDC may need to work with both the DTCCA and DCC in relation to infrastructure requirements for new development.

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:

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3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: DCC therefore requests that a minor revision be made to the first sentence of paragraph 3.44b to state: "The Council will work with relevant infrastructure and service providers, including education, health, police, highway and transport authorities, to ensure timely and effective delivery of infrastructure." DCC also requests that additional wording to include mention of transport and highways is added to the last sentence of paragraph 3.44b to state, "Where appropriate, planning obligations

(s106) will be used to secure the provision and ongoing maintenance of infrastructure, particularly for education, transport, highways and health facilities.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

3. The Spatial Strategy

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

Paragraph

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

3.44

1(b). Does your comment relate to one of the changes listed in the table above?: Yes

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: This paragraph includes some duplicated wording.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This should be amended for clarity to the following wording:

“Additional homes create the need for additional education provision including for early years and childcare, primary, secondary, post 16 and pupils with special educational needs and disabilities. There are also implications for home to school transport. This education impact of development must be fully mitigated by financial contributions in order for development to be acceptable in planning terms.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

3. The Spatial Strategy

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

Paragraph

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

3.43b

1(b). Does your comment relate to one of the changes listed in the table above?: Yes

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

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: DCC welcomes the recognition that a significant amount of transport infrastructure will be required alongside housing and employment growth, and that development will be expected to contribute to the delivery of said infrastructure. DCC will continue to work with the district council to ensure development proposals incorporate and/or make appropriate contributions to the delivery of local and strategic transport infrastructure enhancements.

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:

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Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

3. The Spatial Strategy

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

Policy

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

1(b). Does your comment relate to one of the changes listed in the table above?: No

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

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: DCC supports Strategic Policy SP07. However, the county council wishes to make some detailed comments on the November 2025 version of the Infrastructure Delivery Plan (IDP). These comments which include requested changes to the wording of the IDP are shown below in the table in Appendix 2 of this letter. DCC will continue to work with the district council to make any further changes identified as necessary to the IDP for example to refine costing information in the light of new evidence.

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: DCC supports Strategic Policy SP07. However, the county council wishes to make some detailed comments on the November 2025 version of the Infrastructure Delivery Plan (IDP). These comments which include requested changes to the wording of the IDP are shown below in the table in Appendix 2 of this letter. DCC will continue to work with the district council to make any further changes identified as necessary to the IDP for example to refine costing information in the light of new evidence.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::
Lymp_07

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a coordinated and comprehensive approach, DCC recommends that the Exmo_23 and Lymp_07 allocations could be covered by a single section (similar to the approach for Exmo_08 and Exmo_16), reading as follows: “The land south of Courtlands Lane (within the Exmo_23 allocation) will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes. The site at Courtlands Cross north of Courtlands Lane (within the Lymp_07 allocation) will accommodate around 100 new homes and 0.4 hectares of employment land. The field to the west of the housing allocation land is allocated for delivery of sports pitch uses and associated low key ancillary facilities as part of a viable package of planning obligations. Built development at this site, located on the two south-easterly fields, will need to be particularly sensitively designed to avoid potential for adverse impact on nearby heritage assets and to avoid adverse landscape impacts. These allocations will need to come forward on the basis of an agreed coordinated access strategy for both Exmo_23 and Lymp_07 allocations that clearly demonstrates how sustainable transport will be designed and implemented. Particular importance is attached to retention of the East Devon Way footpath, in a spacious corridor, across the Lymp_07 site in a north-south direction. There should also be safe off-street pedestrian and cycle access that provides for east-

west movement through the area for existing and future users linking into adjacent areas such as Lympstone Manor. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Through this coordinated access strategy, particular account will need to be taken of providing active travel links to the wider network and towards the town centre with alterations to vehicular access along Courtlands Lane.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Exmo_23

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a coordinated and comprehensive approach, DCC recommends that the Exmo_23 and Lymp_07 allocations could be covered by a single section (similar to the approach for Exmo_08 and Exmo_16), reading as follows: “The land south of Courtlands Lane (within the Exmo_23 allocation) will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes. The site at Courtlands Cross north of Courtlands Lane (within the Lymp_07 allocation) will accommodate around 100 new homes and 0.4 hectares of employment land. The field to the west of the housing allocation land is allocated for delivery of sports pitch uses and associated low key ancillary facilities as part of a viable package of planning obligations. Built development at this site, located on the two south-easterly fields, will need to be particularly sensitively designed to avoid potential for adverse impact on nearby heritage assets and to avoid adverse landscape impacts. These allocations will need to come forward on the basis of an agreed coordinated access strategy for both Exmo_23 and Lymp_07 allocations that clearly demonstrates how sustainable transport will be designed and implemented. Particular importance is attached to retention of the East Devon Way footpath, in a spacious corridor, across the Lymp_07 site in a north-south direction. There should also be safe off-street pedestrian and cycle access that provides for east-

west movement through the area for existing and future users linking into adjacent areas such as Lympstone Manor. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Through this coordinated access strategy, particular account will need to be taken of providing active travel links to the wider network and towards the town centre with alterations to vehicular access along Courtlands Lane.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Exmo_23

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a coordinated and comprehensive approach, DCC recommends that the Exmo_23 and Lymp_07 allocations could be covered by a single section (similar to the approach for Exmo_08 and Exmo_16), reading as follows: “The land south of Courtlands Lane (within the Exmo_23 allocation) will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

4. Development at the West End

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Clge_25a

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

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

The county council removes its objection to the allocation of Clge_25a as further archaeological work has been undertaken. DCC would advise that any impact upon any heritage assets with archaeological interest can be mitigated by a programme of archaeological work secured either (i) by the submission of a written scheme of investigation submitted in support of any future planning application or (ii) by the application of the two usual archaeological conditions to any consent that may be granted. The County Historic Environment Team can provide detailed advice on the scope of the programme of works.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

4. Development at the West End

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

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

4.45b

1(b). Does your comment relate to one of the changes listed above?: Yes

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

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

DCC welcomes the reference to the Clyst Road and Newcourt Road Transportation Access Strategy, and will work with the district council to help ensure development proposals are aligned with this strategy.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

4. Development at the West End

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

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

4.34b

1(b). Does your comment relate to one of the changes listed above?: Yes

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: DCC requests that reference to “not fluvial risk” should be removed from the end of the paragraph wording as there is an ordinary watercourse and this, while mapped as a surface water risk, technically poses a fluvial risk.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

4. Development at the West End

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

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

4.8e

1(b). Does your comment relate to one of the changes listed above?: Yes

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

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

DCC welcomes the new wording in paragraph 4.8e which provides clarification of the purpose of the Waste Consultation Zone at Hill Barton.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

4. Development at the West End

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

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

4.8b - 4.8d

1(b). Does your comment relate to one of the changes listed above?: Yes

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

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

DCC welcomes the focus on active travel and public transport enhancements within the Marcombe Transport Vision, and will continue working with the district council and National Highways to develop proposals for active travel links, bus service and infrastructure enhancements and improvements to key junctions on the local and strategic road networks.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

4. Development at the West End

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::
Marlcombe

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

DCC welcomes the provision of 15 permanent pitches at Marlcombe within the plan period and the proposed provision of a further 15 pitches beyond 2042. DCC supports the requirement for s106 obligations to secure the delivery of physical infrastructure and revenue contributions towards the delivery of services to support the growth of the community and the health and wellbeing of its residents. DCC welcomes that Education is now identified in its own section within Policy WS01 as the provision of school places is a statutory requirement. The wording states that new education facilities at Marlcombe will meet the needs of all age groups that will live in the town. Please note that, whilst the SEND provision is of an appropriate size and scale to development, pupils will attend from a wider area due to the specific nature of the provision. Similarly, pupils with SEND living in Marlcombe may be required to travel to access the appropriate education facility to meet their specific needs. DCC supports the increase in land for education infrastructure and this is sufficient to support development on land allocated in the local plan for 8,000 homes based on the current Department for Education Building Bulletin 103 and Building Bulletin 104 site area guidance. DCC also welcomes the emphasis on the importance of timely delivery of education infrastructure at Marlcombe. DCC welcomes the inclusion of transport infrastructure in the list of wider infrastructure which will need to come forward with development proposals at Marlcombe. It should be noted that Devon County Council cannot commit to forward fund the infrastructure requirements of the second new community during the plan period. DCC notes that development proposals will be

expected to contribute towards infrastructure on a pooled basis. At this stage it is unclear what form the pooling mechanism would take as part of the intended approach to achieve an overall fair and consistent apportionment of infrastructure costs. Any pooling mechanism will need to ensure that sufficient funding will be guaranteed for statutory and/or essential infrastructure and provided to DCC in a timely manner to ensure the delivery of this infrastructure to mitigate the impacts of development and support the new community. It may be appropriate for some infrastructure such as education and transport not to be included in a pooling mechanism, beyond that which DCC may use to combine contributions from multiple planning applications/developers. DCC welcomes the provision for a review mechanism for planning obligations. This will ensure that the full cost of infrastructure is secured, which will support delivery of infrastructure throughout the development of Marlcombe. DCC welcomes the new Waste Consultation Zone section in Policy WS01 which makes reference to the Hill Barton Waste Consultation Zone. The wording of this new section has been discussed and agreed with DCC. It is considered that the new wording supports Policy W10 of the Devon Waste Plan and the protection of waste management capacity at Hill Barton.

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

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3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Related to this, DCC requests the final line of the education section in Policy WS01 is amended to include mention of the need for a forward funding solution as this underpins timely delivery as follows: “The precise timing and mechanism for the forward funding and delivery of the schools is to be established through the phasing and infrastructure delivery strategies.” DCC requests that Wider Infrastructure item B is deleted as this requirement is included above in the Education Facilities section on page 55.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

4. Development at the West End

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::
Marlcombe

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

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

DCC welcomes the requirement to provide a 70 unit Extra Care Housing scheme, C2 residential care home and specialist housing to support younger vulnerable people in the community.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD26

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::
Sidm_34

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

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

DCC welcomes the greater clarity provided by the revised wording relating to delivery of the Sidbury to Sidford/Sidmouth cycle route within the Sidm_34 allocation.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Feni_05, Feni_08

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To clarify requirements, DCC requests that an additional paragraph be added to the text relating to the Feni_05 and Feni_08 allocations as follows: "The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes."

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: No

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

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure a coordinated approach, DCC requests that an additional paragraph be added to the text relating to this policy as follows: "Development will need to come forward on the basis of an agreed coordinated access strategy for both allocations at Exton that maximises the opportunities and minimises the potential adverse impacts of development in relation to transport."

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::
Coly_06a

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

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

DCC welcomes the greater clarity provided by the revised wording relating to footway improvements along the frontage of the Coly_06a allocation.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: No

1(c). If the comment is related to a site, please state the site reference here::

Seat_13a

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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

Devon County Council maintains its objection to allocation Seat_13a due to insufficient information on the presence and significance of any heritage assets with archaeological interest associated with the nationally important and scheduled monument adjacent and to the south.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy SD04 should reflect the need for additional primary and improved secondary education provision in Ottery St Mary and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan. DCC requests that the following wording is added to Policy SD04: "In addition to the new primary school with provision for early years for Ottery St Mary, improved secondary school facilities are required to support further development in Ottery St Mary and the wider aspirations of the plan."

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy SD03 should reflect the need for improved secondary education facilities in Honiton and recognise this as a requirement to support the policy and wider aspirations of the plan. DCC requests that the following wording is added to Policy SD03: “Improved secondary school facilities in Honiton are required to support further development in Honiton and the wider aspirations of the plan.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Axmi_09

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

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The county council maintains its objection to Axmi_09 as archaeological work is still ongoing and it is advised this site should not be allocated until the results of the archaeological investigations are available for consideration by the County Historic Environment Team.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Axmi_08

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

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

The county council removes its objection to allocations Axmi_02 and Axmi_08 subject to archaeological work and design/layout approval that does not/minimises the effect upon the setting of the scheduled monument.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Axmi_02

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

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

The county council removes its objection to allocations Axmi_02 and Axmi_08 subject to archaeological work and design/layout approval that does not/minimises the effect upon the setting of the scheduled monument.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Axmi_01a

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

DCC notes the removal of allocation Axmi_01a.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Axmi_09

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: DCC also recommends the correction of minor typographical errors within the policy text relating to the Axmi_02, Axmi_08 and Axmi_09 allocations: “The site is located close to the Strategic Road Network (SRN) and development should avoid adverse impacts on road safety on the SRN.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Axmi_08

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: DCC also recommends the correction of minor typographical errors within the policy text relating to the Axmi_02, Axmi_08 and Axmi_09 allocations: “The site is located close to the Strategic Road Network (SRN) and development should avoid adverse impacts on road safety on the SRN.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Axmi_02

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: DCC also recommends the correction of minor typographical errors within the policy text relating to the Axmi_02, Axmi_08 and Axmi_09 allocations: “The site is located close to the Strategic Road Network (SRN) and development should avoid adverse impacts on road safety on the SRN.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Axmi_22

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure the possible future relief road is protected from development, DCC requests that the policy text relating to the Axmi_22 allocation be amended to read: "This site is allocated for 100 dwellings. The site layout should make provision for a suitable access road to facilitate the development of site GH/ED/80 to the north and also be designed and built to a standard suitable for use and include land safeguarded at the Lyme Road intersection as part of a possible future relief road to link to the A358, Chard Road, south of the Weycroft Bridge. Pedestrian/cycle access should be off Loup Court, with Public Rights of Way enhancements."

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy SD02 should identify the need for additional primary and secondary education infrastructure in Axminster and recognise this as a requirement to support the policy with the latter also supporting the wider aspirations of the plan. DCC requests that the following wording is added to Policy SD02: "Expanded primary and secondary school provision in Axminster is required to support further development in Axminster and the wider aspirations of the plan."

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Exmo_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: DCC largely welcomes the reference to the Mineral Safeguarding Area and Mineral Consultation Area in the Exmo_20 wording and removes its objection to the allocation. DCC requests that the wording and formatting of the following paragraph is amended (contained at the bottom of page 86) to include a bullet point list and minor wording change to clearly demonstrate the tests that need to be met in order to allow for development should a Mineral Resource Assessment show that the mineral resource is of value. DCC requests the paragraph is amended to read: “Planning permission for development or use of the land (including for open space and recreational uses) in the Mineral Safeguarding Area will not be permitted unless the development demonstrates through a robust Mineral Resource Assessment, that the mineral resource is not of current or potential economic value. Should a Mineral Resource Assessment show that the mineral resource is of current or potential economic value, the development must demonstrate:

- prior extraction of the mineral resource in advance of development will be undertaken;
- or

- it is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction or operation within the timescale that the mineral resource is likely to be needed.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Exmo_20

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It is noted that the policy wording for Exmo_20 now states the need for a detailed heritage assessment to be submitted as part of a planning application. DCC considers that the proposed allocation occupies a large area within a landscape where minimal formal archaeological work has been undertaken and contains evidence of prehistoric activity in the form of findspots of flint tools and funerary monuments on the higher ground to the north. In addition, this proposed allocation area lies in proximity to the church of St John- in-the-Wilderness, originally the 15th century parish church and protected as a grade II* listed building. Given the archaeological potential of the proposed development site, DCC requests that any proposals for development should be informed and supported by an appropriate level of heritage information. This should take the form of the results of a geophysical survey and field evaluation of the areas affected by the proposed development. To make the need for archaeological assessment clear, and align with the requirements set out in other site allocation policies, DCC requests the policy wording is amended to include “A detailed heritage and archaeological assessment...”.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Exmo_17

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: DCC recommends the correction of a minor typographical error within the policy text relating to the Exmo_17 allocation as follows: "The development will need to be supported by a new developer provided SANGs, brought forward and implemented as part of the overall scheme on the allocated or on nearby land." DCC recommends a further minor change to include Castle Lane in the list of locations to be served by pedestrian and cycle connections from the Exmo_17 allocation as follows: "The cycle path bisecting the site will need to be retained and enhanced within an attractive corridor with pedestrian and cycle access routes provided throughout the development. New circular pedestrian and cycle routes should be provided within the site, together with connections to the wider network, including Castle Lane, the South West Coast Path and to local services in Littleham and to the Liverton Business Park."

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Exmo_18

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: DCC also recommends that the policy text relating to the Exmo_18 allocation should identify the need for active travel and bus enhancements in the event of a secondary access being provided from Salterton Road, and the need for the design of this access to give consideration to potential changes associated with the Exmo_17 allocation opposite, with amended wording as follows: “Any secondary access from Salterton Road should be carefully designed and screened to minimise any impacts on the setting of the National Landscape. In the event of such an access being provided, development should also provide an extension of the existing shared-use path on the northern side of Salterton Road (to the junction with the secondary access), and new/improved bus stops on Salterton Road. Any secondary access should be designed giving consideration to potential changes to road layouts associated with the Exmo_17 allocation on the opposite side of Salterton Road. Existing hedges to the southern and eastern site boundaries should be reinforced and appropriately managed and additional trees planted.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::

Exmo_04a

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Comments relating to Lymp_14 and Exmo_04a: DCC also recommends that the policy text relating to the Lymp_14 and Exm_04a allocations should identify the need for localised improvements to enhance sustainable travel modes with wording as follows:

Land at Marley Drive (Exmo_04a) This site is allocated for around 50 new homes. The site supports a number of significant mature trees with areas of biodiversity value within the site and to its boundaries which will demand particular sensitivity in respect of site design and implementation to avoid damage and delivery of onsite habitats should reflect and link into adjoining priority habitats. There will need to be pedestrian and cycle access through this site into Site Lymp_14 and thereafter on into Goodmores Farm. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.”

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

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

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

1(c). If the comment is related to a site, please state the site reference here::
Lymp_14

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: DCC also recommends that the policy text relating to the Lymp_14 and Exm_04a allocations should identify the need for localised improvements to enhance sustainable travel modes with wording as follows: "Land at Coles Field Hulham Road (Lymp_14) This site is allocated for around 59 new homes. Biodiversity interest at and close to this site will demand particular sensitivity in respect of site design and implementation to avoid damage and delivery of onsite habitats should reflect and link into adjoining priority habitats. This site will need to provide pedestrian and cycle access into the adjoining site Exmo_04a. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

7. Adapting to Climate Change

1. To which part of the Adapting to Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: AR01

1(b). Does your comment relate to one of the changes listed above?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.: DCC supports the proposed policy wording changes to point F.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN09

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: It is noted that the plan is supported by a needs assessment setting out a requirement for 32 pitches between 2023 and 2045, of which 29 pitches are required during the local plan period. Devon County Council accepts the reasoning for this reduction in local plan need to reflect a shorter time period for delivery. DCC welcomes proposals within the local plan for the allocation and delivery of a total of 30 permanent pitches within the plan period (within Marlcombe and the Cranbrook expansion areas). DCC considers the proposals set out in the plan regarding gypsy and traveller provision to be sufficient based on the assessment as published, with provision in appropriate locations near to local services and transport options. The delivery of the 30 pitches at Cranbrook and Marlcombe is considered to be achievable in principle, and therefore, the county council has no objection regarding gypsy and traveller provision. Should a review of the needs assessment be required, the county council would expect provision to be made in the plan for the full assessed need.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

1(b). Does your comment relate to one of the changes listed above?: Yes

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: DCC notes that the M4(2) requirements have decreased from 100% to 50% due to a reduction of need identified in the updated Housing Needs Assessment (dated October 2025). The county council notes the Building Regulation consultation 2022 that indicated the Government is likely to mandate M4(2) as a minimum for all new homes. Therefore, it is considered that changes to the M4(2) requirements will be progressed under the Building Regulations.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: DCC supports the removal of “affordable” in the first paragraph given inclusion of a requirement for specialist housing for older people to provide affordable housing in Policy HN02.