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Angela King
East Devon District Council
Blackdown House
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

7th March 2025

Dear Ms King,

**Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Development Plan Regulation 16
Submission Version Consultation
Representations on Behalf of CR Down Farming Ltd. and Stuart Partners Ltd.**

Introduction

CarneySweeney is instructed to make written representations on behalf of CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, which is being actively promoted as a strategic allocation for new homes and associated uses.

CarneySweeney submits the following representations to East Devon District Councils' current consultation on the Submission Version of the Neighbourhood Plan for the Parish areas of Clyst St Mary and Sowton. The Consultation closes at 9am on Monday 17th March 2025.

These representations are made in the context of an EIA scoping opinion request (EDDC ref: 24/0002/EIA) and pre-application request submitted to East Devon District Council (EDDC) in respect of proposed strategic development on land south of A3052 and east of A376. Both documents have been attached at Appendix 1 & 2.

Representations have been made previously to Bishops Clyst Parish Council's Neighbourhood Plan Pre-Submission Consultation (Regulation 14 Version) undertaken in June 2024, of which has been attached at Appendix 3. Very little amendments have been made to the Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Plan since our last representations have been made, which warrant additional comments. Therefore, our main commentary included within our previous representations to Bishops Clyst Parish Council, still applies and should be referred to in the instance of this consultation.



Our clients:

- Are actively promoting land south of A3052 and east of A376, Clyst St Mary as a strategic development allocation through the draft East Devon Local Plan, with an intention to submit an outline planning application in due course.
- Appreciate the concerns of the Parish which relate to the existing sewage system, flood defences, highway capacity, pedestrian safety and the inadequacies of the footpath and cycle network, parking spaces, community facilities, health services and pupil places at the Primary School, and are committed to working collaboratively with the Parish Council and EDDC to address these issues as part of the strategic development.
- Supports the objectives of Policy BisC16 (Business Development), which seeks to support the need for employment land within the area.
- Support the principles outlined in Policy BisC09 (Sustainable Development) and Policy BisC18 (Footpaths and Cycleways) which emphasises the importance of sustainable development and the creation of safe, accessible pedestrian and cycle links to provide a connected safe network in and around the neighbourhood plan area.
- Support the introduction of a Design Code for the Clyst St Mary and Sowton area.

Conclusions

These representations are submitted to East Devon District Council by CarneySweeney on behalf of our clients, CR Down Farming Ltd and Stuart Partners Ltd to promote land south of A3052 and east of A376, Clyst St Mary, which is being actively promoted as a strategic allocation for new homes and associated uses.

Representations were previously made to Bishops Clyst Parish Council's Neighbourhood Plan Pre-Submission (Regulation 14 Version) Consultation in respect of our client's land, which should be referred to in the instance of this consultation undertaken by EDDC.

We ask to be kept informed of next stages of consultation. In the meantime, should you have any queries please do not hesitate to contact us.

Yours faithfully



Simon Coles

Director – Planning

CarneySweeney

cc. CR Down Farming Ltd and Stuart Partners Ltd



Clyst St Mary and Sowton Neighbourhood Development
Plan Regulation 14 Consultation Representations



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East Devon District Council
Blackdown House
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Heathpark Industrial Estate
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14th August 2024

Dear Sir/Madam,

**Clyst St Mary and Sowton Neighbourhood Development Plan Regulation 14 Consultation
Representations on Behalf of CR Down Farming Ltd. and Stuart Partners Ltd.**

Introduction

CarneySweeney is instructed to make written representations on behalf of CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, which is being actively promoted as a strategic allocation for new homes and associated uses.

CarneySweeney submits the following representations to Bishops Clyst Parish Council's current pre submission consultation on the proposed revised version of the Neighbourhood Plan (NP) for the parish areas of Sowton and Clyst St Mary.

The representations are made in the context of an EIA scoping opinion request (EDDC ref: 24/0002/EIA) and pre-application request submitted to East Devon District Council (EDDC) in respect of proposed strategic development on land south of A3052 and east of A376. Both documents have been attached at appendix 1 & 2.

The site boundary of the proposed development is shown edged red on the plan below and it can be seen that part of the site is within the Clyst St Mary and Sowton Parish boundary. Whilst we acknowledge that strategic development sites are allocated through district wide plans rather than NPs, our clients would nonetheless be pleased to engage with the Parish in the preparation of its NP because there are many areas where our respective visions and objectives align, giving the opportunity for the proposed development to deliver key elements of the NP.



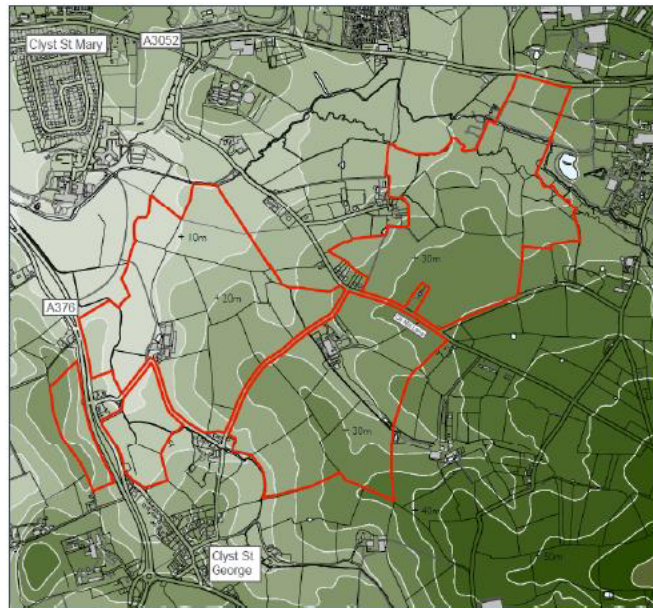


Figure 1 - Site Boundary Plan

Proposed Development at Clyst

Our clients are actively promoting land south of A3052 and east of A376, Clyst St Mary as a strategic development allocation through the draft East Devon Local Plan, with an intention to submit an outline planning application in due course.

The site is a smaller part of the Option 3 site assessed by EDDC during 2022 and 2023 for a second new community. Option 3 scored only marginally lower than EDDC's Preferred Option 1 site. The main reason for this was that at the time, around 20 landowners controlled the site. The sheer number of landowners and the absence of any binding legal control or delivery mechanism raised questions around deliverability. This smaller site is controlled by just three landowners who are contractually bound to promote and deliver the proposed development.

The key point to note is that the proposal is designed as a standalone development. It will deliver social and community infrastructure along with a neighbourhood centre, all in step with new homes. A key characteristic of the proposal is that it is very likely to contribute towards the supply of new homes within five years, supporting EDDC's five-year housing land supply and helping to meet East Devon's acute affordable housing need.

In time, the opportunity exists to complement and support the delivery of EDDC's Preferred Option new community – the Option 1 site. This proposal is not designed to compete with the Option 1 new community in any way.

Pre-application is currently being undertaken with EDDC officers for the proposal, which could comprise the following broad range and scale of uses:



- ✓ Up to 2,000 market and affordable homes, all with a range of sizes, types and tenures.
- ✓ Would provide access and connectivity from the A376 to the A3052. Access from the A3052 could tie in with the proposed access to the Option 1 site (as noted above, EDDC's preferred option for the second new community) on land to the north.
- ✓ Social and community infrastructure including schools, shops, a community hall and other facilities to meet the day-to-day activities of the new residents, albeit at a lower order level to those envisaged at the Option 1 site.
- ✓ Commercial and employment land.
- ✓ Hierarchy of streets.
- ✓ On and off-site pedestrian and cycle connections.
- ✓ Mobility Hub.
- ✓ On and off-site pedestrian and cycle connections.
- ✓ Suitable Alternative Natural Greenspace (SANG).
- ✓ At least 10% BNG.

An early concept masterplan is provided on Figure 2 below identifying the site.

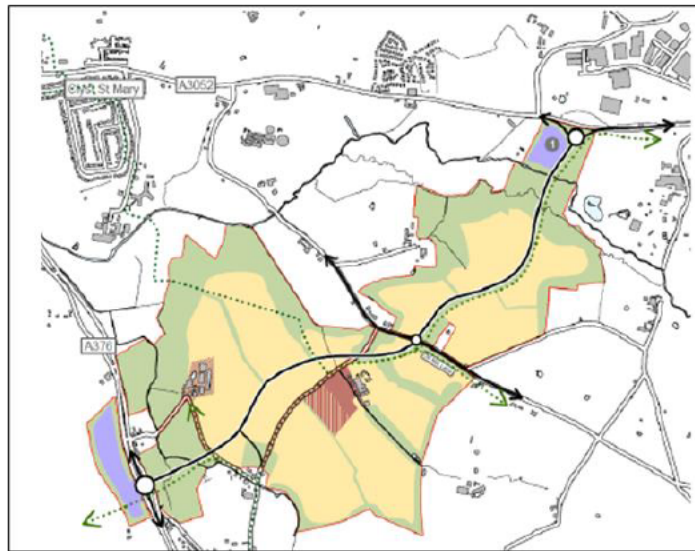


Figure 2 - Early Concept Plan

An approximate overlay of the site boundary (edged blue) and the NP boundary (edged red) is provided on the plan below.



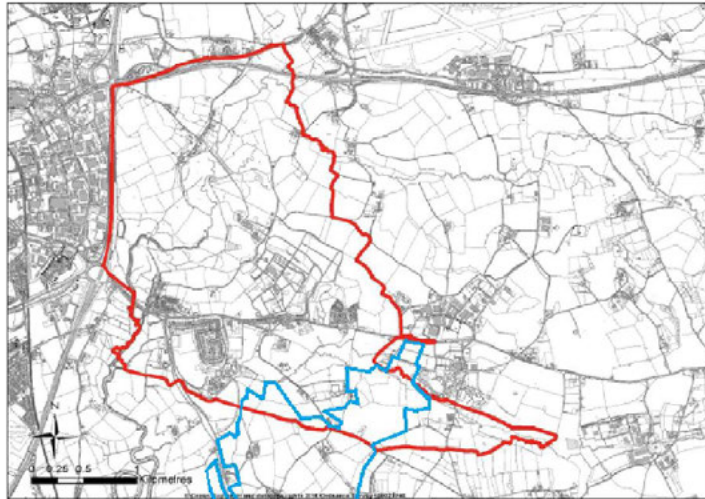


Figure 3 - Site Boundary Overlay with Neighbourhood Plan Boundary

General Comments

It is acknowledged that the Parish Council has expressed concerns regarding for the impact of major development on the sewage system, flood defences, highway capacity, pedestrian safety and the inadequacies of the footpath and cycle network, parking spaces, community facilities, health services and pupil places at the Primary School. We fully appreciate these concerns and are committed to working collaboratively with the Parish Council and other stakeholders to address these issues as part of the strategic development.

By aligning the development proposals with the NP objectives so that it can address some of these matters on site and making financial contributions to off-site infrastructure improvements, we aim to demonstrate that this development can deliver significant benefits to the local community while minimising any wider effects.

Existing Employment Areas

Our client supports the objectives of Policy BisC16 (Business Development), which seeks to support the need for employment land within the area. The proposed development will be carefully designed to complement existing business parks in the vicinity, such as Langdon Business Park, Little Bridge Business Park, Westpoint, and Winslade Park, as shown on the extract of the plan below.



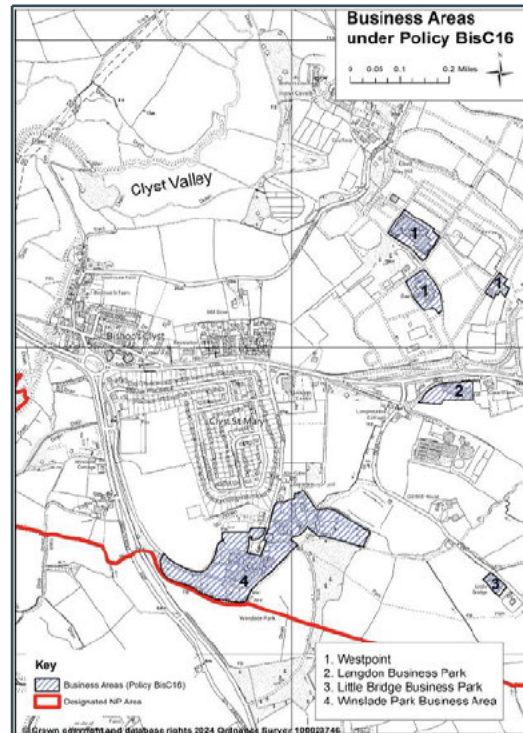


Figure 4 – Existing Business Parks

A mobility strategy will seek to accommodate a range of journey purposes such as walking, cycling and public transport which would connect key employment areas to the new housing proposed. A percentage of these homes will be genuinely affordable which will appeal to workers in the local businesses, something that is of particular interest to our clients who are major local employers and understand the challenges that their employees face in terms of accessing genuinely affordable housing.

Sustainable Transport & Connectivity

Our clients support the principles outlined in Policy BisC09 (Sustainable Development) and Policy BisC18 (Footpaths and Cycleways) which emphasises the importance of sustainable development and the creation of safe, accessible pedestrian and cycle links to provide a connected safe network in and around the neighbourhood plan area.

As highlighted within the Pre-submission Consultation Version of the NP, pedestrian safety, a lack of dedicated cycle routes, and inadequate footpaths as significant transportation challenges. The absence of footpaths on the A376 towards Exmouth and the limited, often unsafe footpath on the A3052 exacerbate these issues for pedestrians, cyclists, and wheelchair users.

The proposed development will prioritise sustainability and incorporate a high-quality active travel network. By creating a new walking and cycling arc helping to connect to Topsham, Ebford, Creaky, Hill Barton Business Park, Denbow Farm, Cranbrook, Skypark, and Exeter, the development will significantly enhance connectivity and reduce reliance on private vehicles. This arc will serve as a primary route for pedestrians and cyclists, facilitating access to public transportation, shared



mobility services, and future mobility solutions. The proposed connectivity arc is shown on the extract of the plan below.

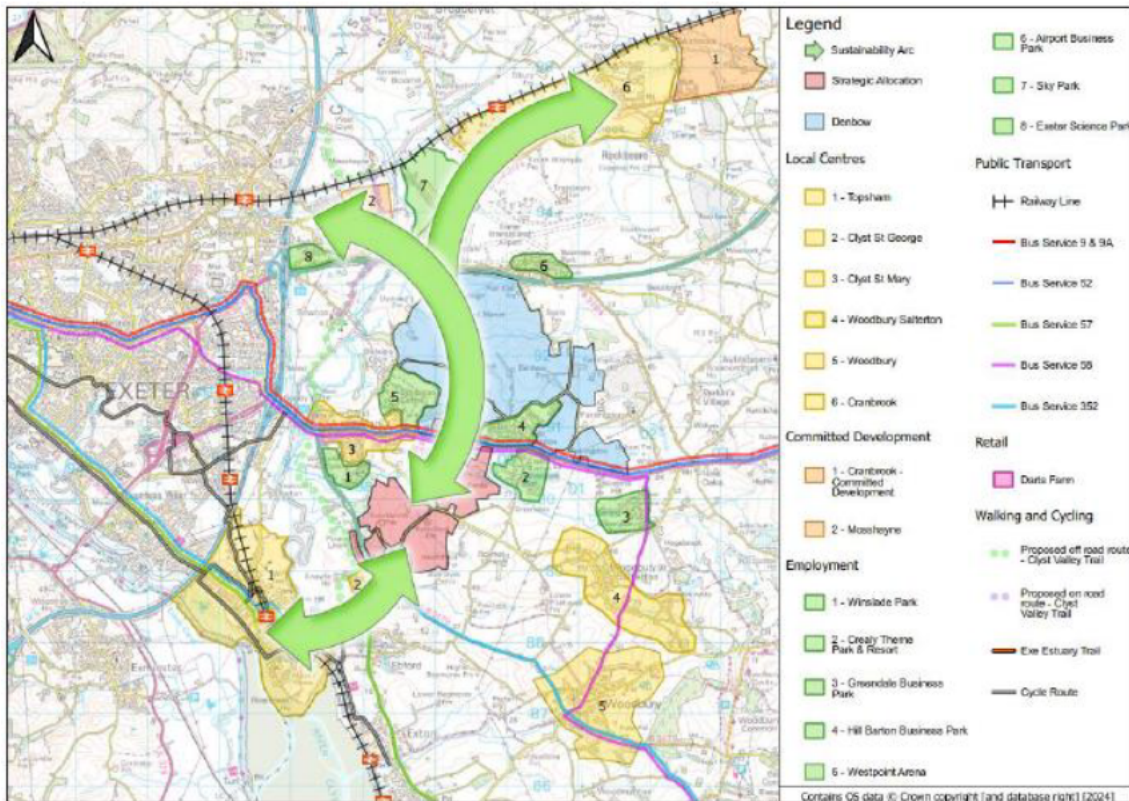


Figure 5- Proposed Connectivity Arc

By integrating these active travel measures, the development will not only address existing transportation deficiencies but also contribute to a healthier, more sustainable community. It also offers the opportunity to create new connections to support amongst other things, the proposed extension to Clyst Valley Regional Park

By providing safe and accessible routes for pedestrians and cyclists, the proposed connectivity measures will significantly enhance the area's infrastructure and promote sustainability. These improvements will address the current deficiencies in pedestrian infrastructure and strengthen connections to both existing and proposed facilities.

Flood Risk and Other Ecology Benefits

The NP notes that:

“Flooding has long been a matter of concern to the community. Substantial tracts of land in the Parish are at risk of flooding. The River Clyst has an extensive flood plain that crosses the neighbourhood area. Grindle Brook to the south is also prone to flooding.”



And that despite the significant investment in flood defences, flooding problems remain behind the new defences.

We are also mindful of the Environment Agency's (EA) helpful and positive comments on the above EIA scoping opinion request.

The proposals provide a clear opportunity not only to provide "betterment" by reducing surface water run-off compared to the current greenfield rate of run-off, but also to consider a more comprehensive approach to addressing wider flooding problems outside the site that may occur up and downstream of the watercourses running through the site by mitigating rates of flow through additional attenuation measures deployed within the site. A full technical assessment of flood risk and surface water drainage is currently underway and this will feed into the masterplan. However, as part of future engagement with the Parish Council, we would be pleased to discuss its wider concerns so that we can factor these in to our masterplan.

The same approach would be adopted in respect of the EA's comments on fisheries and biodiversity and water quality and resources.

Design

The Parish Council is also seeking comment on a Design Code for the Clyst St Mary and Sowton area.

Our clients seek to ensure that the proposed development will be built to a locally distinctive high quality design standard which incorporates the best environmentally friendly technology as well as energy and resource efficiency measures. They are aligned to the net zero policy aspiration of the draft East Devon Local Plan and the locally designated climate emergency.

Our clients commit to working closely with the Parish Council to ensure that any development proposals adhere to the Design Code's objectives and contribute positively to the character and appearance of the area.

Conclusions

In conclusion, these representations demonstrate a clear commitment to the principles outlined in the NP and the wider planning framework. The proposed development is aligned with the plan's objectives to create a sustainable, inclusive, and thriving community.

We would welcome a collaborative approach with Bishop Clyst Parish Council as we progress with the development proposals and would like to be kept informed of the next stages of consultation for the Neighbourhood Plan.



By working collaboratively with the Parish Council and other stakeholders, our client seeks to deliver a development that not only meets local needs but also enhances the quality of life for residents and businesses alike.

It is anticipated that the proposed development will make a significant positive contribution to the area, and the applicant looks forward to engaging with the planning authority to bring forward a detailed proposal.

In the meantime, should you have any queries please do not hesitate to contact us.

Yours faithfully



Simon Coles

Director – Planning

CarneySweeney

cc. CR Down Farming Ltd and Stuart Partners Ltd



APPENDIX 1

EIA Scoping Opinion Request



Our Reference CSE2153

17th July 2024

Ms Thea Billiter
Cranbrook New Community Manager
East Devon District Council
Blackdown House, Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

Dear Thea,

Land South of A3052 and East of A376, Clyst St Mary
Town and Country Planning (Environmental Impact Assessment) Regulations 2017
Request for a Scoping Opinion

Summary of CarneySweeney Scoping Assessment

Chapters to be scoped In

It is considered that the following technical chapters should be scoped in to the EIA:

1. Ecology
2. Flooding and hydrology
3. Landscape and visual character
4. Highways and transportation
5. Climate change
6. Built heritage
7. Archaeology

Chapters to be scoped Out

It is considered that the following chapters should be scoped out of the EIA:



1. Noise and Vibration
2. Air Quality
3. Socio-economic
4. Agricultural land

Introduction

We write in respect of the proposed development of Land South of A3052 and East of A376, Clyst St Mary. We request that the Council provides a formal opinion on the scope of an Environmental Statement (ES) to be submitted in conjunction with an outline planning application (OPA) for the development of up to 2000 residential dwellings together with services and facilities, on and off-site highway improvements, active travel connections and associated ancillary uses including open space, green infrastructure and drainage attenuation. A plan which includes the development boundaries is attached to this letter at **Appendix A**.

The proposed development falls within paragraph 10 (b) (Urban Development Projects) of Schedule 2 of the 2017 Regulations. Part 10(b) relates to Urban Development Projects of more than 150 dwellings (ii) or where the overall area of the Site exceeds 5 hectares (iii). For such Schedule 2 Developments the 2017 Regulations require that Environmental Impact Assessment (EIA) be undertaken where the development is likely to have 'significant effects on the environment by virtue of factors such as its nature, size or location'.

Due to the nature of the proposals, and in recognition of the strategic development opportunity the Site represents, the applicant has decided to undertake a focused EIA of the proposed development and the consequential ES will be submitted in connection with the OPA.

To assist the Council in forming its Scoping Opinion, and in accordance with Regulation 15(2) of the 2017 Regulations, we hereby enclose:

- Masterplan Study in East Devon – Grange Architects (March 2022);
- A brief description of the nature and purpose of the development including its location and technical capacity;
- An explanation of the likely significant effects of the development on the environment; and
- Such other information or representations as the person making the request may wish to provide or make.

The information contained within this Scoping Request therefore sets out the anticipated scope of the EIA and where possible, provides details about the potential effects based on relevant existing surveys and studies. We consider that the topics to be included within the ES will be fully comprehensive.



The ES will be the product of the EIA process and the ES itself will detail the methods of prediction of environmental impacts, the assessment of significance and consideration of cumulative effects.

Site Location and Description

The Site is located to the south of the A3052 and to the east of the A376 between Clyst St Mary and Clyst St George, as identified on Figure 1 below:

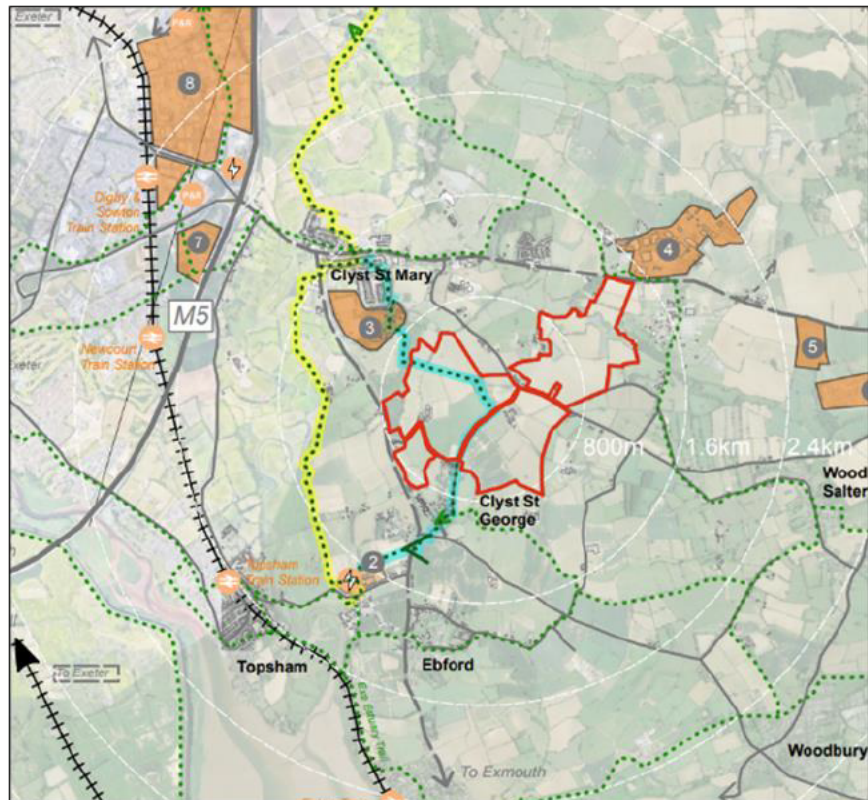


Figure 1: The Site Location

The Site extends to approximately 157 hectares and is currently in agricultural use (predominantly arable). It is formed of field parcels comprising existing farms (Shepherds Farm, Kenniford Farm & Courtbrook Farm), scattered trees and hedgerows. The land is relatively flat but gently rises in the southeast.

Crealy Theme Park and Resort adjoins to the Site to the north-east and the M5 runs north/south to the west of the Site. Exeter city centre is approximately 6.5km to the north-west and Topsham is approximately 2km to the south-west. The Site and its surrounding area has a mixed urban and rural context with a series of existing road networks connecting Clyst St Mary and surrounding villages into the strategic road network.



Access to the Site is available in various locations at existing field entrances at Oil Mill Lane and other unnamed roads. A number of existing farms and residential properties are interspersed across the Site and Grindle Brook runs in an east-west direction in the most northern field parcel.

The Site is in a sustainable location for housing development with the ability to provide the local services and facilities necessary on a daily basis as well as connections to local services and facilities. The Site is some 250m southwest of the Hill Barton Business Park and approximately 2km to the west of Greendale Business Park which together offer a range of employment, retail and leisure opportunities. Greendale Farmshop is some 1.5km to the east.

Bus stops are located on the A3052 and provide regular services to Seaton, Honiton, Sidmouth and Exeter. Exeter contains a wide range of supermarkets and employment opportunities including those located at Sowton Business Park and the city centre. Services from Exeter Central Station and St David's provide a wide range of further connections.

Junction 30 of the M5 is located approximately 2.8km to the west and provides direct access to Taunton and Bridgewater to the north and Newton Abbot to the south.

National Cycle Network Route 2 is located approximately 1.5km to the southwest of the site which provides a largely traffic free link along the eastern edge of the Exe Estuary west via the Science Park.

The Site does not contain or lie adjacent to any statutory wildlife designation but is approximately distanced 400m east to the Exe Estuary. The Site falls within the 10km zone of influence for the East Devon Pebblebed Heaths Special Area Conservation (SAC) East Devon Heaths Special Protection Area (SPA) and the Exe Estuary SPA.

The majority of the Site falls within Flood Zone 1. Parts of the site to the north and west fall within Flood Zones 2 and 3 in the areas in closest proximity to Grindle Brook.

There are two listed buildings within the site which include Courtbrook Farm and Kenniford Farm, both of which are Grade II listed. There are also a number of listed buildings surrounding the site within the neighbouring villages at Clyst St Mary and Clyst St George.

Development Description and Proposals

The proposed development is a mixed-use development consisting of residential, commercial, education and community uses with a local centre and associated landscaping and open space provision and comprises the following elements:

- Up to 2,000 market and affordable homes, all with a range of sizes, types and tenures;



- Access from the A376 and A3052. Access from the A3052 will include the future opportunity to tie in with the proposed access an adjacent strategic development site (known by the Council as Option 1) on land to the north;
- Social and community infrastructure including early years and a primary school, retail units, community hall and mobility hub;
- Commercial and employment land (not including Use Class B2 and B8 uses) primarily integrated with residential uses;
- Hierarchy of streets;
- On and off-site pedestrian and cycle connections;
- Public open space including play facilities, parks, community allotments/orchards, and formal sport and recreation facilities;
- Suitable Alternative Natural Greenspace (SANG); and
- At least 10% BNG.

The Site will be accessed from A376 with a network of pedestrian and cycleways to create a hierarchy of 'liveable streets' that would seek to discourage through traffic, while still providing strong connections for new residential into the surrounding area. The focus will be on creating active travel connections between existing retail, employment and leisure destinations in the immediate locality that are currently car-dominated.

A range of residential dwelling types (including an element of affordable housing), sizes and tenures is proposed to encourage an 'inclusive' community.

The Site will provide employment uses integrated with residential areas so as to offer new residents a range of employment opportunities.

The Site will accommodate community and education facilities (including early years and a new primary school) to meet the needs of all age groups that will live at the new village. The size of the primary school will be discussed with the education authority; however, depending on local need, it could be up to a two-form entry.

The intention is to establish an appropriate balance of new homes and the employment, social and community uses so as to optimise trip internalisation.

The proposed development will integrate sensitively with its local landscape and ecology setting, seeking to provide for the long-term enhancement of biodiversity within and around the new development.

Open spaces and facilities will be readily accessible to all residents with convenient and attractive pedestrian and cycle links to local destinations and access to high quality public transport services.



An initial Indicative Masterplan is at Figure 2 (overleaf) which illustrates how the site could accommodate a residential-led mixed-use development. This masterplan is of its time and does not necessarily reflect accurately the above; it is being refined as a result of technical survey and assessment.

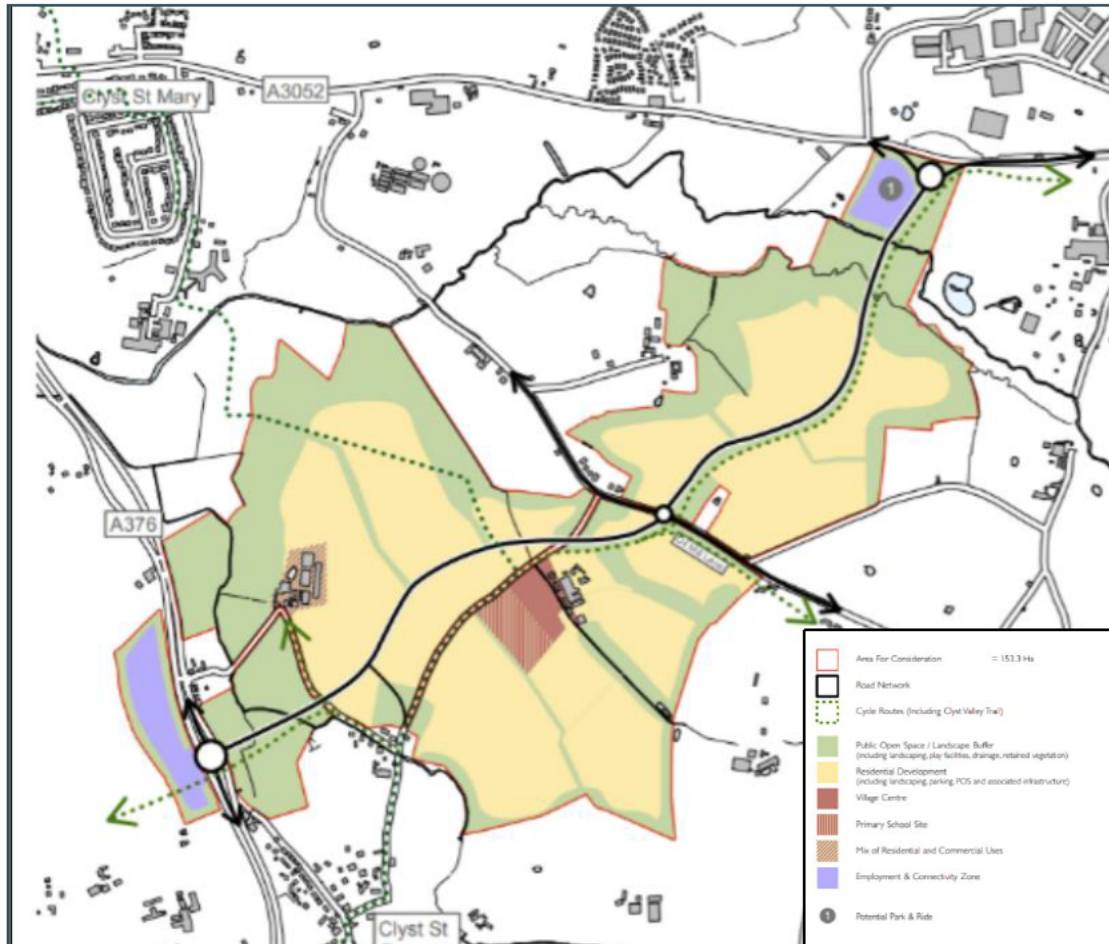


Figure 2: Early Masterplan Concept for Proposed Strategic Allocation

Proposed Structure of Environmental Statement

The ES will be structured logically thereby enabling all relevant environmental information to be found quickly and easily. The assessment of each environmental topic will form a separate chapter of the ES.

The existing and likely future environmental conditions in the absence of the project are known as 'baseline conditions'. Each topic based chapter will include a description of the current (baseline) environmental conditions. The baseline conditions at the site and within the study area form the basis of the assessment, enabling the likely significant effects to be identified through a comparison with the baseline conditions.



The EIA Regulations require the identification of the likely significant environmental effects of the proposed development. Each topic chapter will take into account both the sensitivity of receptors affected and the magnitude of the likely impact in determining the significance of the effect from the proposed development.

The EIA Regulations require that where significant effects are identified '*a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce or, if possible, offset likely significant adverse effects on the environment*' should be included the EIA and associated technical studies will reflect current guidelines and relevant legislation and will be carried out in accordance with statutory guidance, including the requirements for the contents of an ES as set out in Schedule 4 of the EIA Regulations.

Cumulative Assessment

The cumulative effects of the proposed development in conjunction with other proposed schemes will be considered within each topic chapter. The cumulative effects assessment will consider any developments that are formally in the planning system at the time of submission. Developments that are built and operational at the time of assessment will be considered as part of the baseline. A list of proposed developments and planning policy allocations has been provided below, although given the LPAs knowledge and background, it is requested through the scoping process, the LPA provides a definitive list of sites to be included within the cumulative assessment.

- East Devon's Second New Community – although the land is not subject to a planning application at this point in time, it is envisaged that it will be when this site comes forward, and therefore, the cumulative affects between this site and East Devon's second New Community will need to be considered.

As part of your formal Scoping Opinion, we should be grateful if you would confirm which other development sites would need to be considered as part of any cumulative assessments.

Given the aforementioned, for each environmental topic, the following will be addressed within each ES Chapter:

- Summary of Relevant Policy
- Methodology and Assessment Criteria
- Baseline Environment;
- Mitigation within the Submitted Design;
- Potential Environmental Effects of the Scheme including cumulative effects;
- Additional Mitigation, Compensation and Enhancement Measures
- Assessment Summary and Residual Environmental Effects; and
- Non-Technical Summary.



Content of the Environmental Statement

The ES will include the following Chapters and it will be presented in three separate documents, namely:

- i) A **Non Technical Summary** (as a standalone document).
- ii) A **Written Statement** (supported by relevant Figures and Appendices relevant to each topic chapter).
- iii) **Technical Appendices**.

The Written Statement will comprise the main document and it will be structured as follows:

Introduction

This chapter will provide the introduction to the ES, including details of the application, need for EIA and the structure of the ES, as well as details of the assessment team, the Applicant and how to obtain copies of the ES.

Details of the overall approach to the EIA will also be set out in this chapter, together with details of the scoping process, the consultations undertaken, and the overall approach to the assessment of significance. Topic-specific methodologies, such as survey methods, will be provided in each topic chapter along with assessment against relevant planning policies specific to that discipline.

Description of the Site and Development Proposals

The EIA will include a description of the development proposals which will form the basis of the assessment of effects. The EIA Regulations require an ES to include: *'A description of the development comprising information on the site, design and size and other relevant features of the development.'*

This Project Description chapter will also include details of the site, together with a description of the key components of the proposed development. Where mitigation measures have been identified and developed through the EIA process, and have been incorporated as part of the project, details of these measures will be set out within the Project Description chapter.

The chapter will also briefly set out the need for the proposed development and the alternatives considered by the applicant, including a description of boundary alternatives, alternative designs, and alternative layout options.

Planning Policy Context

This chapter of the ES will provide an overview of the relevant legislative and planning policy context having regard to national, local policy documents as well as any other material considerations, as



relevant to the Local Planning Authority. Any additional topic specific legislation or policy required to be referred to as part of the technical assessments will be set out within the relevant topic chapter.

The assessment will make reference to the policy documents that have been adopted at the submission date. If there are any draft policy documents which are being consulted upon at that date but have not been adopted, they will be referred to.

In addition, a separate Planning Statement will be submitted in connection with the OPA that will provide a detailed analysis of the proposed development against the planning policy context. It is envisaged that the OPA subject of this Scoping Opinion request will be submitted later in 2024. It is our intention to continue to engage with the Local Planning Authority via a Planning Performance Agreement (PPA) as the OPA is developed and also throughout the next stages of the Local Plan Review process.

Ecology

The site does not contain or lie adjacent to any statutory wildlife designation but is approximately distanced 400m east to the Exe Estuary. Much of the Estuary has European Protected status as a Special Protection Area (SPA); parts are also a RAMSAR site and SSSI Exmouth marks the Western end of the District and East Devon Coast World Heritage Site (Jurassic Coast). The East Devon Heaths SPA is a network of heathland sites which are designated for their ability to provide a habitat for internationally important breeding populations of nightjar and Dartford warbler. The Exe Estuary SPA is designated for its internationally important populations of birds, as well as RAMSAR for wetlands of international importance.

A Special Verge Site (a central reservation along Exmouth Road) is located approximately 10m to the west boundary. A further county wildlife site (Clyst Marshes CWS) is an identified Local Wildlife Site within 1km of the site.



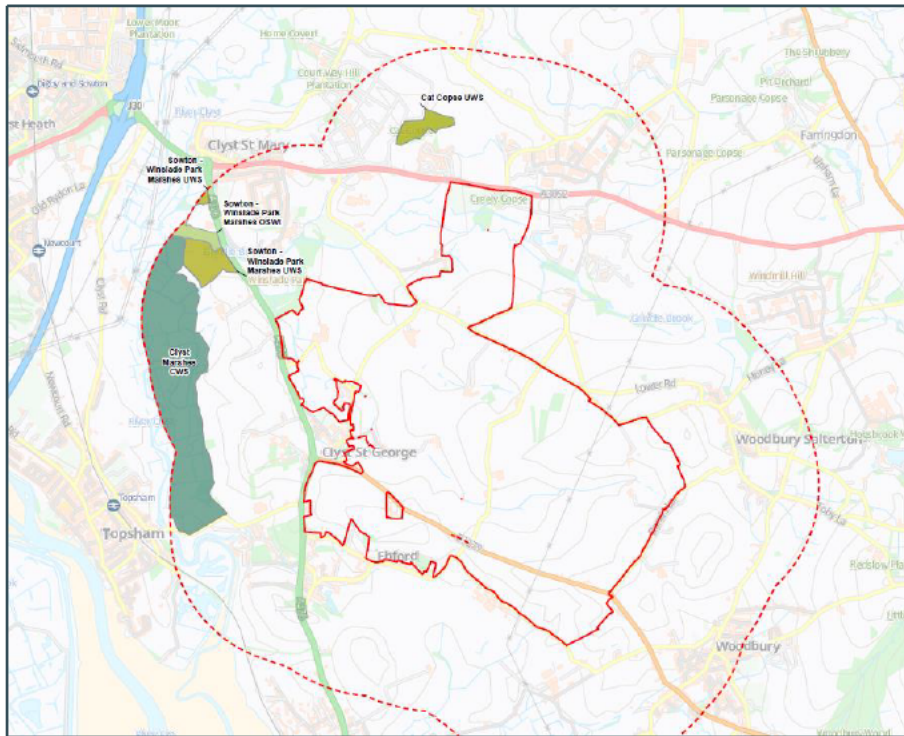


Figure 3 – Locally Designated Sites within 1km of Option 3

The Site falls within the 10km zone of influence for the East Devon Pebblebed Heaths Special Area of Conservation (SAC) East Devon Heaths SPA and the Exe Estuary SPA. The ES will assess the potential for the proposal to effect designated sites. The likely magnitude of the impacts will be assessed during the construction and operational stages.

The site largely comprises farmed cropland fields which as a result, are expected to be of low baseline ecological value. The Options Appraisal for a potential new settlement completed by CBRE on behalf of the Council in 2022 suggests that a number of protected species including dormice, bats, birds and invertebrates are likely to be present on site. As such a habitat conditions assessment along with a number of species surveys have been undertaken and/or are currently underway to confirm any presence. Such surveys are focussed on bats, hazel dormouse, nesting birds, reptiles, amphibians, badger, hedgehog and otter.

The potential impact of the proposal upon features and species of nature conservation interest and opportunities for habitat creation will be assessed within the ES. The concept masterplan will ensure that proposed new land uses are designed around existing green infrastructure with key wildlife corridors providing connectivity across the site retained whilst also providing opportunities for biodiversity enhancement. Where necessary, mitigation and avoidance measures will be identified and incorporated into the development proposals from the outset to ensure that the proposed development meets regulatory, national and local planning policy (by avoiding 'significant harm to biodiversity' and delivering a proportionate net biodiversity gain). A Biodiversity Net Gain (BNG)



matrix assessment will be carried out for the site and all opportunities for ecological enhancements within the site will be incorporated where possible.

The assessment of ecological effects for the ES chapter will be undertaken in accordance with the ecological impact assessment guidelines published by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018).

Flooding and Hydrology

There are a number of watercourses that cross sections of the site, including two small unnamed streams - one running to the east of Clyst St George and joining the Grindle Brook near Winslade Park before flowing into the River Clyst, and one running past Kenniford Farm and into the Grindle Brook.

The north of the site is drained by the Grindle Brook and its tributaries which rise on the Pebble Bed Heaths. The valley in which Grindle Brook runs through gradually flattens out towards the west, where it flows through a broad floodplain and joins the River Clyst west of Winslade Park. The majority of the Grindle Brook falls outside of the redline boundary for the site.

The majority of the site falls within Flood Zone 1 which is classified as having a low to medium flood risk. Parts of the site to the north and west fall within Flood Zones 2 and 3 in the areas in closest proximity to Grindle Brook and the unnamed stream which runs through the site along the western boundary.

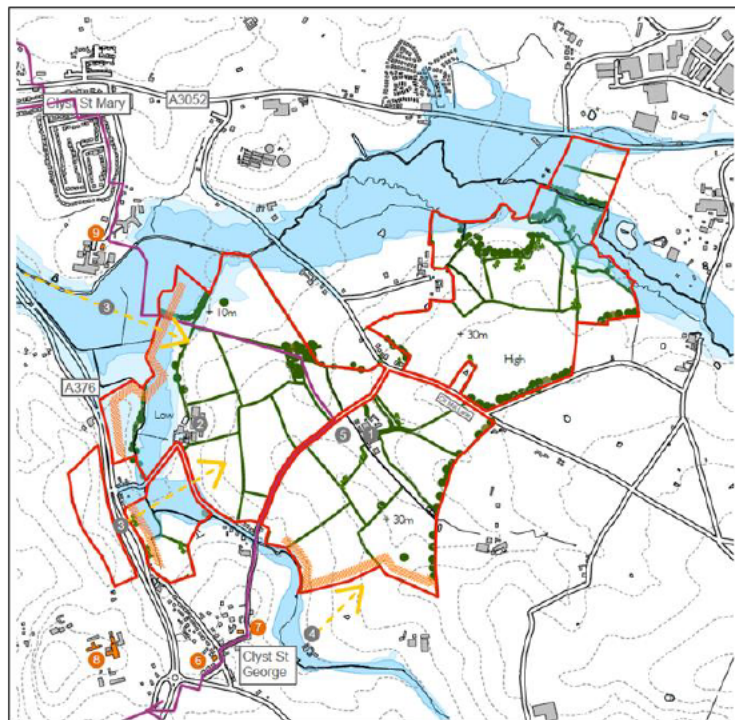


Figure 4: Flood Risk



Land within the flood zone will be incorporated into well designated and implemented drainage and water mitigation strategies and the land will be used for open space (the Clyst Valley Regional Park/CVRP) and biodiversity gains.

A site-specific Flood Risk Assessment (FRA) will be submitted with the application and will form the basis of the ES Chapter which would analyse the risks in more detail, including the flood risks to and from the development proposal. This would include an assessment of the risk to the development from all relevant flooding sources (i.e. fluvial, surface water, sewers, groundwater and artificial sources). Built development will be steered into Flood Zone 1.

The FRA will also include a conceptual surface water drainage strategy, which would evaluate the various Sustainable Drainage Systems (SuDS), ensuring that there would be no increase in runoff rates as a result of the proposed development.

As well as assessing the potential impacts of the proposed development on flood risk, the ES chapter will consider potential impacts of the development on local hydrology, including impacts on water quality arising from runoff from the site (during both construction and operational phases). Mitigation measures would be proposed and incorporated, where necessary.

Landscape and Visual Character

There are no nationally designated sites within the site, but there are several nationally and internationally-designated sites surrounding it, which include the Pebble Bed Heaths to the east, which are designated SSSI, SPA and SAC. The west of the Site is the Exe Estuary, containing wetland habitats designated SSSI, RAMSAR, and SPA.

The Devon Landscape Character Assessment is undertaken at a county-wide scale by The Devon Landscape Policy Group and identifies Devon Character Areas (DCAs) for the purpose of providing an evidence base for local development frameworks and plans, as well as setting out strategies and guidelines for the protection, management and planning of the landscape. The document sets out spatial priorities at County Level.

The Character Assessment identifies that the site is within the Clyst Lowland Farmlands DCA. The special qualities and features of the Clyst Lowland Farmlands include:

- Well managed, generally low hedgerows enabling views to distinctive wooded skyline hills (Pebble Bed Heaths), which help provide orientation and sense of place.
- Sense of tranquillity enhanced by natural qualities of the meandering streams and rivers.
- Killerton SSSI valued for its igneous geology exposed in small disused quarries.
- Other nature conservation interest mainly limited to patches of unimproved neutral grassland and marshy grassland or fen, traditional orchards, stream margins and areas of parkland containing veteran trees.



- Rich cultural heritage of the area's hilltops, such as Bronze Age barrows, Iron Age hillforts and ancient settlement remains.
- Concentration of historic parklands in the north-west including Sprydon Park (National Trust), Killerton Park and House (National Trust) and Rockbeare Manor, with one of the largest populations of veteran trees in Devon.
- Picturesque villages with traditional buildings linked by narrow winding lanes crossing historic stone bridges; many Listed Buildings, and Conservation Areas at Sowton, Whimble and Ottery St Mary.
- Many buildings constructed of local stone, e.g. Killerton Chapel.
- Clyst St Mary historically associated with the 1549 Prayer Book Rebellion.
- William Makepeace Thackeray lived at Ottery St Mary; his novel Pendennis was set here.

The East Devon and Blackdown Hills Landscape Character Assessment was produced by Fiona Fyfe Associates on behalf of East Devon District Council (EDDC), working with Devon County Council (DCC), the Blackdown Hills AONB partnership and the East Devon AONB partnership. The report identifies the majority of the site to be within LCT 3E Lowland Plains.

The special qualities of LCT 3E Lowland Plains are as follows:

- Historic small parks and gardens, containing a high proportion of mature and veteran trees.
- The range of settlements and building styles, from sleepy coastal villages to Cranbrook new town.
- Its unassuming but still attractive rural feel, particularly away from larger settlements and roads.

The Clyst Valley Landscape Character Assessment March 2022 was commissioned by EDDC and undertaken by Fiona Fyfe Associates and seeks to support the vision and work of the CVRP and to inform the evidence base of the new Local Plan, including the CRVP policy boundary. The report identifies the Site to be within LLCA J: *Clyst St Mary Farmlands*, as shown by figure 5 below.



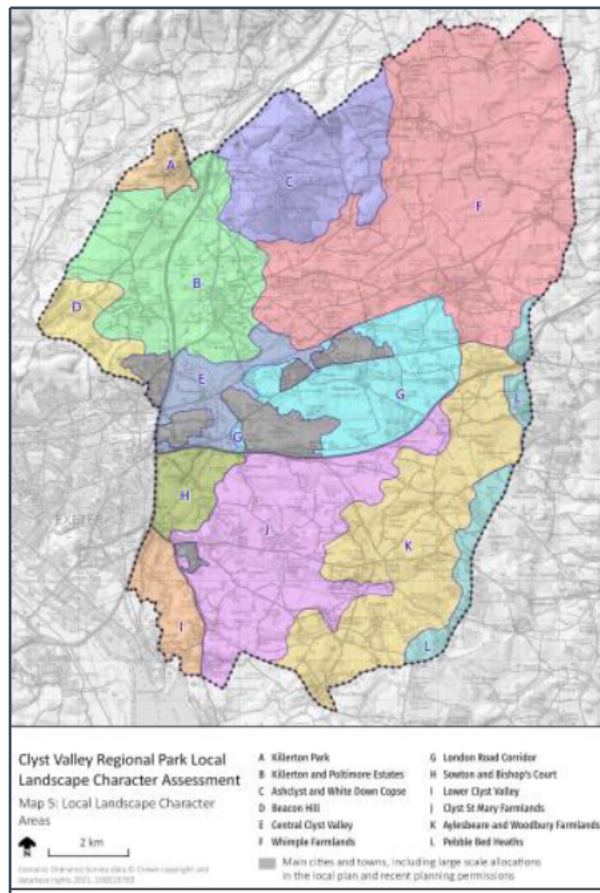


Figure 5 – CVRP Local Landscape Character Assessment

A landscape sensitivity assessment for a New Community East of Exeter was produced on the 17th October 2022, by Fiona Fyfe Associates. The assessment looked at 3 different options for the position of a new settlement, which incorporated this site (referred to as Option 3). The assessment considered that land to the north of the site has the lowest levels of landscape sensitivity. Parts of the northern extent of the site have a relatively flat and low-lying topography with existing trees which form a strong structure to the landscape and would assist in screening development and limiting visibility from surrounding areas.

Land to the south of the site (along the Ebford slopes and the ridge followed by Woodbury Road) has invisibility with land to the south and the East Devon AONB, and land the east, where the land is relatively steep and elevated with intact medieval field patterns. The setting of Clyst St George to the south west of the site, is also sensitive. Land to the south is therefore considered to have the most landscape sensitivity and development of such parcels would likely cause possible landscape and visual impacts.

The detail of the proposed development will be assessed in the ES through the production of a Landscape and Visual Assessment (LVIA). This assessment will be based on latest industry guidelines and will consider the effects on both the local landscape resource and the wider context of the site;



from the physical effects on site-based features and characteristics, to the potential effects on the wider landscape character. It will also consider the potential visual effects upon receptors within the site, bordering the Site and within the surrounding area. The LVIA will consider sensitive viewpoints from properties and other sensitive receptors as agreed with the Council. Mitigation measures will be recommended and incorporated as appropriate.

Highways and Transportation

The Traffic & Movement Chapter of the ES will present the impact of traffic and movement on people and the environment. A Transport Assessment (TA) will be submitted with the planning application.

The approach to assessment will comprise a masterplanning and vision-based approach rather than predict and provide. The masterplanning and vision led approach will seek to maximise community, carbon reduction and health benefits and in so doing will promote a land use and mobility strategy that will seek to accommodate a range of journey purposes both within the site and vicinity. There will be an arc of movement across the Site which provides sustainable connection to key existing population and commercial centres, providing a viable alternative to travel by car for trips further afield.

Whilst the strategy will not prevent vehicles trips, the strategy represents a viable alternative to costly road infrastructure schemes by impacting existing travel habits in addition to those attributed to future residents.

It is considered that the greatest environmental change will be when the project traffic is at the largest proportion of the total flow. The EIA will include an assessment for the Construction Phase; and the First year of each phase.

A Traffic and Movement EIA scoping chapter note enclosed at **Appendix B**, has been prepared by SLR and should be read alongside this letter.

Climate Change

The UK Climate Change Projections (UKCP18) as published by the Met Office, set out that climate change is projected to lead to increasing annual temperatures, decreasing summer rainfall and increasing winter rainfall as a result of increasing global Greenhouse Gas (GHG) emissions. This applies to the UK, including the Site.

In this context, EDDC declared a climate emergency in 2019 and has a vision to become a carbon neutral council by 2040, working within a low carbon economy and lifestyle.

It is therefore recognised that we live in a time of growing awareness of the sensitivity of the climate around us and the relationship between human interactions and the changes to the climate. The



development of houses and their subsequent occupation involves a range of processes and outputs that have the potential to further affect the climate. Therefore, this needs to be addressed within the ES. Consideration will be given to the full range of potential effects including the loss of a green field, the need for protection of trees, carbon storage in building products and the future life of the housing.

The EIA regulations require the consideration of Climate Change, including how resilient the proposed scheme is to the effects of climate change, and how the proposed scheme mitigates its impact on climate change through Green House Gas (GHG) emissions.

The proposed development proposes residential, commercial and community buildings which can adopt energy efficient construction techniques and the integration of energy efficient technologies where possible/viable therefore reducing the emission of GHGs and the use of other resources in response to the threat of climate change.

Proposed development will seek to meet the net zero policy aspiration of the draft Local Plan and the locally designated climate emergency. It will seek to create a sustainable new settlement in its own right, which will be built to locally distinctive high quality design standards, incorporating the best environmentally friendly technology as well as energy and resource efficiency measures.

Built Heritage

There are two listed buildings within the Site which include Courtbrook Farm and Kenniford farm, both of which are Grade II listed. There are a number of listed buildings surrounding the site and within the neighbouring villages at Clyst St Mary and Clyst St George, including:

Clyst St George:

- Pound Living, Grade II
- Manor House, Grade II
- Cade's Cottage, Grade II
- Courtbrook Farmhouse, Grade II
- Lady Seaward Church of England Primary School, Grade II
- Mairanne Pool, Grade II
- The Old Rectory, Grade II
- Stocks adjacent to North Wall of Tower of Parish Church, Grade II
- Parish Church of St George, Grade II
- Lychgate and adjoining churchyard wall to south of Parish Church, Grade II
- Pytte House, Grade II

Clyst St Mary:

- Terrace Walk 133 metres south of Winslade Park, Grade II



- Winslade Park, Grade II*
- Tomb slab 1 metre west of south end of Parish Church, Grade II
- Salter Tomb Chest 0.5 metre east of Nave of Parish Church, Grade II
- Parish Church of St Mary, Grade II
- Cotsford Tomb chest 2 metres west of Nave of Parish Church, Grade II
- Grindle House, Grade II
- Red Lodge, Grade II
- White Lodge, Grade II*
- Myrtle Cottage, Grade II
- Craig's Cottages, Grade II
- The Maltsters' Arms, Grade II

South of A3052:

- Linden Lee, Grade II
- Coxe's Dairy or Farmhouse, Grade II
- Old Kiddicott, Grade II

There is also a single Scheduled Monument within the search area. This is a post-medieval animal pound located adjacent to the B3179 to the east of Clyst St George; it is located 300m south of the site.

Each of these buildings and structures will be considered in relation to the proposals' potential to harm their significance through change to setting.



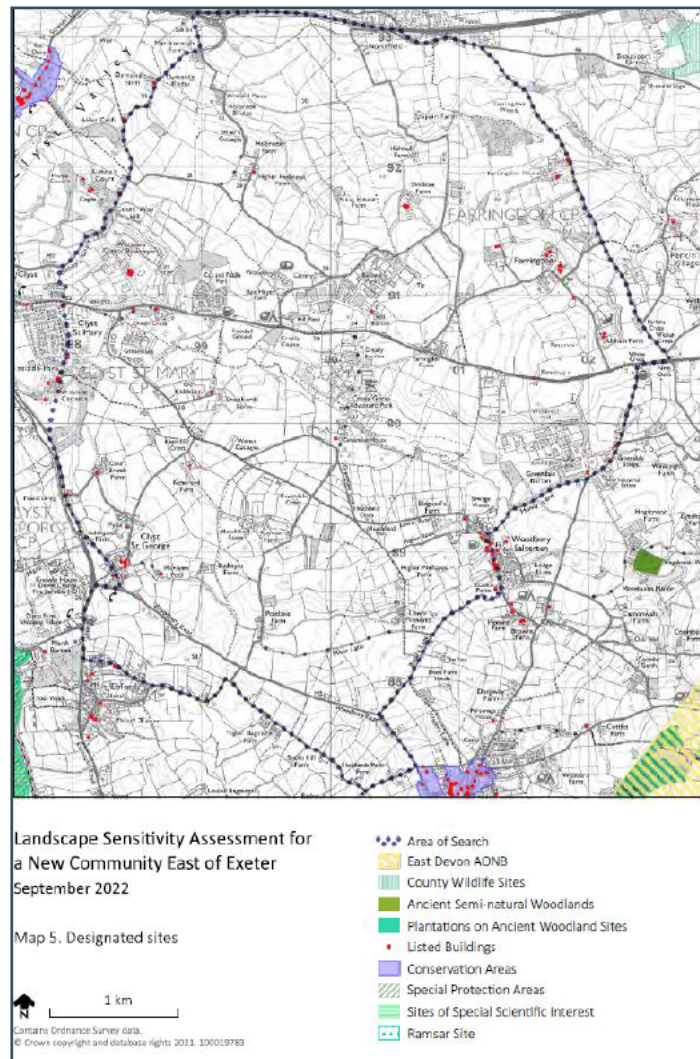


Figure 6: Location of Built Heritage Assets

A Baseline Heritage Assessment will be prepared and will form the basis of the ES chapter. In order to reach an understanding of the level of any effect that a proposed development may have on a heritage asset, it is necessary to understand the importance of that asset, the proposed impacts and the assets' significance. Using a matrix that assesses both 'asset significance' and 'impact magnitude', the assessment will then produce an assessment of the level of the effect of the proposed scheme on each asset. These matrices will be included within the ES Chapter.

There are no national government guidelines for evaluating the importance of all types of heritage asset. However, advice on the criteria to be used in assessing the significance of heritage assets, as well as an outline methodology, is included in Historic England's *Managing Significance in Decision-Taking in the Historic Environment*, *Historic Environment Good Practice Advice in Planning: 2* (2015), as well as the earlier English Heritage guidance *Conservation Principles – Policies and guidance for the sustainable management of the historic environment* (English Heritage 2008). This guidance states that heritage assets are considered to have significance based on their evidential, historical,



aesthetic or communal value. The *NPPF* also includes the criteria of architectural and artistic value, and states that setting can also contribute to an asset's significance. Additional guidance is contained within Historic England's *Statements of Significance: Analysing Significance in Heritage Assets* (2019). Historic England's *The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3* (Historic England 2017) and the *NPPF Planning Practice Guidance* (Ministry of Housing, Communities & Local Government 2019) can also be used to assess the contribution of setting to significance.

Using the matrix approach set out above, the assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor and the magnitude of change to determine significance, on a scale of large or high, medium, small or low and negligible. Significant effects will be determined through professional judgment.

The Built Heritage ES chapter will assess the significance of the heritage assets and identify any harm arising from the proposals. Such risks will inform the design and masterplanning.

In any event, all practical and reasonable measures which can be implemented to preserve or enhance designated heritage assets within or as relevant nearby the site will be considered and the selected measures, in accordance with best practice standards, will be outlined within the ES Chapter. It is anticipated that any impact on the built heritage arising from the proposed development can be mitigated through careful masterplanning to ensure that the development seeks to protect and enhance the setting of the surrounding heritage assets. This may include landscape buffers to protect the environment around the historic buildings and structures.

Archaeology

The Devon Historic Environment Record shows that, as noted under built heritage above, there are no Scheduled Monuments within the site, but a single Scheduled Monument in the near vicinity of the Site. No other designated archaeological areas (such as World Heritage Sites, Battlefields and Registered Parks and Gardens) are present on the site itself. The Clyst Heath battlefield associated with the Prayer Book Rebellion is mapped approximately 700m to the northwest of the site, largely on the opposite side of Clyst St Mary (Devon Historic Environment Record ref. MDV10109).

Archaeological interventions within the site include a geophysical survey and trench evaluation at Shepherds Farm (HER refs EDV6608 and EDV6574) and a trial trench evaluation at Kenniford Farm (EDV6630). These have uncovered prehistoric flint tools and field boundary ditches of Romano-British and post-medieval date. A small length of the north boundary of the site is defined by the A3052 road which is regarded as the possible line of a Roman road connecting Dorchester and Exeter (MDV115594) and immediately on the opposite side of this road extensive evidence for Romano-British rural settlement has been uncovered by archaeological excavations (EDV5314).



The Devon Historic Landscape Characterisation project shows a range of field types across the Site, which include some areas of Barton Fields (dating from 15th-18th Century) and post-medieval enclosures. A large area of medieval enclosures based on strip fields is mapped between Shepherds Farm and Greendale House. To the south of Kenniford Farm an area of potential medieval strip fields has been mapped (MDV113296). Several areas of post-medieval orchards and quarry pits have also been mapped.

The Site therefore has the potential to encompass previously undisturbed buried archaeology of prehistoric, Romano-British, medieval and post-medieval date. These are currently of unknown significance and will be assessed further within the ES and mitigation measures incorporated as necessary.

Topics to be scoped out of the EIA

5. Noise and Vibration
6. Air Quality
7. Socio-economic
8. Agricultural land

Each topic will be discussed in more detail below:

Noise and Vibration

The Site is located in a semi-rural location, which has a mix of residential, business and recreational uses. The surrounding uses do not involve activities that generate significant levels of noise.

Whilst there may be some temporary impacts associated with construction activities which may generate noise and vibration on surrounding receptors, it is acknowledged that these will be limited only to the construction phase and will not create a long-term significant impact. Mitigation of impacts during the construction phase will be based upon best practice methods set out within a Construction Environmental Management Plan (CEMP) which will be submitted and approved prior to the commencement of development. The CEMP will also include recommendations for monitoring noise and vibration. Where phased construction and occupation of the site is proposed, an assessment of construction noise will be undertaken in respect of the construction of subsequent phases of development upon existing, occupied phases.

The residential units once occupied are not considered to be a significant source of noise.

On the basis of masterplanning and vision-based approach to be used by the scheme's transport consultants, it is considered that there will be no change in roadside noise level or vibration associated with the development which would result in a significant impact. The vision of a self-



contained new settlement, which provides high quality non-car connections to existing and proposed facilities, which encourage future occupiers to cycle or walk to schools, shops, leisure or work.

The noise impacts of the development will however be considered within a Noise Impact Assessment and submitted separately to but alongside the ES in connection with the OPA.

Air Quality

It has been identified that the Site is not located within or near an Air Quality Management Area (AQMA).

Whilst it is recognised that there may be some temporary impacts associated with construction activities which may generate dust and affect local air quality, it is acknowledged that these will be limited only to the construction phase and will not create a long-term significant impact. Mitigation of impacts during the construction phase will be based upon best practice methods set out within the CEMP. The CEMP will also include recommendations for monitoring of dust during construction.

The vision for the proposed development is to meet the Council's zero carbon ambitions. The proposed development will adopt energy efficient construction techniques as controlled by Building Regulations, and the integration of energy efficient technologies where possible. It is envisaged that energy to heat the new buildings will be from renewable sources.

With regard to transport, the masterplan will focus on self-containment and trip internalisation by creating high quality non-car connections to existing and proposed facilities. It is expected that future residents might be able to access the majority of their day-to-day needs on-site, whether that be access to schools, to shops, to leisure or work. Beyond that, they will be able to access neighbouring destinations on foot or bicycle easily, such as schools in Clyst St George or Clyst St Mary, or even Topsham, employment at Hill Barton Business Park or Odhams Wharf, retail and leisure at Dart's Farm or Crealy and a wide range of employment, leisure and childcare at Winslade Park. This opens up the opportunity to capture trips from these places, connecting them to each other and the development, enabling the transition from the car, where walking and cycling now becomes the natural choice. The reduction of trips by the car will mean that there is no material increase in pollutant emissions from the proposed development. There is also a potential to deliver a betterment to existing baseline conditions.

Based on the above, it is considered that there would not be a significant environmental impact that would warrant a chapter in the ES. An Air Quality Assessment will be submitted in connection with the OPA.



Socio Economic

East Devon has a population of just under 146,300 people, the highest of the eight districts in Devon. Residents of East Devon are among the oldest in the country with a median age of 51.2, compared to the UK figure of 40.3.

The proportion of age profiles within East Devon is as below,

- 26,527 children aged between 0 and 16, equating to circa 17% of the population
- 79,068 people aged between 18 and 64, equating to circa 52% of the population
- 45,226 people aged 65 and over, reflecting around 30% of the population

The stock of dwellings in East Devon stood at 70,175 in 2021, of which 6,746 are considered to be affordable. This proportion of affordable dwellings (9.6%) is lower than both the county (11%) and national (17.2%) average.

The average house price in East Devon was £359,000 in April 2024 (up 3.7% from April 2023) This was higher than the rise in the South West (1.8%) over the same period. The affordability ratio for East Devon now stands at 10.88 up from 10.08 in 2020. This illustrates that increasing house prices over the period have not been matched by increases in earnings making housing in the District.

There were 64,800 people aged 16 and over in East Devon who were employed in the year ending December 2023. The employment rate for East Devon is 77.5%.

In 2018 7,295 VAT registered businesses were listed in the district this is the highest number of businesses of all the Devon districts including Exeter. East Devon has a high number of micro and small businesses as well as high levels of self employment. The main types of employment are in the services industry which accounts for 86% of the employment in East Devon with a large section of this being in the retail, hospitality and health sectors all of which are predominantly lower paid sectors.

Paragraph 8 of the NPPF identifies how local planning authorities should plan for sustainable development within their area and across local boundaries and emphasises the three interdependent roles of sustainable development:

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and



future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The effect of the proposed development, taken individually and cumulatively, on population, housing, education, the economy and healthcare, during both the construction and operation phases, will provide positive effects. The socio-economic effects will apply largely once the development is operational, however there are some socio-economic effects that will arise during the construction phase including additional jobs, some of which are likely to provide for the local community's needs, and by increasing the expenditure in local facilities.

The provision of up to 2,000 dwellings on the Site is considered to have a long term, permanent, moderate beneficial effect due to the contribution toward meeting the local housing targets, providing a range of dwelling sizes and unit types which will contribute to generating a balanced community and sustaining the needs of all sections of the local population.

The masterplan proposes additional housing which will be a walkable distance to essential community infrastructure such as employment space, primary school and improved highways infrastructure.

The Applicant will undertake consultation with DCC Education Authority to ensure S106 contributions are in place to achieve an ultimate negligible effect on Secondary Education.

There are many opportunities to apply healthy urban design principles which not only mitigate potential adverse health impacts but also work to enhance potential health opportunities in line with local public health objectives. It is therefore considered that there would not be a significant environmental impact that would warrant a socio-economic chapter in the ES.

A Health Impact Assessment (HIA) is a requirement on the East Devon validation checklist for all large-scale development (which includes developments over 200 dwellings and/or 10,000 m² of employment floor space or on sites greater than 2 ha). The health of the existing and proposed population will be considered as part of a HIA that will be submitted in connection with the OPA.

Agricultural Land

The majority of the development parcels within the site comprise semi-improved grass land used for agricultural purposes. Whilst there is no detailed Agricultural Land Classification (ALC) survey results for the Site, it is understood from Natural England's Agricultural Land Classification Map South West Region (ALC006) that the majority of the agricultural land is Grade 3 – Good to Moderate (coloured



green), with some areas to the north and west classified as Grade 1-Excellent. (coloured blue), as shown on figure 7 below:

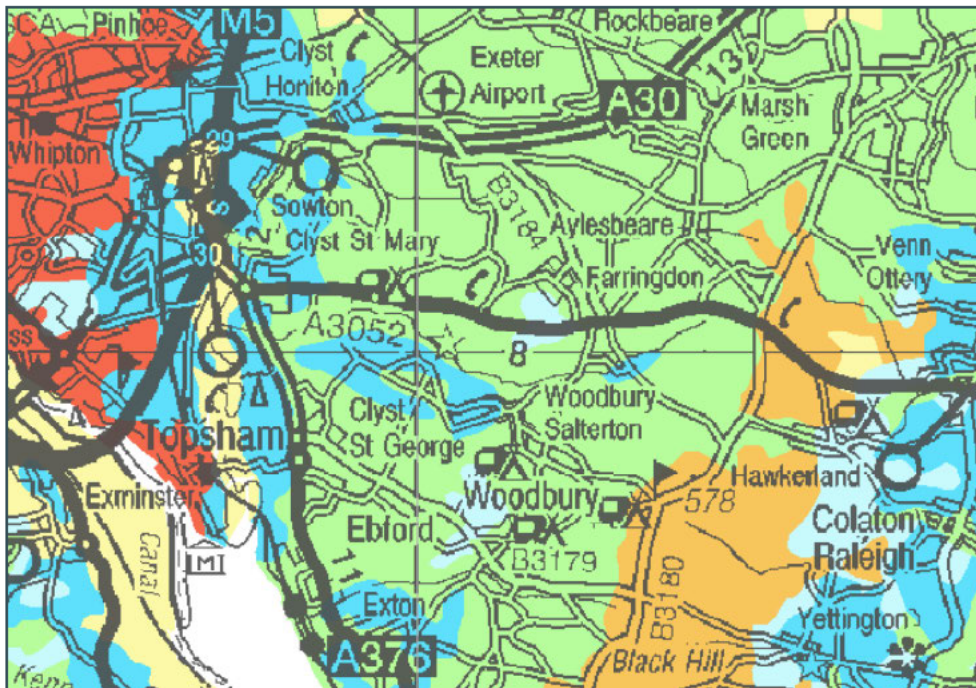


Figure 7 - Agricultural Land Classification Map Southwest Region

Whilst Best Most Versatile (BMV) agricultural land is therefore not expected to be widespread across the Site, some may exist but is not considered to result in a significant environmental impact.

It is however proposed that a detailed ALC survey will be carried out to ascertain the agricultural land quality of the Site. This will be carried out by a qualified and experienced ALC soil surveyor in accordance with the MAFF Revised Methodology for ALC (MAFF, 1988). This will allow identification of any BMV land, and qualification of the area. Those results will then inform the ALC Survey Report that will be submitted as part of the planning application documents for the site.

It is also considered that there is an opportunity for any higher quality areas of land within the Site could be used for food production such as community allotments or orchards, to ensure that the most fertile soils are protected and kept free from development.

It is considered that the effect on poor quality agricultural land would not be so significant as to justify consideration in an ES chapter but could be addressed within the OPA submission through the submission of an ALC.

Summary

This letter is a request for a Scoping Opinion from EDDC pursuant to Regulation 15 of the EIA Regulations 2017 (as amended). This EIA Scoping Report suggests a comprehensive scope of work



based on previous experience of the assembled team of specialists and existing detailed knowledge of the site.

EDDC and consultees are invited to consider the contents of this Report and comment as to whether the scope proposed is acceptable within the five-week period prescribed by the EIA Regulations.

In the meantime, should you have any queries or require any further information, please do not hesitate to contact us.

Yours sincerely



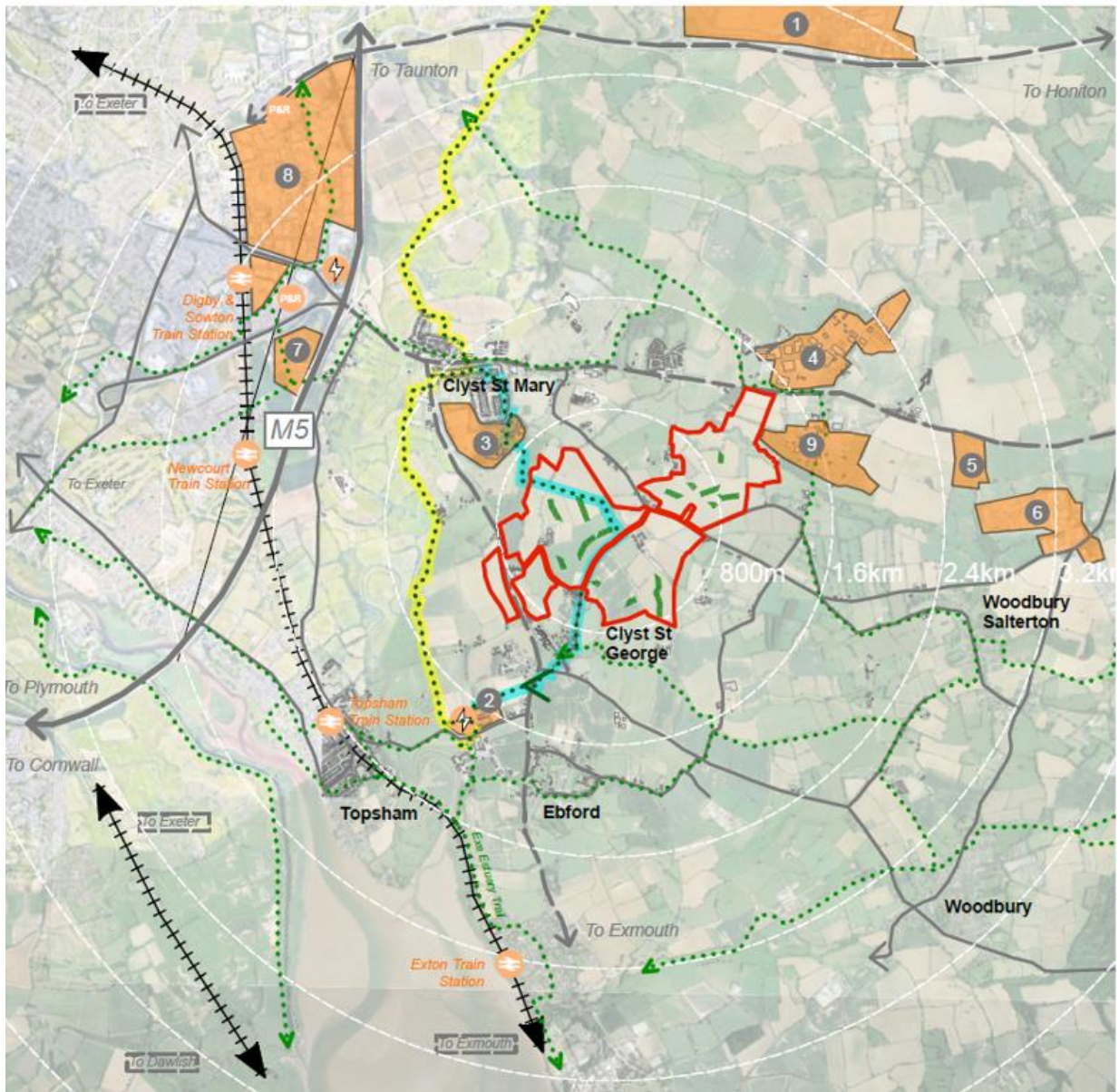
Simon Coles
Director
CarneySweeney



APPENDIX A

Site Location Plan





APPENDIX B

Highways Scoping Note



Messrs Down, Freemantle & Broome

Land between Clyst St Mary and Clyst St George, East Devon

SLR Project No.: 422.065048.00001

25 June 2024

Revision: V1

RE: EIA SCOPING NOTE TRAFFIC & MOVEMENT CHAPTER

1.0 Introduction

- 1.1 This scoping chapter has been prepared by SLR and sets out the scope of assessment for the examination of environmental impacts related to additional traffic resulting from the proposed development of land between Clyst St Mary and Clyst St George, East Devon. The scope of assessment has been set out for the agreement of Devon County Council, the local highway authority (LHA).
 - 1.2 The assessment will be undertaken in line with the Institute of Environmental Management and Assessment (IEMA) Guidelines 'Environmental Assessment of Traffic and Movement (July 2023).
 - 1.3 Alongside this EIA scoping exercise, SLR will be entering into separate pre-application discussions with respect to the scope of any future traffic impact assessment.
- 1.1 The site is located between Clyst St Mary and Clyst St George, East Devon. It is historically referred to as the Option 3 site for a potential new settlement.
 - 1.2 It is situated within the area defined as 'West End', by East Devon District Council, falling along the western edge of East Devon Local Authority area, whilst lying immediately east of the neighbouring city of Exeter.
 - 1.3 The following elements have been set out within this scoping chapter for agreement:
 - Baseline information, including identification of sensitive receptors, and geographic scope of assessment;
 - Future year assessment, including the approach to the assessment and cumulative impact scenario;
 - The methodology employed to quantify and assess the impact of the proposed development on the local transport network; and

- Assessment of effects.

2.0 Baseline Studies

2.1 In accordance with the IEMA guidance, the impact of traffic and movement is dependent on a wide range of factors. These include:

- Current state of traffic and movement environment;
- Volume of development traffic;
- Traffic speeds and network operational characteristics;
- Traffic composition (e.g. percentage of HGV's);and
- Future cumulative development traffic.

2.2 Whilst a Transport Assessment (TA) will be submitted with the planning application, the scope of which will be agreed with Devon County Council under separate cover, the Traffic & Movement Chapter of the EIA will present the impact of traffic and movement on people and the environment, initially undertaken with reference to daily traffic flows prior to assessing the time period with the greatest potential impact (degree of change from baseline conditions) which may not be the same as the time period with the highest baseline traffic flow.

Affected parties/sensitive receptors

2.2.1 Various population groups will be considered that may be sensitive to changes in traffic conditions. The following user groups will be considered:

- Non-motorised users
- Public rights of way users
- Motorists and freight vehicles
- Public transport
- Emergency services.

2.2.2 Further to the above, in accordance with the guidelines, the following special interests will be considered when defining sensitive receptor geographic locations:

- People at home;
- People at work;
- Sensitive and/or vulnerable groups (including young age; older age; income; health status; social disadvantage; and access and geographical factors);
- Locations with concentrations of vulnerable users (e.g. hospitals, places of worship, schools);
- Retails areas;



- Recreational areas;
- Tourist attractions;
- Collision clusters and routes with road safety concerns; and
- Junction and highway links at (or over capacity).

2.2.3 The above receptors within the study area will be assigned to the nearest highway link and the relationship with the highway environment examined to understand the sensitivity of those receptors to change.

2.2.4 The impact of traffic changes will vary according to existing traffic levels; location; time of day; seasonal variation, road design; crossing points, landscape; and ambient conditions.

Geographic Scope

2.2.5 The study area will be agreed with the highway authority and informed by the following two broad criteria that limit the scale and extent of the assessment in highway terms:

- **Rule 1** – Include highway links where traffic flows will increase by more than 30% (of the number of heavy goods vehicles will increase by more than 30%);
- **Rule 2** – Include highway links of high sensitivity where traffic flows have increased by 10% or more.

2.2.6 The masterplanning and vision led approach will seek to maximise community, carbon reduction and health benefits and in so doing will promote a land use and mobility strategy that will seek to accommodate a range of journey purposes both within the site and vicinity. For journeys further afield, a comprehensive sustainable transport strategy will seek to ensure that trips by car remain a last resort with alternatives representing an equally or more convenient option.

2.2.7 It is important to note that whilst the strategy will not prevent vehicles trips, the strategy represents a viable alternative to costly road infrastructure schemes by impacting existing travel habits in addition to those attributed to future residents. The net impact can ensure that adverse impacts are managed on key routes and junctions. This can form part of the mobility vision for the site which will form an integral part of the masterplan strategy.

2.2.8 With respect to the EIA, by pursuing this approach the geographic scope of assessment can be managed such that Rule 1 or Rule 2 thresholds are observed and impacts that would otherwise exceed these thresholds, reduced accordingly. On this basis, it is anticipated that



the scope will be confined to the local highway network in proximity to the site with impacts further afield, including the strategic network, managed below the requisite thresholds.

3.0 Future Year Assessment

3.1 The greatest environmental change will be when the project traffic is at the largest proportion of the total flow. An assessment will therefore be undertaken for the following assessment years:

- Construction Phase; and
- First year of each phase.

Approach to Assessment and Cumulative Scenario

3.1.1.1 The approach to assessment will comprise a masterplanning and vision-based approach rather than predict and provide. In accordance with the Department for Transport (DfT) document 'Decarbonising Transport' (2021), the assessment will move away from transport planning based on predicting future demand to provide capacity (predict & provide) to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes.

3.1.1.2 The vision for the site will place community, carbon reduction and health at the forefront, whilst traffic effects will be considered using the SLR Vision & Validate based tool, in accordance with the aspirations of the Department of Transport.

3.1.1.3 Alongside improvements in carbon reduction, and knock on health and social benefits, there is an obvious and natural reduction in car borne travel that comes about for the following reasons;

- day-to-day needs are met within the development, reducing the need to travel, or localising travel so that it can be made on foot or bicycle;
- connecting the development to existing and new settlements, where active travel is the natural choice; and
- connecting existing settlements and destinations so that they can transition away from the car to active and shared travel.

3.1.1.4 Ultimately this strategy increases the complexity of land uses within the area such that there is a wider range of destination choice that can be accessed most conveniently by foot or by bicycle, or where these modes, alongside buses and other shared mobility are easy to access and more convenient than the car. There will be an arc of movement across the West End which connects key population and commercial centres positioned around the eastern edge of Exeter, allowing the site to benefit from the significant potential for trip localisation along with the exemplar sustainable



transport connections along the 'connectivity arc', providing a viable alternative to travel by car for trips further afield.

- 3.1.1.5 To increase baseline traffic flows to future year scenarios, committed development assumptions will be applied in accordance with the IEMA Guidance. TEMPro growth rates will only be applied where justified by undertaking an assessment/comparison of growth rate predictions with actual traffic growth. If TEMPro growth is applied this will be adjusted to reflect committed development assumptions.

4.0 Traffic Impact Assessment

4.1 A traffic model will be derived for the proposals based on a comprehensive mobility strategy, incorporating complementary land uses and priority for active travel modes which will maximise the internalisation and localisation of trips within the site and surrounding area thereby minimising the impact on the local highway network. The development site has the potential to enhance the locality and 'West End' both in terms of transport improvements but also local commerce. This can create wider opportunities for reducing the need for residents (both existing and future) to travel outside of the locality by private car for many daily journey purposes.

4.2 The traffic impact work will be approached on the following basis:

- The assessment will be based on a Vision and Validate principle (also known as decide & Provide), where the masterplan vision principles will lead the mobility strategy;
- Any assessment work will consider an accessibility first approach (not a traffic first approach) i.e.
 - Opportunities to remove and reduce unnecessary travel through good land use planning will be the principal aim, followed by;
 - An assessment of the connectivity potential of active and shared travel modes based on the best possible outcomes;
 - An assessment of the Vision for the site, and prediction of real outcomes base on the Vision (a Vision and Validate approach);
- An assessment of development transport impacts will assess all movement potential, the demand, capacity and constraints to movements identified and further mitigation considered to maximise non-car trips;
- Once complete, any residual traffic demand from the site will then be assessed, with consideration to:
 - Historic and recent traffic trans and how these relate to future forecasts;
 - Wider impacts of current and expected living and work practices; and
 - The potential for trip off-setting and the potential for district wide modal shift potential through enhancements in mobility choice (where congestion is accepted and where active and shared mobility journeys become more attractive than private car use).



- 4.2.1.1 By applying the above approach to both the access strategy and the traffic impact methodology, whilst the trip generation potential of the site will not differ from any other, it will maximise the potential to both internalise trips within the site, and localise both development trips and existing urban trips within the wider locality. Collectively this has the potential to manage the external traffic impact attributed to the site without the need to be reliant on the delivery of unnecessary infrastructure, an approach which will accord with net zero carbon principles.

5.0 Assessment of Effects

- 5.1 A three-stage process will be adopted for the assessment of the environmental impact of the Proposal in transport terms, considering the sensitivity of receptors, the magnitude of the transport impacts and then, based on the first two stages, the significance of the transport impacts.
- 5.2 Guidance on the identification of receptors, affected parties and key issues would be derived from the IEMA Guidelines 'Environmental Assessment of Traffic and Movement (July 2023), as set out in brief, earlier in this chapter.
- 5.3 In considering whether the effects are likely to be significant in environmental terms, the Rule 1 and Rule 2 test set out in the aforementioned guidelines will be taken into account.
- 5.4 The assessment will then consider the effects of the Proposals in terms of the following:
- Severance of communities;
 - Road vehicle driver and passenger delay;
 - Non-motorised user delay;
 - Non-motorised user amenity;
 - Fear and intimidation on and by road users;
 - Road user and pedestrian safety; and
 - Hazardous/large loads.





APPENDIX 2

Pre-Application Request



Clyst New Village

Pre-Application Statement

Land south of A3052 and east
of A376, Clyst St Mary

CarneySweeney

June 2024



CARNEYSWEENEY
PLANNING



Contents

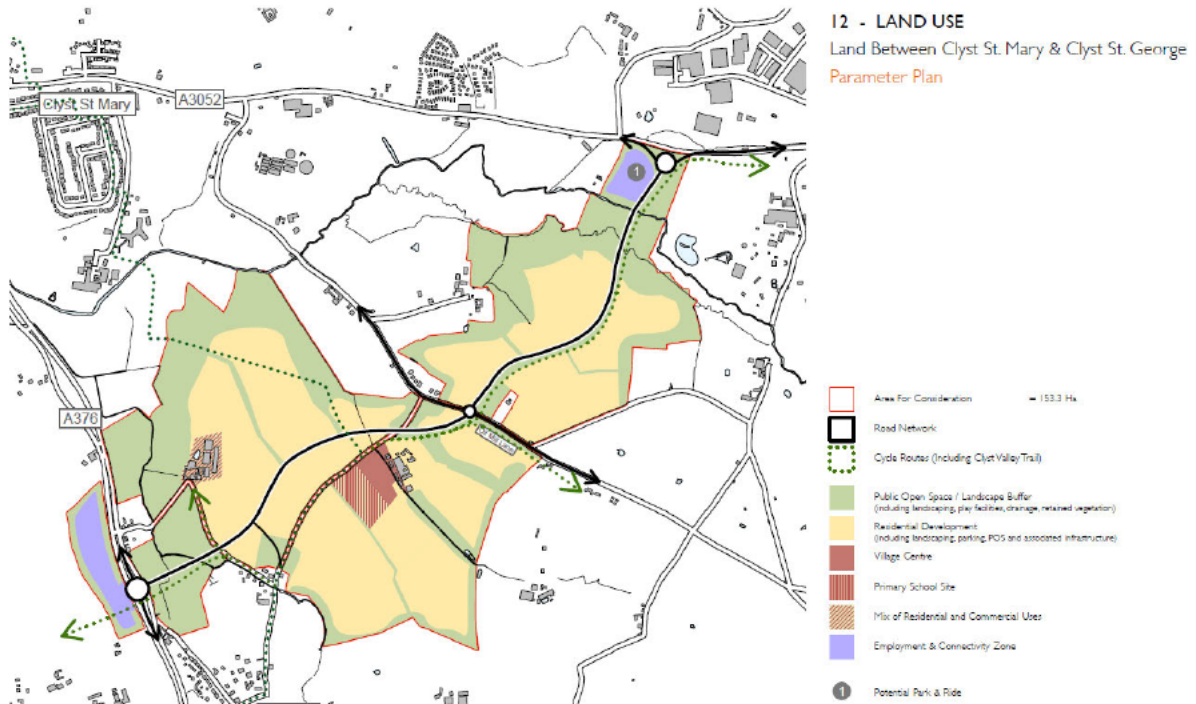
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Prepared by:	LB & JC		
Checked by:	SC & RU		
Issue Date:	25 May 2024	Revision Number:	3



Executive Summary: Clyst New Village

Indicative Masterplan



Benefits

- **Golden opportunity to support the strategic planning of the West End to meet the need for housing and jobs for the next 30 years.** This is a rare opportunity to avoid successive local plans having to grapple with the same challenges time after time.
- **The site area has been significantly reduced and is now controlled by just three landowners who are all fully committed to delivering the new village.** An alternative new town is no longer proposed in this location. The authorities can therefore be confident in a comprehensive masterplanned approach to the whole new village and timely delivery.
- **Supports and complements EDDC's preferred 2nd new community proposal.** Whilst the proposed new village is capable of being delivered independently, it would compliment the 2nd new community in terms of infrastructure priorities and extend the Clyst Valley Regional Park.
- **Boosts the supply of new homes, with delivery in the five year window.** The village scale of the proposed development means that it can be delivered quickly and while the more



significant infrastructure needed for the 2nd new community is planned, costed and constructed.

- **Unconstrained site in planning, physical and environmental terms.** This is confirmed by independent technical analysis undertaken on behalf of EDDC.
- **Potential to deliver affordable housing delivery well in excess of 15%.** Again, the absence of expensive infrastructure enables a more ambitious approach to affordable housing delivery that exceeds the policy target for Cranbrook extension and the 2nd new community.
- **Can deliver up to 2,000 new homes, with a range of densities, house types and tenures.** This includes genuinely affordable market housing, which will appeal to workers in local businesses.
- **Delivers social and community infrastructure in step with new homes.** The absence of expensive infrastructure frees up funds for social and community infrastructure to come forward early in the delivery phases.
- **Reduces development pressure on more sensitive parts of the western part of the District.**
- **Connects to existing employment and leisure destinations in the area.** Strong active travel connections can be achieved to key local destinations including Crealy Theme Park and Resort, Greendale Farm Shop, Winslade Park, Hill Barton Business Park and Greendale Industrial Area
- **Supports active travel connections to employment, leisure and retail facilities proposed in the 2nd new community.** Whilst self contained, the new village can also connect with the 2nd new community.
- **Will incorporate an in-scale range of shops, services and facilities.** This will promote self containment and trip internalisation, reducing the need to travel. It will encourage active travel to all parts of the village through masterplanning and placemaking.
- **Connects to existing Clyst Valley Regional Park and secures the proposed extension to it.**



1.0 Introduction

1.1 Background and Context

- 1.1.1 CarneySweeney acts for CR Down Farming Ltd & Stuart Partners Ltd in connection with the above site. We formally request pre-application advice under Category 1: Large scale Majors of the Council's Pre-Application Planning Fees and Charges. The requisite fee of £750 plus VAT will be paid separately by our clients.
- 1.1.2 Our clients control land within East Devon's "West End" and are actively promoting the development of Clyst New Village (a working title at this stage), which ultimately is intended to be brought forward earlier to and compliment the selected 2nd new community proposal. Promotion will comprise the submission of an outline planning application (OPA) in 2024 and pro-active engagement in the preparation of the draft Local Plan. Our clients are keen to work collaboratively and positively with stakeholders throughout the above stages.
- 1.1.3 A full technical team has been appointed and requisite technical surveys and assessments are in progress. Our aspiration is that through technical survey and assessment work, we are able to support East Devon District Council (EDDC) in developing the evidence base on which rational and logical policy decisions can be made and which involve full consideration being given to proper long-term strategic planning. We are hopeful therefore that we can assist with the preparation of a sound Local Plan in tandem with the grant of outline planning permission for this exciting new village proposal.
- 1.1.4 In due course, a formal request for an EIA Scoping Opinion will be submitted to EDDC for consideration together with a formal pre-application request to Devon County Council (DCC) as Highway Authority.
- 1.1.5 The following document is submitted in connection with this pre-application, noting that technical survey and assessment work being undertaken will inform a completely new masterplan, Landscaping Strategy and Green Infrastructure (GI) Strategy:
- Masterplan Study in East Devon – Grange Architects (March 2022)

1.2 Structure of this Statement

- 1.2.2 The remainder of this Pre-application Statement is structured as follows:
- Section 2.0: Site Description – describes the application site and its surroundings.



- Section 3.0: Vision – Describes the aims, objectives and overall vision for the site.
- Section 4.0: Planning Policy Context - Sets out the provisions of the development plan and other material considerations.
- Section 5.0: New Community Options – Describes the site assessment and call for sites outcomes.
- Section 6.0: Site Assessment – Identifies headline site constraints and opportunities.
- Section 7.0: The Proposed New Village – Describes the proposal and identifies its benefits.
- Section 8.0: Request for Pre-App Advice – Details the specific advice which this formal pre-application submission seeks.



2.0 Site Description & Context

- 2.1.1 The site is identified in red at Figure 1 below. It is located to the south of the A3052 and to the east of the A376 between Clyst St Mary and Clyst St George.
- 2.1.2 Crealy Theme Park and Resort adjoins to the site to the north east and the M5 runs north/south to the west of the site. Exeter city centre is approximately 6.5km to the north west and Topsham is approximately 2km to the south west. The site and surrounding area has a mixed urban and rural context with a series of existing road networks connecting Clyst St Mary and surrounding villages into the strategic road network.

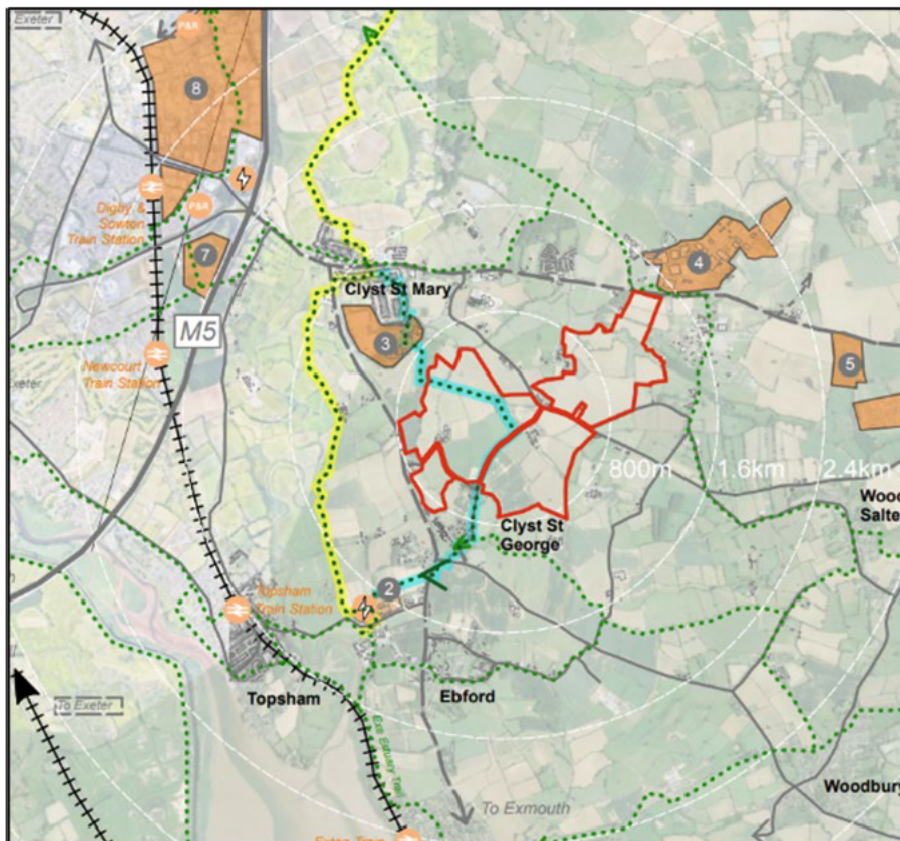


Figure 1: Site Context

- 2.1.3 Access to the site is available in various locations at existing field entrances. A number of existing farms and residential properties are interspersed across the site and Grindle Brook runs in an east-west direction in the most northern field parcel.
- 2.1.4 The site extends to approximately 157 ha and is currently in agricultural use formed of field parcels separated by hedgerows and scattered trees.
- 2.1.5 The site is in a highly sustainable location for housing development with the ability to provide the



local services and facilities necessary on a daily basis as well as connections to local services and facilities. The site is some 250m southwest of the Hill Barton Business Park and approximately 2km to the west of Greendale Business Park which together offer a range of employment, retail and leisure opportunities. Greendale Farmshop is some 1.5km to the east.

- 2.1.6 Bus stops are located on the A3052 and provide regular services to Seaton, Honiton, Sidmouth and Exeter. Exeter contains a wide range of supermarkets and employment opportunities including those located at Sowton Business Park and the city centre. Services from Exeter Central Station and St David's provide a wide range of further connections.
- 2.1.7 Junction 30 of the M5 is located approximately 2.8km to the west and provides direct access to Taunton and Bridgewater to the north and Newton Abbot to the south.
- 2.1.8 National Cycle Network Route 2 is located approximately 1.5km to the south west of the site which provides a largely traffic free link along the eastern edge of the Exe estuary west via the Science Park.



3.0 The Vision

“Clyst New Village will help to meet the need for housing and jobs in the District for the next 30 years. It will become a sustainable, healthy, and active new community, set within a locally distinctive, high quality environment that is sensitively and seamlessly integrated with the surrounding landscape. The village will foster sustainable and active transport connections to existing infrastructure as well as infrastructure delivered by the 2nd new community to the north. It will also support the Council’s zero carbon ambitions and provide a range of social and community infrastructure along with employment, leisure, a range of other facilities and green open space in step with the delivery of new homes. Whilst the proposed new village is capable of being delivered independently, it would compliment the 2nd new community in terms of infrastructure priorities and extend the Clyst Valley Regional Park.



Vision Objectives



Figure 2: Vision Objectives



◆ **Climate Resilience Future Proofing and Net Zero Carbon**

3.1.1 Clyst New Village will seek to meet the net zero policy aspiration of the draft Local Plan and the locally designated climate emergency. It will seek to create a sustainable new settlement in its own right, albeit one that complements and connects with the 2nd new community.

◆ **Cater for All**

3.1.2 Clyst New Village will deliver up to 2,000 new homes across a range of residential dwelling types, sizes and tenures. This encourages an ‘inclusive’ community and also allows families and individuals to remain within their chosen neighbourhood as their lifestyle and housing requirements naturally change.

◆ **Protecting and Enhancing Ecology and Integration into Existing Green Infrastructure**

3.1.3 Clyst New Village will integrate sensitively with its local landscape and ecology setting, seeking to provide for the long-term enhancement of biodiversity within and around the new development. The new community will both link with and support the delivery of the Clyst Valley Regional Park (including its proposed extension), so helping to connect residents with nature and the outdoors.

◆ **Integration with Surrounding Built Infrastructure and Existing Communities**

3.1.4 Clyst New Village is ideally placed to benefit from:

- Proximity to and the potential to connect with existing infrastructure, services and facilities in the surrounding area, such as Crealy Theme Park and Resort, Winslade Park, Greendale and Hill Barton Industrial Estates, Greendale Farm shop complex.
- Those new facilities to be delivered as part of the 2nd new community.
- The delivery of shops, services and facilities within the new village through placemaking, which will achieve trip-internalisation, thereby promoting sustainability, self-containment and reducing the need to travel by private car.

3.1.5 Provision of employment and connectivity zones suitable to accommodate a range of mixed-use development will ensure the development will provide a range of employment opportunities for residents and surrounding areas. Nearby Hill Barton employment site and Crealy Theme Park and



Resort will also provide jobs that are likely to be attractive to new village residents, and some will travel to other locations for work purposes including Exeter. Moreover, the new village will accommodate community and education facilities (including a new school) to meet the needs of all age groups that will live at the new village.

◆ **Sustainable Transport, Including Public Transport, Walking and Cycling and Reducing Reliance Upon the Car**

3.1.6 Open spaces and facilities will be readily accessible to all residents with convenient and attractive pedestrian and cycle links to local destinations and access to high quality public transport services.

◆ **Creating a Sense of Place with High Quality Design**

3.1.7 Clyst New Village will be built to locally distinctive high quality design standards, incorporating the best environmentally friendly technology as well as energy and resource efficiency measures.

The Delivery Model

3.1.8 The delivery model is summarised at Figure 3 below.

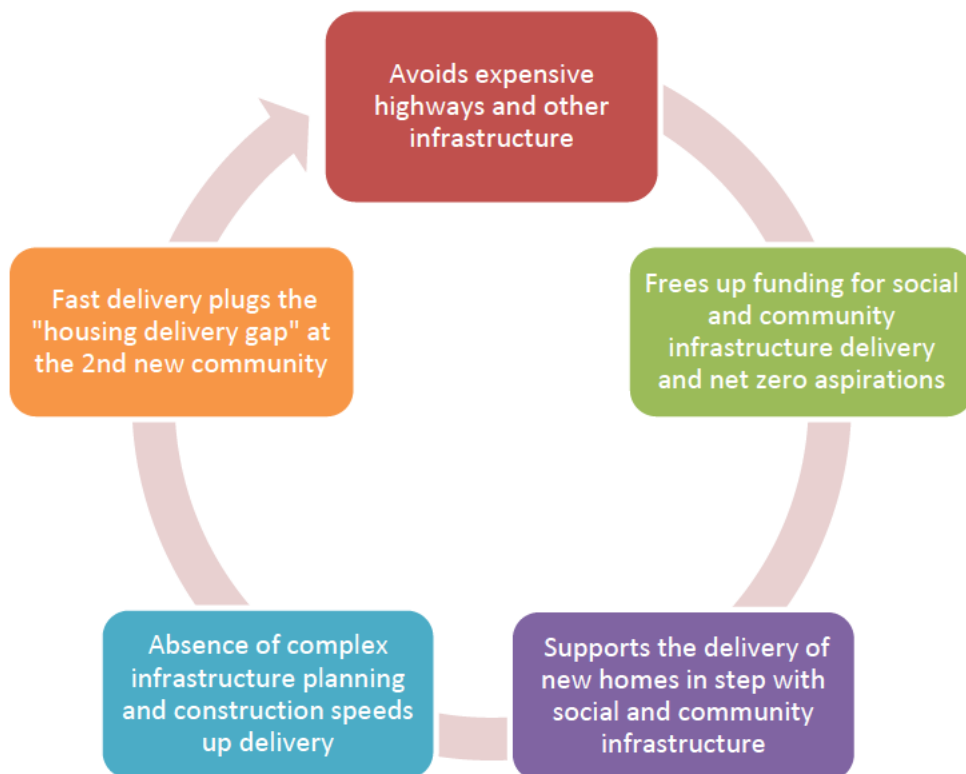


Figure 3: Delivery model



4.0 Planning Policy Context

4.1 Introduction

4.1.1 The starting point for the consideration of any planning proposal is the Development Plan. Section 38(6) of the Planning & Compulsory Purchase Act 2004 confirms that all planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

4.2 Development Plan

4.2.1 The site falls within the jurisdiction of EDDC and the statutory Development Plan for the area comprises the East Devon District Council Local Plan 2013-2031 (adopted LP), which was adopted on 28th January 2016, the Farringdon Neighbourhood Plan and the Clyst St George Neighbourhood Plan.

Adopted LP

4.2.2 Key policies include:

- **Strategy 10** (Green Infrastructure in East Devon's West End) - Seeks to provide new wildlife corridors, open space and biodiversity enhancement areas as well as enhancing cycling and walking opportunities to link habitats and sustainable movement networks that promote the overall recreational experience for the West End.
- **Strategy 11** (Integrated Transport and Infrastructure Provision at East Devon's West End) - seeks to promote high quality and integrated transport provision at East Devon's West End by securing a provision based on a hierarchy of:
 1. Walking
 2. Cycling
 3. Frequent and high quality Public Transport provision (given priority over other road users)
 4. Private motor vehicles.
- **Strategy 38** (Sustainable Design and Construction) – The policy encourages proposals for new development to demonstrate through a Design and Access Statement how:



- Sustainable design and construction methods will be incorporated, specifically, through the re-use of material derived from excavation and demolition, use of renewable energy technology, landform, layout, building orientation, massing, use of local materials and landscaping.
 - The development will be resilient to the impacts of climate change.
 - Potential adverse impacts, such as noise, smell, dust, arising from development are to be mitigated.
 - Biodiversity improvements are to be incorporated. This could include measures such as integrated bat and owl boxes, native planting or green roofs.
- **Strategy 40** (Decentralised Energy Networks) - The policy requires new development with a floor space of at least 1,000m² or comprising ten or more dwellings to, where viable, connect to any existing, or proposed, Decentralised Energy Network in the locality.
 - **Strategy 41** (Allowable Solutions) - Where on-site provision of renewable technologies is not desirable or appropriate, developments can meet requirements through contributing to 'off site' provision in the form of making 'Allowable Solutions contributions'. Monies gathered will contribute to a 'Community Energy Fund' that will be used to pay for/contribute to energy conservation/renewable initiatives.

Farringdon Neighbourhood Plan

- 4.2.3 The Farringdon Neighbourhood Plan was “made” on the 18 June 2021. The area designated as the neighbourhood plan area is shown edged red at Figure 4 below.

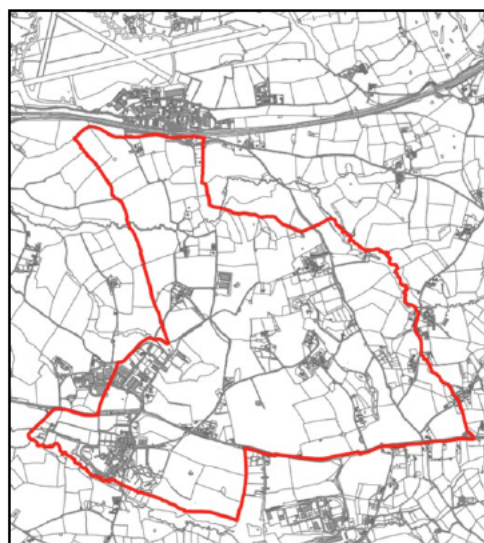


Figure 4: Farringdon Neighbourhood Plan Area



4.2.4 Relevant policies include:

- **Policy Farr12** (Walking and Cycling Routes) - Seeks to encourage development proposals to improve accessibility and extend local footpaths, bridleways and cycle-paths and strengthen links with the wider transport and public rights of way networks.

Clyst St George Neighbourhood Plan

4.2.5 Clyst St George Neighbourhood Plan was “made” on the 10 January 2019. The area designated as the neighbourhood plan area is shown edged red at Figure 5 below.

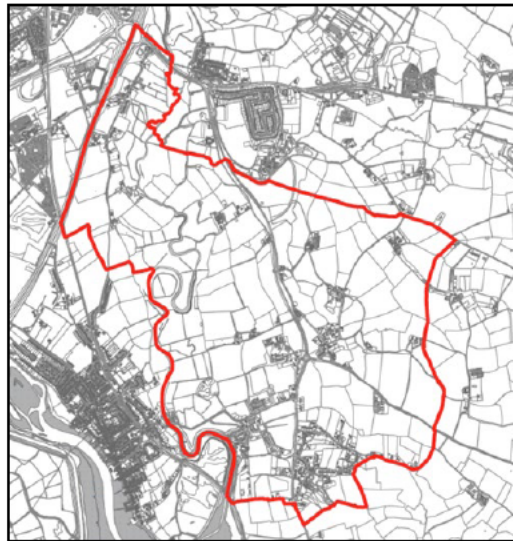


Figure 5 – Clyst St George Neighbourhood Plan Area

4.2.6 Relevant policies include:

- **Policy CSG14** (Safer Travel Measures) - seeks to provide wider and safer footpaths and improved pedestrian and cycling routes within and between local settlement areas.

4.3 Material Considerations

National Planning Policy Framework (December 2023)

4.3.1 The National Planning Policy Framework (NPPF) 5 provides a framework for the development and application of locally prepared plans and the Government’s planning policies for England.

4.3.2 Chapter 5 “Delivering a sufficient supply of homes” refers to the Government’s objective of



significantly boosting the supply of homes and seeking to meet as much of an area's identified housing need as possible. On adoption, the new LP must demonstrate at least a 5 years' supply of deliverable housing sites.

4.3.3 Paragraph 74 states that:

74. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:
- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
 - b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
 - c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;
 - d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)³⁹; and
 - e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

Planning Practice Guidance

- 4.3.4 Planning Practice Guidance (PPG) provides further advice on various planning issues associated with development, including those linked to sustainability and renewable energy and underpins the policies within the NPPF.

National Design Guide



- 4.3.5 The National Design Guide published in October 2019 forms part of the PPG. It sets out the characteristics of well-designed places and explains what good design means in practice, including how development can contribute to climate change mitigation through greenhouse gas emissions reduction during both construction and operation.

Emerging East Devon Local Plan

- 4.3.6 EDDC is in the process of preparing a new Local Plan to cover the period 2020-2040, which will eventually replace the adopted LP. Consultation on the Preferred Options Regulation 18 East Devon Draft Local Plan 2020-2040 (draft LP) ran from November 7th 2022 to January 15th 2023.
- 4.3.7 Of particular relevance are the overall Spatial Strategy (Strategic Policy 1) and the proposals for the development of a Second New Town East of Exeter (Strategic Policy 8).
- 4.3.8 Representations were submitted in connection with a proposed new community on what was to a much larger site than the one on which technical advice is now being sought.
- 4.3.9 A further Regulation 18 consultation is currently underway to address matters not addressed in the previous Regulation 18 consultation.
- 4.3.10 It is envisaged that representations will be submitted on this and the Regulation 19 draft LP when it is published this coming winter.



5.0 New Community Options

5.1.1 Following a call for sites in 2017 and 2021, submitted options were assessed and these led to the identification of 3 new community options.

5.1.2 At its meeting on 1st November 2022, Strategic Planning Committee (SPC) considered a report on the 3 options, with options 1 and 3 scoring higher and option 1 slightly ahead. SPC agreed to the principle of a 2nd new community forming a key element of a growth strategy in the draft LP.

5.1.3 SPC resolved as follows:

To agree to consult on a proposed new community with option 1 identified as the preferred option and options 2 and 3 as alternative options for consultation.

5.1.4 A further detailed technical assessment of all 3 options (Options Appraisal Report) was considered by SPC on 5th December 2023, which resolved:

That Members agree to option 1 being the council's preferred approach for a further new community and the consultant group be instructed to progress their work in master planning this option, developing a preferred delivery model and business case.

5.1.5 The Options Appraisal Report outlines the outcome of technical work which has been undertaken to assess potential site locations, having regard to a range of relevant environmental, technical and delivery issues, and concludes by providing a scored assessment of the three options.

5.1.6 Site Option 3 is identified below at Figure 6.



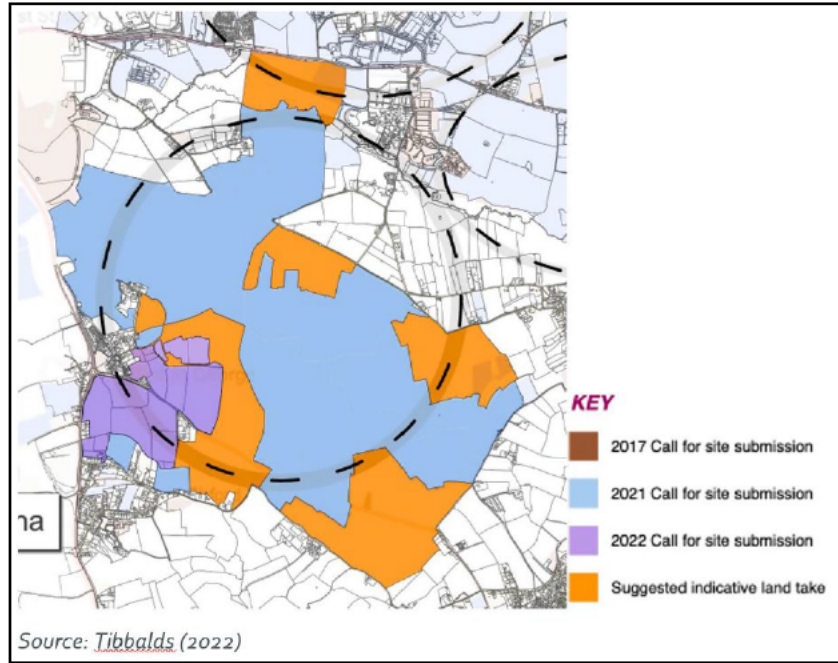


Figure 6: Option 3 site assessment area

5.1.7 It should be noted that the site identified as option 3 is a much larger site than is being put forward under this pre-application submission. The site now includes land within the ownership of just three separate landowners only and covers a site area of 156.7 ha. The extent of the site put forward is included below at Figure 7 below for ease of comparison.

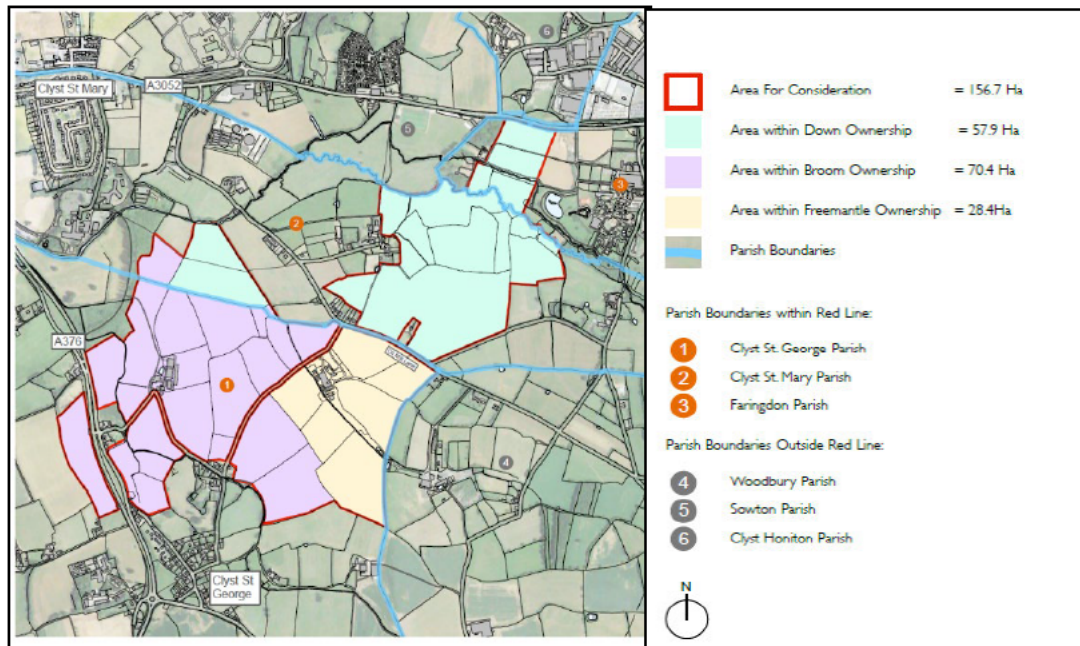


Figure 7: Site Extent and ownership



5.1.8 The Options Appraisal Report sets out the assessment work undertaken for the three sites and includes the scoring summaries dated November 2022 as follows:

Assessment Category	Option 1	Option 2	Option 3
Landscape Sensitivity	2	2	3
Ecological Impact/Biodiversity*	3.4	3.6	3
Flood Risk	4	4	4
Minerals	3	1	5
Historic Environment	3	3	3
Sustainable Accessibility*	3.8	1.8	4.3
Highways*	4.8	4.1	4.6
Utilities*	3	2.3	2.3
Net Zero Carbon*	3.3	2.3	3
Climate Resilience*	2.7	3.4	2.7
Deliverability*	4.5	3	2.5
TOTAL	37.5	30.5	37.4

Figure 8: November 2022 Assessment

5.1.9 Option 1 (37.5) and option 3 (37.4) score almost identically.

5.1.10 An updated scoring was carried out in 2023 and is set out below as follows:

Assessment Category	Option 1	Option 2	Option 3
Landscape Sensitivity	2	2	3
Ecological Impact/Biodiversity*	3.4	3.6	3
Flood Risk	4	4	4
Minerals	3	1	5
Historic Environment	3	3	3
Sustainable Accessibility*	4.3	2	4
Highways*	4.8	4.1	4.6
Utilities*	3	2.3	2.3
Net Zero Carbon*	3.3	2.3	3
Climate Resilience*	2.7	3.4	2.7
Deliverability*	4.5	3	2.5
TOTAL	38.3	31.7	37.4

Figure 9: Updated Assessment December 2023

5.1.11 Additional assessments undertaken on land ownership, sustainable accessibility and highways enabled these scores to be reviewed which has resulted in marginal changes from the 2022 scoring. The Options Appraisal Report notes that there is now a very slightly larger but still marginal difference (0.9) between Options 1 and 3 (38.3 & 37.4 respectively).

5.1.12 In relation to landscape sensitivity, Ecological Impact/Biodiversity, Flood Risk, Minerals, Historic Environment, Climate Resilience, the option 3 site scored the same or higher than option one. These



are summarised briefly as follows:

Landscape Sensitivity:

- 5.1.13 The south and east of the site is of higher landscape sensitivity. Lower sensitivity land is found in the north of the Option. Identified that levels of landscape and visual effects could be mitigated by focussing development in the northern part of the Option.

Ecological Impact/Biodiversity:

- 5.1.14 Higher potential impact however the location and integration of future green and blue infrastructure for the new settlement will be able to accommodate existing and future ecological processes and biodiversity.

Flood Risk:

- 5.1.15 Low to medium flood risk that can be reduced by well designed and implemented drainage and water mitigation strategies.

Minerals:

- 5.1.16 Low Minerals risk.

Historic Environment:

- 5.1.17 Medium risk considered to be able to be mitigated through thoughtful master planning including buffers to protect the environment around historic buildings and assets.

Climate Resilience:

- 5.1.18 The site was identified to have a medium level of resilience.

Other Criteria:

- 5.1.19 In relation to sustainable accessibility, Highways, Utilities and Net Zero Carbon, the site scored marginally lower than option 1. The report however identifies that with thoughtful design and infrastructure improvements these risks would be capable of being mitigated.

Deliverability:

- 5.1.20 The site scored considerably lower in relation to deliverability on the basis that the site included the



highest number of different landowners and inclusion of five areas of unregistered land within the site boundary.

- 5.1.21** The option 3 site is now reduced significantly in size and comprises just three land owners with legally binding agreements to work together to bring the site forward. Accordingly, prospects for delivery are considered to be significantly and materially increased and it is entirely possible that were the sites to be re-scored, option 3 would score the highest.



6.0 Site Assessment

6.1 Introduction

6.1.1 This section identifies physical, environmental and other constraints and opportunities relating to the option 3 site.

6.2 Flood Risk

6.2.1 Figure 10 indicates that the majority of the site falls within Flood Zone 1. Parts of the site to the north and west fall within Flood Zones 2 and 3 in the areas in closest proximity to Grindle Brook and the unnamed stream which runs through the site along the western boundary. All development would be located in flood zone 1.

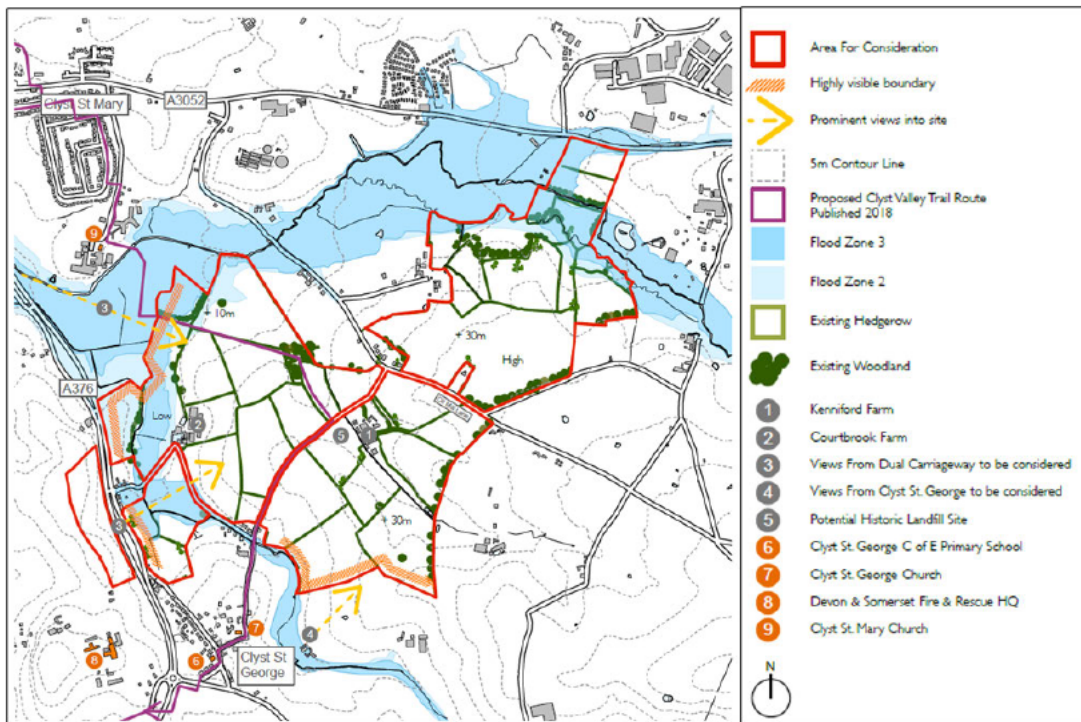


Figure 10: Flood Risk

6.3 Landscape

6.3.1 East Devon AONB is located to the south east of the site, approximately 3.5km from the site at its closest point. See Figure 11 below.



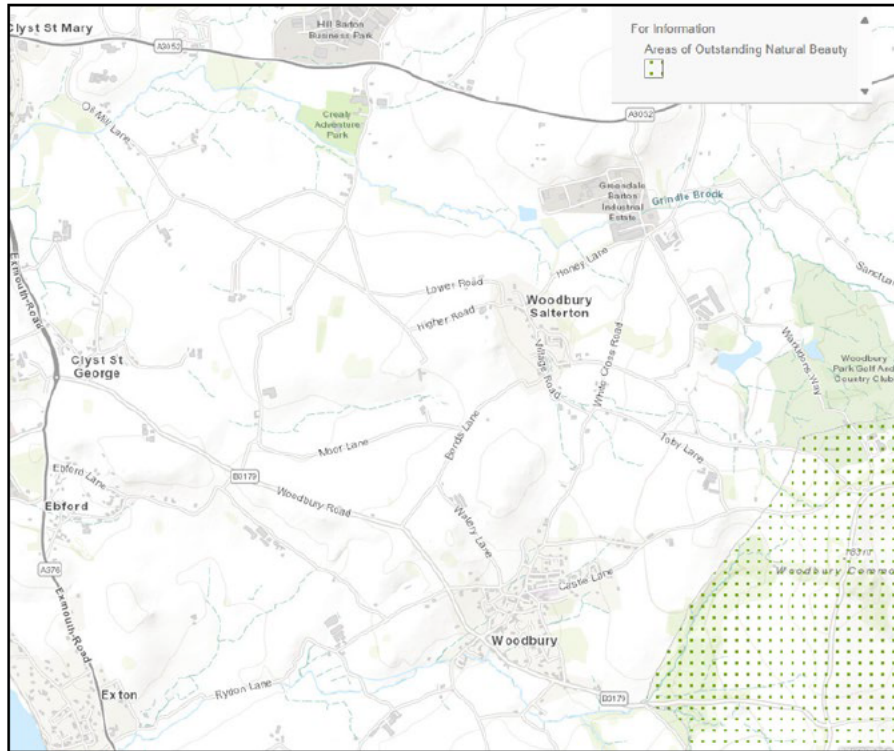


Figure 11: Areas of Outstanding Natural Beauty

6.3.2 Parts of the northern extent of the site have a relatively flat and low-lying topography with existing trees which form a strong structure to the landscape and would assist in screening development and limiting visibility from surrounding areas.

6.4 Trees

6.4.1 East Devon’s online records indicate that there are three TPO’d trees along the western boundary of the site, to the east of Exmouth Road. The trees contained within the site boundary are indicated in red at Figure 12 below. Other TPO trees shown are located beyond the site boundary.



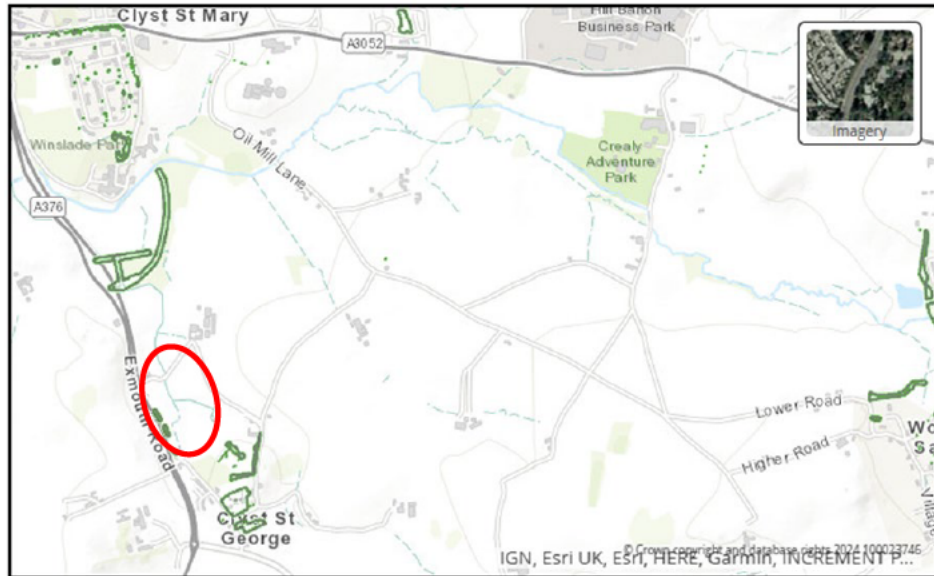


Figure 12: TPO'd Trees

6.5 Ecology

6.5.1 A review of the East Devon policy map reveals that the site does not contain or lie adjacent to any statutory wildlife or local wildlife sites. The Exe Estuary is located approximately 400m to the south west at its closest point. See Figure 13.

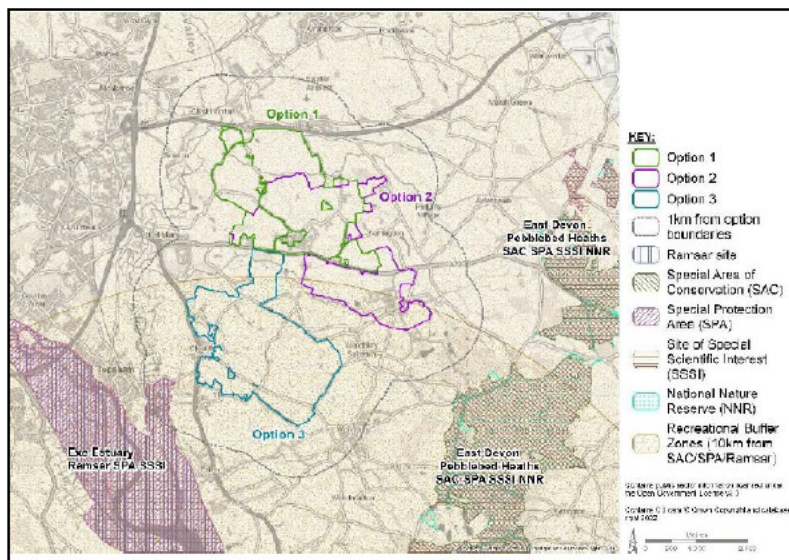


Figure 13: Statutory Wildlife Designations

6.5.2 The site is located within the Exe Estuary, East Devon Pebbled Heaths and Dawlish Warren 10km Recreational Buffer Zone.



6.5.3 A Special Verge Site is located approximately 10m to the west boundary. A further 11 local wildlife sites are identified within 1km of the site. See Figure 14 below.

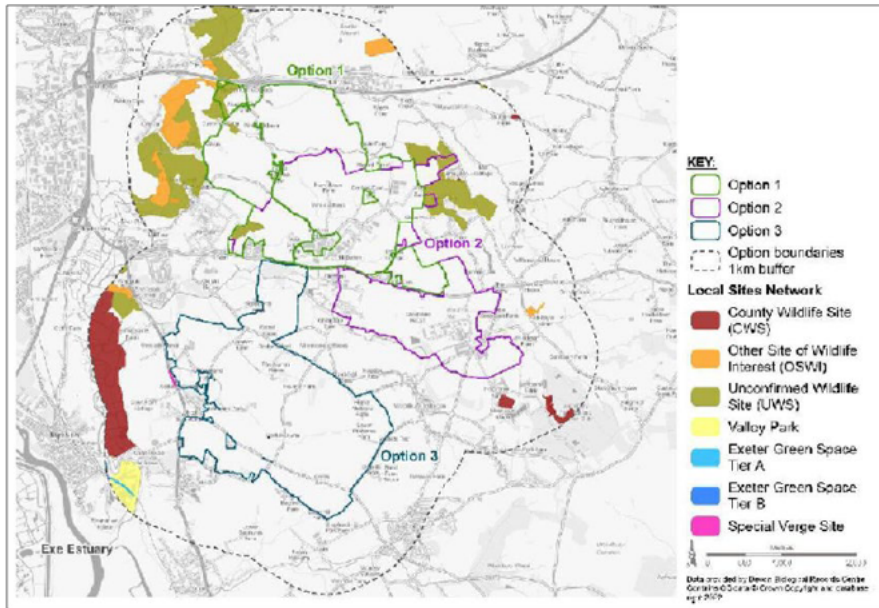


Figure 14: Non-Statutory Wildlife Designations

6.5.4 Network enhancement zone 1 overlaps the site to the north. See Figure 15.

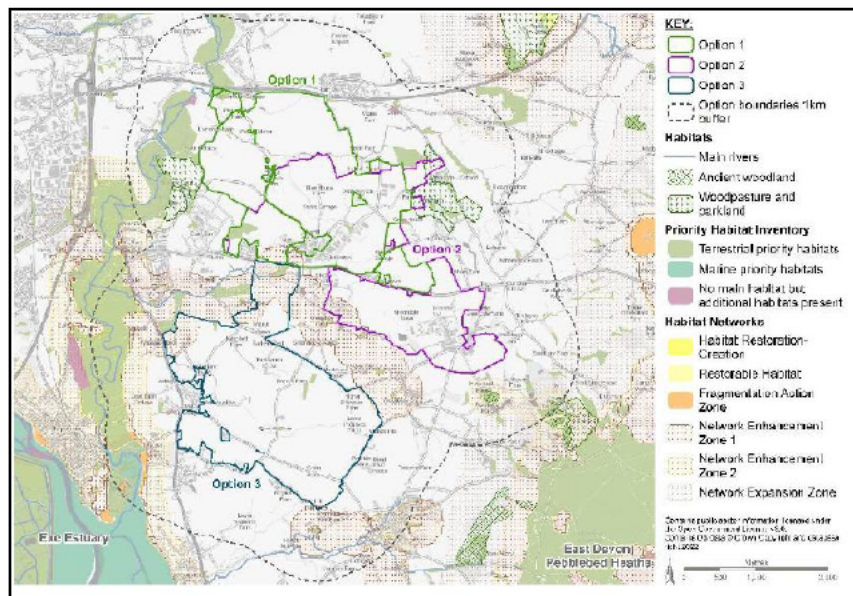


Figure 15: Position within Ecological Network

6.6 Heritage

6.6.1 A review of the Historic England map (see Figure 16 below) identifies a number of listed buildings



within the vicinity of the site at Clyst St Mary and Clyst St George. The grade II listed Kenniford Farm and Greendale House are located within the site. Listed buildings of closest proximity comprise grade II listed buildings.

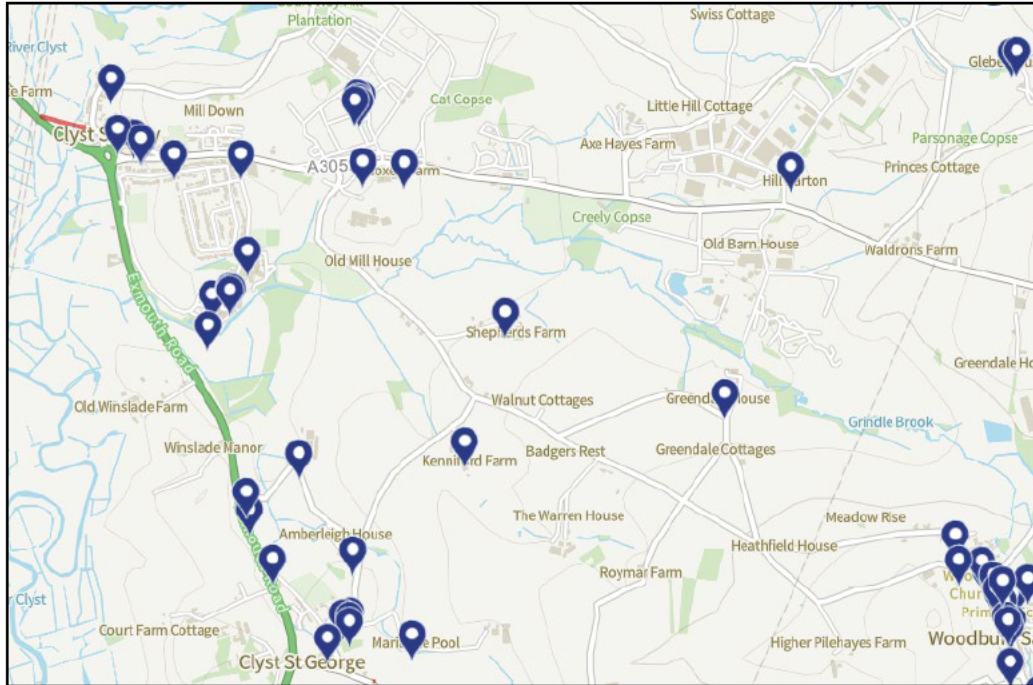


Figure 16: Historic Environment Map

6.7 Highways

6.7.1 As noted above, this new village proposal will be the subject of a separate pre-application request made to DCC as Highway Authority. However, a very clear and coherent transport and connectivity vision is developing involving trip internalisation and creating high quality non-car connections to existing and proposed facilities – all through a comprehensive masterplanned approach to the new village and how it complements the emerging 2nd new community proposals.

6.7.2 It is possible to be confident that this vision is deliverable because of the distinctive location and physical characteristics of the site that are described above.

7.0 The Proposed New Village – an Indicative Masterplan

7.1.1 An initial Indicative Masterplan is shown below at Figure 17, which illustrates how the site could



accommodate a residential-led mixed-use development. It is likely that the masterplan will evolve as we progress towards an OPA and promote the site collaboratively with stakeholders through the draft Local Plan. It is envisaged that the masterplan will evolve and be refined through the technical survey and assessment work that is currently being undertaken in terms of ecology, transport and connections, landscape, landscaping and GI, flood risk and surface water drainage and archaeology/above ground heritage.

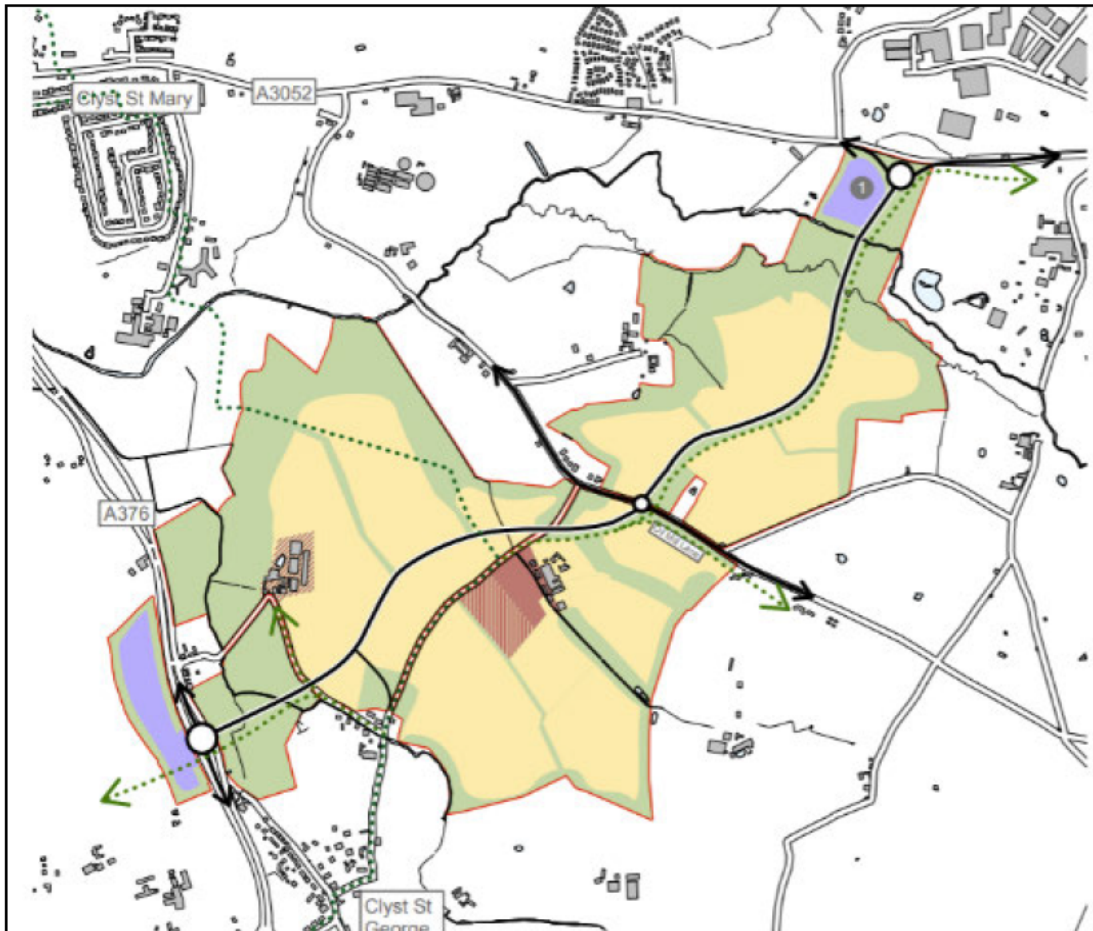


Figure 17– Indicative Masterplan

- 7.1.2 The Indicative Masterplan identifies the opportunity to deliver a new strategic road linking the A376 and A3052. The idea behind this was to reduce pressure at the Clyst St Mary roundabout and connect into the 2nd new community and onwards to the A30, thereby enabling traffic to avoid M5 junctions 30 and 29.
- 7.1.3 In response to EDDC’s aspirations for the 2nd new community, provisions of the draft LP and national



policies aimed at promoting active travel, it is likely that the new masterplan will retain a through route in some shape or form, but will also focus on self-containment and trip internalisation so as to reduce the number of new trips on the strategic road network. It will achieve this by delivering the vision.

- 7.1.4 So while it is still likely to connect to the A376 and A3052 in order to achieve appropriate access, it will incorporate a hierarchy of liveable streets that would, amongst other things, discourage through traffic, while still providing strong connections to the 2nd new settlement to the north, with its anticipated range of higher order shops, services and facilities.
- 7.1.5 The site could deliver up to 2,000 new homes with a range of densities, house types and tenures set in a very high quality environment based on sound placemaking principles.
- 7.1.6 The benefits of avoiding expensive highways infrastructure (larger trunk roads, junctions and associated drainage and services) are potentially significant. The less expensive hierarchy of streets and junctions will free up funding for the delivery of social and community infrastructure in step with the new homes and help achieve the policy aspirations of net zero. This will also allow faster delivery, meaning that the new village could start delivering new homes while the infrastructure for the 2nd new community is being planned and constructed. This will help meet EDDC's ongoing market and affordable housing requirements. It is considered that this nimble and agile delivery model is a notable benefit of the proposed new village and the submission of an OPA in 2024 is absolutely consistent with this.
- 7.1.7 It is envisaged that the village centre would incorporate in-scale leisure and commercial uses, a mobility hub, work space, a primary school and social space for residents to meet, interact and enjoy. It would be at the heart of the village and still be within walking or cycling distance of all new homes.
- 7.1.8 A range of employment-generating uses would be integrated within and adjoining the residential areas throughout the village.
- 7.1.9 Green space would be retained within and along the edges of the village, including more sensitive areas of the site to address any impact on the surrounding landscape. Areas of open space would be provided throughout the development to provide for informal leisure and enjoyment.
- 7.1.10 Connection to the extended Clyst Valley Regional Park is proposed at the northeastern end of the site, which will provide new cycling and walking opportunities into the Regional Park, helping to improve the recreational experience for the future occupiers of the entire new community, in line with the aspirations of Strategy 10 of the adopted LP.



8.0 Request for Pre-Application Advice

8.1.1 Pre-application advice is sought specifically on the following matters:

- The approach to collaborative working with planning officers and elected members, including the potential for a Planning Performance Agreement (PPA) or similar as the OPA is prepared, allowing for dedicated officer support and continuity.
- The approach to collaborative working with planning policy officers and elected members as the Regulation 19 draft LP is prepared and taken through to public examination by PINS.
- The approach to and importance of collaborative working with the promoters of the 2nd new community.
- The principle of the vision and how the proposed development can complement and support the delivery of the 2nd new community.
- The approach to community and Parish Council engagement.
- Use of Member Advisory Panel.
- Use of Design Review Panel.
- The physical, environmental, statutory and planning policy constraints and opportunities and how effects can be mitigated.
- The Council's specific validation requirements for an OPA – not just referring us to the validation checklist.
- The level of affordable housing that would be sought.
- The range of shops, services and facilities that would be sought.
- The approach to supporting the delivery of and connecting to the Clyst Valley Regional Park.
- Any other matter that officers consider appropriate.

8.1.2 An early indication of the Council's likely position on the principle of the proposed development is also sought.

8.1.3 We would welcome an initial meeting to discuss this proposal further.

